

Office of the Planning Regulator  
Block C, 77 Sir John Rogerson's Quay,  
Grand Canal Dock  
Dublin 2,  
D02 VK60

Email to [info@opr.ie](mailto:info@opr.ie)

12 September 2019

Dear Sir/ Madam

## **DRAFT STRATEGIC PLAN 2019 - 2024**

The Royal Town Planning Institute (RTPI) Ireland is a leading planning body for spatial, sustainable, integrative and inclusive planning. We work to promote the art and science of planning for the public benefit and doing so we:

- support policy development to improve approaches to planning for the benefit of the public;
- maintain the professional standards of our members;
- support our members to have the skills and knowledge they need to deliver planning effectively;
- maintain high standards of planning education;
- develop and promote new thinking, ideas and approaches which can improve planning;
- support our membership to work with others who have a role in developing places; and
- improve the understanding of planning and the planning system to policy makers, politicians, practitioners and the general public.

Thank you for the opportunity to comment on the Draft Strategic Plan 2019 – 2024. Our comments are set out below.

## **THE ROLE OF THE OPR**

RTPI Ireland very much welcomes the establishment of the Office of the Planning Regulator and the roles that it will undertake on assessing local authority and regional assembly forward planning, including development plans, local area plans, regional spatial and economic strategies; the organisational review of the systems and procedures used by any planning authority, including An Bord Pleanála, in the performance of any of their planning functions; and in driving national research, training, education and public information programmes.

We welcome the proactive engagement that the OPR has already undertaken so far with RTPI Ireland and our members, including discussion on research and in speaking out our recent Member Open, as well as highlighting the role that the Institute can play in supporting the OPR's work, as

mentioned in the draft strategy and on your website. We are keen to build upon, and develop this relationship.

RTPI Ireland welcomes the ambitions for the OPR as set out in the draft strategy including its purpose “to oversee the continuous enhancement of Ireland’s planning process and its outcomes by driving the co-ordination of planning at national, regional and local levels, building a stronger knowledge base and ensuring regular reviews of the performance of planning authorities and An Bord Pleanála.”

We also support the proposed vision that by the end of the Strategic Plan period, the OPR will be in a position to conclude that Ireland benefits from a well co-ordinated planning hierarchy and that a wide-ranging, effective and well received programme of education, training and research on planning matters has been put into effect and that a culture of continuous improvement will be created in planning authorities driven by regular reviews of their performance. We believe that a focus on supporting planners to achieve high quality outcomes on the ground should be at the heart of this.

The proposed values of independence, professionalism, transparency, engagement and customer focus are welcomed. The Institute feels that it may also be worthwhile emphasising that the OPR will take a collaborative and collegiate approach to working with partners in the engagement heading. It would also be useful to highlight the importance of the OPR working with stakeholders in a proactive and ‘frontloaded’ way so as to embed learning from its work in practice.

The five goals set out in the draft strategic plan are:

- Building a reputation as a clear, fair and independent voice on the effectiveness of Ireland’s planning process
- Creating a high-performing and efficient organisation that supports and enhances Ireland’s planning process
- Driving innovation and learning for all those that are stakeholders in the planning process
- Building a resilient and agile organisation with a commitment to continuous learning
- Focusing on the needs of customers and those with whom the OPR engages

The Institute welcomes these goals and many of our comments below are aimed at enhancing them and supporting their delivery.

## **THE WORK OF THE OPR**

### **Independent assessment of all local authority and regional assembly forward planning Plan assessment methodology**

The Institute broadly welcomes the approach set out in the draft Strategic Plan on this.

We are of the view that any assessment on plans should be strategic in its nature and focussed upon clear and transparent criteria which are based upon legal requirements. RTPI Ireland would be pleased to support work on developing such criteria.

The Institute is of the view that the OPR’s work should attempt to influence practice proactively and collaboratively. Given this we would support early engagement in the development of plans, perhaps through the establishment and involvement of ‘gateway reviews’ at an early stage of the plan-making process.

It would be useful for the OPR to set out what sanctions it has, if any, when identifying plans which it deems deficient.

## **Examination of the systems and procedures used by any planning authority**

The Institute broadly welcomes the approach set out in the draft Strategic Plan on this.

