



**Oifig an  
Rialaitheora Pleanála**  
Office of the  
Planning Regulator

# **Strategy Statement 2019-2024:**

OPR Report on Submissions Received on Draft Strategy

**October 2019**

## 1.0 Introduction:

The Office of the Planning Regulator (OPR) was established by Government in April of this year as an independent public body to oversee the effective delivery of planning services to the public by local authorities and An Bord Pleanála ensuring quality outcomes in relation to proper planning and sustainable development.

The *Planning and Development Act 2000*, as amended, (the Act) gives the OPR a statutory basis to carry out three main functions:

- independent assessment of all local authority and regional assembly forward planning, including development plans, local area plans and regional spatial and economic strategies;
- examination of the systems and procedures used by any planning authority, including An Bord Pleanála, in the performance of any of their planning functions, including assessing risks of maladministration or corruption; and
- driving national research, training, education and public information programmes.

In summary, the OPR's purpose is to oversee the continuous enhancement of Ireland's planning process and its outcomes by driving co-ordination of planning at national, regional and local levels, to build a stronger knowledge base to inform policy development and implementation, and to bring about improvements through the regular review of authorities' performance.

## 1.1 Legislative Context:

In accordance with Section 31T of the Act, the OPR is required to prepare a Strategy Statement for the Office within six months of its establishment. The Strategy Statement is intended to provide the basis for the OPR's approach to its functions and principal activities. In this regard the Strategy Statement sets out the OPR's high level goals incorporating the actions necessary to achieve them and the milestones to demonstrate progress.

In line with the *Code of Practice for the Governance of State Bodies*, the Minister for Housing, Planning & Local Government was consulted during the drafting process. Whilst there is no statutory obligation, the public consultation process was conducted in order to reflect the views of stakeholders in as far as possible.

## 1.2 Consultation Process:

It was open to members of the public, stakeholders and other interested parties to make observations on the draft Strategy Statement for a six-week period between 1<sup>st</sup> August and the 12<sup>th</sup> September.

The draft Strategy Statement was accessible via the OPR's website [www.opr.ie](http://www.opr.ie) and the public consultations page of the Government's website [www.gov.ie](http://www.gov.ie).

The public consultation process was also announced on the OPR's Twitter page.

The OPR's key stakeholders were directly notified of the consultation process for the draft Strategy, this included the local authority sector, An Bord Pleanála, the various State agencies involved in the statutory planning process, higher education authorities, etc.

### 1.3 List of Persons or Bodies who made Submissions or Observations:

Thirty-one submissions/observations were received from a range of prescribed bodies, planning authorities, regional assemblies, educational / professional institutes, service providers and members of the public these are listed as follows:

<b>Submission/ Observation Reference No.</b>	<b>Name of Organisation:</b>
1	ESPON EGTC
2	Queens University Belfast
3	Member of the Public
4	Environmental Protection Agency (EPA)
5	Keep Ireland Open
6	Irish Planning Institute
7	Longford County Council
8	Environmental Protection Agency (EPA)
9	Irish Water
10	Limerick City and Country Council
11	Dublin Airport Authority
12	University College Dublin (UCD)
13	Technological University Dublin
14	Eastern & Midland Regional Assembly
15	Environmental Protection Agency (EPA)
16	Royal Town Planning Institute (RTPI) Ireland
17	Geological Survey Ireland (GSI)
18	Department of Culture, Heritage and the Gaeltacht
19	The Irish Wind Energy Association
20	Coillte
21	An Taisce
22	Department of Housing, Planning and Local Government
23	Gas Works Ireland
24	Southern Regional Assembly
25	Ervia
26	Laois County Council
27	Offaly County Council

28	City and County Management Association
29	Dublin City Council
30	North West Regional Assembly
31	Local Government Management Agency

#### 1.4 Overview of Submissions/Observations:

The submissions expressed a high degree of support for the establishment of the OPR and the broad shape of the draft Strategy.

