

Comhar – the National Sustainable Development Partnership

Initial comments on National Spatial Strategy Consultation Paper No. 1

Comhar welcomes this opportunity to contribute to the preparation of the National Spatial Strategy. This paper represents our initial comments, in relation to basic principles and some issues which are not included in the consultation paper. We will be addressing the proposed Strategy in more detail as the process develops, and will make further input on the basis of our work.

Basic principles

The Strategy needs to be based on, and underpinned by, clear principles. We recommend that these should include the following:

- Sustainable development should be clearly set out as a basic principle for the Spatial Strategy, having regard to the national sustainable development strategy, *Sustainable Development: A Strategy for Ireland* (1997). The Spatial Strategy should be explicitly set in the context of that Strategy.
- The Spatial Strategy should be about development, encompassing people and communities, rather than focusing on economic growth and competitiveness above all else.
- Sustainable regional development should be driven by the needs of the regions, having regard to what is appropriate in each, rather than being driven by a need to deal with over-spill from urban areas, as is emphasised in the consultation paper. It should be recognised that peripheral areas often have the advantage of having preserved cultural and ecological diversity, which should be safeguarded.
- The Strategy should recognise that ecological resources are a requirement for sustainable development into the future.

The objectives and key challenges set out in the consultation paper need to be revisited and redrafted in the light of these principles.

Other issues

The consultation paper sets out an indicative list of issues in relation to the key challenges which the Strategy is to address. However, we believe that a number of issues are missing from this list, as follows:

Urban Ireland and Balanced Regional Development

- Communities in urban areas are not recognised.
- Integrated development is also needed within urban areas.
- The resources of urban areas (e.g. cultural, ecological, infrastructural, architectural) are not recognised (unlike those in rural areas).

Rural Ireland and Balanced Regional Development

- Transport needs are not included.
- Community should be identified as the basis for the Strategy.

People and Balanced Regional Development

- The second point should include linkages between people, skills and settlement strategy.
- The focus should be on quality of life, with competitiveness as one tool to achieve this.

Communications Infrastructure and Balanced Regional Development

- Transport should be addressed from the perspective of development needs, not systems efficiency.
- The second point needs to be qualified by reference to development which is appropriate for the regions themselves.

Management of the Environment and Balanced Regional Development

- Environment needs to be integrated into all areas, not separated out.
- Ecological networks should be the most important element, on which all else depends.
- An integrated environmental monitoring and reporting system for the country is needed, with all the different bodies involved in monitoring aspects of the environment.

Delivery Mechanisms for Balanced Regional Development

- Implementation structures and mechanisms need to be co-ordinated and integrated with other policies and strategies, in particular the National Coastal Zone Management Strategy.
- It is not clear who, and by what mechanism, will finally agree/adopt the Spatial Strategy (compared, for example, to the mechanism whereby County Development Plans are agreed by elected members).

Conclusion

We believe that the consultation process itself will be very important in creating “ownership” of the Strategy, and should seek to achieve step-by-step acceptance of its proposals. Adequate resources must be provided for the consultation process, and from an early stage, in order to achieve ultimate acceptance of the Strategy. The Strategy should also be subject to a sustainability appraisal.