The development of a national planning performance framework would be useful and we are of the view that this needs to be developed carefully and collaboratively given that it has the potential to drive the behaviours of planners and planning authorities. There will be a role for including measures on the inputs (resources etc) and outputs (planning applications processed, development plans published etc) however we believe that any framework should aim to take an outcomes based approach which measures the quality of development on the ground and the impacts that this has had. The performance framework should be developed collaboratively with planning authorities and organisations including the professional bodies. RTPI Ireland would be keen and happy to be engaged in this work.

Also the RTPI is currently developing research on the development and implementation of outcome based performance frameworks for planning in partnership with governments in the UK and are keen to explore the OPR's engagement in this work. We would be happy to discuss this further with you.

RTPI Ireland also believes that it is important that the complaints function that the OPR is clearly differentiated from the work of the Public Service Ombudsman which focusses on individual planning decisions and the complaints service undertaken by RTPI which is aimed at members of the Institute and their need to comply with our Code of Professional Conduct<sup>1</sup>. We would be happy to discuss this further. Given this any complaints process put in place by the OPR should focus on systematic issues the legality of procedures and patterns of behaviour within organisations and not individual cases.

RTPI Ireland also believes that any performance framework should have regard to the fact the performance of planning authorities can often rely upon other players including other parts of local authorities, Government and its agencies, applicants and communities.

There is a need for clarity and transparency on the criteria to be used in identifying when a complaint should, or should not, be investigated and what is regarded as a 'pass or fail'. Again we believe that this should be co-produced with key stakeholders and the Institute is keen to be involved in this.

## **Driving national research, training, education and public information**

The Institute broadly welcomes the approach set out in the draft Strategic Plan on this. We are particularly keen to work closely with the OPR on this work.

We are pleased that the OPR will become a 'Centre for Excellence' in driving forward good practice. We believe that an 'identify-share-apply' approach would work well. The most difficult part of this is often the area of supporting people and organisations to apply the good practice that they have witnessed. This often relies upon an approach which promotes behaviour change within individuals *and* the organisations they work within.

### ***Continuing Professional Development***

Any CPD provision should recognise the different learning needs and preferences people have – online, face to face experiential, blended – whilst there is a need to build in a 'learning loop' in all of the work undertaken by OPR to ensure that lesson learned can be highlighted and shared. Providing a 'safe space' for those involved with the planning system to enable them to reflect on

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<sup>1</sup> [https://i.emlfiles4.com/cmpdoc/6/2/1/9/5/1/files/59082\\_rtpi-code-of-professional-conduct-feb\\_2016\\_new-cover-2017.pdf](https://i.emlfiles4.com/cmpdoc/6/2/1/9/5/1/files/59082_rtpi-code-of-professional-conduct-feb_2016_new-cover-2017.pdf)

their experience, to identifying learning needs and aspirations and then to develop a future personal development programme would be very useful.

The Institute provides CPD for our members<sup>2</sup> through our Open Forum events, annual law lecture and annual lecture and we are keen that these complement the CPD provisions of the OPR, and vice versa. RTPI members are obliged by the Code of Professional Conduct to undertake 50 hours of CPD over a two year period and to have a personal development plan in place<sup>3</sup>. We also have a new Core CPD Framework<sup>4</sup>, developed with input from members, employers and the wider profession, highlighting the skills and knowledge areas our members need to meet the planning challenges of today and the future.

The Institute also has a number of online training modules on our RTPI Learn<sup>5</sup> platform and we would be keen to explore how this could support the work of the OPR. This currently has bite-size modules on:

- Planning to protect ancient woodlands and trees
- Introduction to Professional Ethics
- What are Smart Cities?
- Digital Economy and Town Planning
- Dementia and Town Planning
- Beginners guide to viability
- Writing Professional Development Plans (PDPs)

and a number of in-depth modules, providing 15 hours of CPD on:

- Viability: Understanding Development Economics
- Planning for Climate Change
- Public Engagement in Planning
- Infrastructure Delivery Planning

Again, we are keen to discuss how these can support and complement the work of the OPR.