Many of the submissions also highlighted opportunities for linkages between the work of the OPR and the relevant organisation. Others more specifically referenced issues such as the relationship between the work of the OPR and the evolving regulatory and policy context for marine planning, the need for a focus on the important roles of planning authorities in relation to enforcement and the role of planning in the delivery of crucial infrastructure, all of which have been reflected in the finalised Strategy Statement.

Another significant theme reflected through a number of the submissions was the issue of climate action and the other pressing environmental challenges we face. The finalised Strategy Statement has been updated to give greater recognition to the role the planning process must play in meeting these challenges.

#### 1.5 Format of this Report:

The submission / observations, as received, have been recorded and compiled into the instant report. The main issues have been identified, grouped into main 'issue headings' and are summarised. There are 13 no. headings that correspond with the content of the draft Strategy. The report format is illustrated in the table below:

<p><b>LAYOUT SAMPLE:</b></p> <p><b><i>Issue 1 – Heading</i></b>  <i>(corresponding to the Draft Strategy Content)</i></p> <p><b>Summary of Key Points/Issues Raised:</b></p> <p><b>OPR Response &amp; Recommendations on Issues Raised:</b></p> <p><b>[Submission/Observation No. 1, 2, .. ]</b></p>
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## **2.0 Summary of Submissions and Observations in Relation to the Draft Strategy:**

### **2.1 Foreword:**

#### **Summary of Key Points/Issues Raised:**

- (1) A significant proportion of the submissions/observations received were from groups that wished to welcome the establishment of the OPR. The opportunity to engage at this early stage in the formation of the OPR and to directly input to the Strategy Statement was considered as a positive and proactive step by the OPR. The establishment of the OPR is a welcome evolution in the Irish planning system. Many of the submissions received expressed a desire to establish a strong working relationship and proactively engage with the OPR in all its functions.
- (2) A number of submissions/observations highlighted that the Strategy Statement should provide greater recognition of the environmental challenges facing Ireland and the role of planning. In this regard submissions pointed to the need for greater prominence in the Strategy Statement to the Climate Action Plan, the implementation of the 2030 Agenda for Sustainable Development goals, and the role of EU directives including: Strategic Environmental Assessment (SEA), Habitats etc. Some submissions went onto more detail and included potential environmental indicators and indicated that the Strategy Statement should have timetabled and quantified actions for the improvement of planning performance at all levels of planning including more effective planning for the tourism sector.
- (3) A number of submissions indicated that the role of planning enforcement extends beyond compliance with permission; the Strategy Statement should reflect the breadth and depth of the planning enforcement function and its importance within the planning system and include reference to, inter alia, unauthorised development, land clearance, quarrying, protected structure endangerment.
- (4) The Strategy Statement should clearly reflect the statutory function of the Regional Assembly (Section 27 of the Act) and role of the Regional Spatial and Economic Strategies (RSES) in this new evolution of planning policy in Ireland. It should be acknowledged that whilst there is complementarity in the roles of both organisations in the evaluation of plans, the independence of each organisation should also be highlighted.
- (5) One submission sought that the final document clarify that the draft Strategic Plan / Strategy Statement prepared for public consultation is the Strategy Statement referred to in Section 31T of the Act.
- (6) Some submissions sought clarity on whether the remit of the Office includes coastal / marine planning processes. It was submitted that the Strategy should acknowledge the interface between terrestrial and coastal management and that there should to be a focus on marine spatial planning given that there is

now alignment between the National Planning Framework (NPF) and the National Marine Spatial Plan.

- (7) Some submissions addressed the roles and functions of the OPR vis-à-vis the role of local authority Chief Executives and their management function.
- (8) It was submitted that the Strategy Statement should refer to the most up to date national statistics (i.e. 2018) in respect of the volume of planning applications processed.
- (9) It was recommended that the Strategy address the issues of whistle blowers and ethics.

#### **OPR Response & Recommendations on Issues Raised:**

- (1) The Strategy Statement as made will acknowledge the degree of support received and has been amended to include reference to this support.
- (2) The Strategy Statement has been amended to place emphasis onto the role of planning process with stakeholders in addressing environment challenges of today, whilst distinguishing that the office is not a policy making body.
- (3) The Strategy Statement has been amended to include an enhanced focus on oversight of the systems and procedures enforcement activities of local authorities.
- (4) The Strategy Statement has been amended to more expressly acknowledge the role of the regional assemblies.
- (5) This has been implemented, the final Strategy makes reference to Section 31T of the Act.
- (6) Whilst the legislative and policy context for marine planning is still evolving the final Strategy Statement makes reference to this.
- (7) Implementation of the Strategy Statement will take cognisance of the functions of the Office and the role of local authority Chief Executives in performing their functions.
- (8) This point has been implemented and more recent data is incorporated into the Strategy Statement
- (9) More express references to the co-ordination of OPR functions with those of other public bodies in relation to ethics and whistleblowing has been incorporated.

**[Submission no. 1, 2, 3, 6, 8, 9,10, 11, 12, 13, 14, 15, 16, 17, 18,19, 20, 21, 22, 23, 24, 25, 26, 27, 28, 29, 30 & 31 refer.]**

## 2.2 Purpose, Vision & Values:

### Summary of Key Points:

- (1) A number of submissions received generally support the overall purpose, vision and values identified in the Strategy, in particular the elements outlined in the vision on *education, training and research* and the core values of *transparency, engagement and customer focus*.
- (2) Some submissions pointed to the need to achieve a balance between professionalism and pragmatism in the functions of the OPR.
- (3) Some submissions highlighted the importance of clarity around the role of the OPR vis-à-vis the role of the Minister on policy development and implementation.
- (4) Some submissions queried the use of the term customer versus citizen, within the Strategy Statement.

### OPR Response & Recommendations on Issues Raised:

- (1) The support and acknowledgment of submissions is noted.
- (2) The Strategy Statement acknowledges the need to take both a professional and pragmatic approach in discharging OPR functions.
- (3) The Strategy Statement has been amended to reflect the distinct roles of the OPR and the Minister's policy and implementation functions.
- (4) The final Strategy Statement makes it clear that our customers include the wider public / citizens in addition to stakeholder bodies.

**[Submission/observation nos. 4, 7, 12, 13, 22, 26, 29, 30 & 31 refer.]**

## 2.3 Organisation:

### Summary of Key Points:

- (1) A number of submissions commended the commitment to assist in ensuring that the public effectively engages with the planning process and is equipped with the necessary access to knowledge and data. The submissions also supported the commitment to ensuring that the planning process enhances the quality of the environment and the need for planning policy to be evidence based. Likewise, the opportunity afforded by the establishment of a Director within the organisation expressly for the purpose of 'Planning Research, Training and Public Awareness' was welcomed.
- (2) The OPR and its Strategy Statement should seek to assist the State to comply with its obligations under the Aarhus Convention and its role in public participation. Query how the OPR will inform the public of Aarhus rights.
- (3) The OPR's Strategy Statement should make a commitment to reducing or eliminating planning observations fees.
- (4) The functions map should include greater differentiation between the three areas and corporate governance should be referenced.
- (5) The reference to the NPF policy on Brownfield sites 50% target should specify that the 50% target is for Dublin and hinterland and 30% is the target applicable for other urban areas.
- (6) The draft Strategy's recognition that policies need to be put into practice which move us *'towards low carbon or carbon free development to support the achievement of binding international obligations on Ireland in relation to tackling the drivers of climate change'* is fully supported.
- (7) Throughout the Strategy there are ambitious intentions for Information and Communications Technology (ICT), including Geographic Information Systems (GIS), this should be more clearly demonstrated in the organisational structure.

### OPR Response & Recommendations on Issues Raised:

- (1) The support and acknowledgment of submissions is noted.
- (2) The OPR will adopt and advocate best practice in terms of public participation within the planning system and its statutory, legislative context including Aarhus Convention.
- (3) The setting of fees and charges is a matter for the Minister.
- (4) The Strategy Statement has been amended to reflect some aspects of this submission.
- (5) The NPF will be referred to in full in the final Strategy.