### ***Training***

The Institute also provides training courses for members<sup>6</sup>. These are uniquely tailored to the needs of planners and those working in the planning environment. The programme is designed and delivered by our team of industry experts. A wide selection of high quality masterclasses and briefings are available and although these are currently only held in the UK we would be open to a discussion as to whether, with OPR support, these could be rolled out in Ireland.

### ***Education***

The Institute has an important role in accrediting<sup>7</sup> planning courses in Ireland and presently works with University College Cork, University College Dublin and Technological University Dublin. In doing this we work in partnership with them to develop and accredit planning qualifications which allow graduating students to progress towards Chartered Membership of the RTPI.

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<sup>2</sup> <https://www.rtpi.org.uk/the-rtpi-near-you/rtpi-ireland/events/>

<sup>3</sup> <https://www.rtpi.org.uk/education-and-careers/cpd-for-rtpi-members/cpd-requirements/>

<sup>4</sup> <https://www.rtpi.org.uk/education-and-careers/cpd-for-rtpi-members/core-cpd-framework/>

<sup>5</sup> <https://www.rtpi.org.uk/education-and-careers/rtpi-learn/>

<sup>6</sup> <https://www.rtpi.org.uk/events/rtpi-training/welcome-to-our-training/>

<sup>7</sup> <https://www.rtpi.org.uk/education-and-careers/find-a-course/>

## **Research**

As a learned institute, the RTPI has a responsibility to promote the research needs of spatial planning in the UK, Ireland and internationally. We play a number of roles in relation to planning research:

- User – drawing on existing research evidence, for example in our Planning Horizons papers<sup>8</sup>
- Disseminator – acting as a 'bridge' between research, policy and practice, for example through our Research briefings<sup>9</sup>
- Researcher – adding to the evidence base through in-house research and policy analysis, for example our papers on poverty and inequality and tech sectors and planning<sup>10</sup>
- Commissioner – funding and supporting targeted research projects, particularly those of relevance to practitioners and policymakers, for example through our SPIRe programme<sup>11</sup>
- Guider and influencer – promoting a stronger evidence base in planning, for example, through our academic journal Planning Theory and Practice<sup>12</sup>.

We are eager to discuss how this work can support and complement the work of the OPR. We are also very keen to be represented on the new National Planning Knowledge Group and feel that we will have a significant contribution to make to this.

## **Public campaigns**

We would also like to explore with the OPR the role it has in informing the public about planning. Our emerging Corporate Strategy sees a role for the Institute on de-mystifying and de-mything planning for the public and, given this, it would be worthwhile discussing how our organisations can support one another to achieve what appears to be a common ambition.

There may be scope to consider how a planning aid service in Ireland could support these ambitions. RTPI has experience of running the Planning Aid England<sup>13</sup> service and supporting the work of Planning Aid Scotland<sup>14</sup> and would be pleased to discuss this with the OPR.

## **STAKEHOLDERS**

We are pleased to see the recognition of the Institute as an important stakeholder throughout the Strategic Plan and are very keen to follow up the number of areas of possible joint working between the OPR and the RTPI that we have highlighted above. We believe that there are real partnering opportunities that can provide mutual benefits for OPR and RTPI and which can support the profession and planning system to continuously improve and build its public trust.

Our Director, Craig McLaren can be contacted on 08925 15649 or [contact@rtpireland.com](mailto:contact@rtpireland.com) and would be pleased to discuss anything raised in this submission.

Yours faithfully

*Aidan Culhane*

**Aidan Culhane MRTPI**  
Chair

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<sup>8</sup> <https://www.rtpi.org.uk/knowledge/research/planning-horizons/>

<sup>9</sup> <https://www.rtpi.org.uk/knowledge/research/planning-research-exchange/briefing-papers/>

<sup>10</sup> <https://www.rtpi.org.uk/knowledge/research/projects/planning-for-the-growth-of-tech-and-advanced-manufacturing/>

<sup>11</sup> <https://www.rtpi.org.uk/knowledge/research/projects/small-project-impact-research-spire-scheme/>

<sup>12</sup> <https://www.rtpi.org.uk/knowledge/publications/planning-theory-and-practice/>

<sup>13</sup> <https://www.rtpi.org.uk/planning-aid/about-planning-aid/>

<sup>14</sup> <https://www.pas.org.uk/>