- (6) The Strategy Statement as made will acknowledge the degree of support received and has been amended to include reference to this support.
- (7) This issue has been addressed in the final version of the Strategy.

**[Submission no. 3, 4, 7, 12, 13, 18, 19, 29 & 30.]**

## 2.4 Our Work:

### **Forward Planning**

#### **Summary of Key Points:**

- (1) A number of submissions welcomed the independent assessment of forward planning functions which is seen to reinforce the importance of development plans to contain appropriate objectives on various policy areas including: climate change, archaeology, architectural heritage as well as compliance with the SEA process. Early stage engagement with the OPR would be welcome on this.
- (2) Some submissions refer to the oversight role of the OPR in the local authority Development Plan and Local Area Plan process and the need to ensure proper standards for the SEA Report.
- (3) In relation to *'Independent assessment of all local authority and regional assembly forward planning'*, concern was expressed in some submissions as to whether it is prudent to commit to a workload of providing recommendations on each and every draft plan, given the likely scale of workload in assessing all plans.
- (4) A number of submissions indicate that any assessment of plans should be strategic in its nature and focussed upon clear and transparent criteria based on legal requirements. The OPR's work should attempt to influence practice proactively and collaboratively and early engagement is advocated in the development of plans, perhaps through the establishment and involvement of 'gateway reviews' at an early stage of the plan making process.
- (5) The Strategy Statement should clearly set out what sanctions the OPR has when identifying deficient plans.
- (6) A number of submissions requested that the OPR should ensure the effective promotion of the architectural heritage provisions of the Act and should make reference to climate change auditing and the role of the Climate Change Advisory Council and the Sustainable Energy Authority of Ireland in relation to planning guidelines for building design.

#### **OPR Response & Recommendations on Issues Raised:**

- (1) The Strategy Statement, as made, will acknowledge the degree of support received and has been amended to include reference to this support.
- (2) It is acknowledged that while the SEA process is intrinsically linked to the plan making process, the plan-making authorities are the competent authorities for the purposes of Strategic Environmental Assessment.
- (3) The OPR acknowledge this issue and this will be addressed in further detail in the Plans Assessment Methodology under preparation, the Strategy Statement reflects that the assessment of plans is a priority task for the OPR.

- (4) The OPR will in the first instance provide the relevant planning authority with observations/recommendations with regard to how a draft plan should address legislative and policy matters. This will be based upon a Plan Assessment Methodology. The final Strategy Statement reflects these matters.
- (5) The Strategy Statement, as made, sets out the legislative role of the Regulator and the relationship with the Minister in respect of their powers of direction under section 31 of the Act.
- (6) The OPR acknowledges the importance of architectural heritage and the necessity for adaptation to climate change in development plan policies. These matters will be addressed in further detail in the Plans Assessment Methodology under preparation.

### **Reviews & Examinations**

#### **Summary of Key Points:**

- (1) One submission expresses concern about the current implementation of the Environmental Impact Assessment Directive and Appropriate Assessment process and indicates that this will be a key issue for the OPR in its examination of systems and procedures used by planning authorities.
- (2) One submission notes that, the OPR is empowered to make recommendations to the Minister in relation to planning legislation (including RSES), 'Section 28' Guidelines, directions and codes of conduct. It is felt this is an important role and is underrepresented in the Strategy. The role of the OPR as an independent body championing appropriate change is a real opportunity. The Strategy should emphasise and expand on the OPR's role / opportunity in this regard.
- (3) In respect of '*Examination of the systems and procedures*' (p.8) the draft Strategy Statement suggests that all engagement in this area with planning authorities will be of the Chapter IV type review, rather than the more general effectiveness assessment and a further consideration of the mix and type of reviews would be useful. In addition, the OPR should be referred to as a regulatory body rather than a standards body, as the latter could be misinterpreted as a standards setting body.
- (4) The OPR should commit to reviewing existing enforcement systems closely. The Regulator should require planning authorities to report directly to the OPR on the overall systemic management of enforcement complaints.
- (5) The OPR should ensure adequate focus on systematically working with local authorities in identifying the data that is needed and support the development of transparent and effective data gathering and analysis.

#### **OPR Response & Recommendations on Issues Raised:**

- (1) The OPR together with other stakeholders will work to promote best practice. The Strategy Statement reflects this submission.

- (2) The Strategy has been amended to reflect this submission and clearly sets out the statutory role of the OPR.
- (3) The Strategy Statement has been amended to clearly communicate the OPR's role as a regulatory body the Strategy has been amended to reflect the essence of this submission.
- (4) The Strategy Statement now includes a strategic oversight function in relation to the performance achieved by local authorities in relation to their enforcement activities.
- (5) This is a matter that will be further addressed in the Planning Authority Assessment Framework which will be developed in consultation with key stakeholders including local authorities.

### **Research:**

#### **Summary of Key Points:**

- (1) Reflection is needed of the scale of actions and targets under the UN Sustainable Development Goals 2015.
- (2) The establishment of a National Planning Knowledge Group, is welcomed by numerous submissions and a number of agencies/groups have actively sought to become part of this group and to contribute to same. It is considered that the OPR can provide the necessary leverage to deliver training, create synergies and provide education (including European networks and relationships).
- (3) A number of the submissions/observations have welcomed the OPR's role in driving national research, training, education and public information and have sought to support the OPR in its efforts and to share data/research that is being undertaken within all sectors of government including local, regional and national levels, semi-state organisations, educational and professional institutes and the private sector.
- (4) In respect of the OPR research role the Strategy Statement should clarify if the OPR is funding the research or doing the research itself. It should also clarify if there are linkages with private sector research and information.
- (5) An Bord Pleanála should be included for educational programmes as it forms an integral part of the planning system and planning authorities should be recognised as bodies that interact with public representatives, schools, community groups etc., in relation to raising awareness on planning issues.
- (6) The intention to maximise knowledge transfer between local authorities, regional assemblies and An Bord Pleanála is welcome. Consideration should be given as to whether other OPR stakeholders should contribute to this exchange, such as professional bodies and interest groups.

### **OPR Response & Recommendations on Issues Raised:**

- (1) This submission has been addressed through a greater reference to the role of the OPR in ensuring that the planning process plays its full part in addressing the environmental challenges faced today.
- (2) The Strategy Statement will acknowledge the degree of support received and has been amended to include reference to this support.
- (3) The support and acknowledgment of submissions is noted.
- (4) The funding of research will be by a combination approach including the direct commissioning of research and coordination with other stakeholders.
- (5) The Strategy Statement, as made, has been amended to reflect this submission.
- (6) The establishment of the OPR creates an opportunity to build on, co-ordinate and complement existing research and knowledge with various stakeholders. The Strategy Statement, as amended, reflects our broad range of stakeholders.

**[Submission no. 2, 3, 4, 8, 10, 12, 13, 14, 16, 17, 18, 19, 21, 22, 24, 30 & 31]**

## **2.5 Stakeholders**

### **Summary of Key Points:**

- (1) A large number of submissions received from key stakeholders including professional institutes, various government departments, regional authorities and local government have welcomed and acknowledged their role and input to the delivery of the OPR's Strategy Statement. A number of submissions seek to reference additional stakeholders such as the marine sector, research community, funding bodies and Central Statistics Office (CSO) together with service providers.

### **OPR Response & Recommendations on Issues Raised:**

- (1) The support and acknowledgment of submissions is noted.

**[Submission no. 6, 8, 11, 12, 13, 18, 26, 30 & 31 refer]**

## **2.6 'What you told us' - Consultation**

### **Summary of Key Points:**

- (1) It is suggested that the Strategy Statement should advocate video recording of pre-planning meetings in order to promote transparency and accountability in the planning system.
- (2) It is suggested that a standalone report is prepared on the consultation process that informed the Strategy Statement.

### **OPR Response & Recommendations on Issues Raised:**

- (1) This is a matter for the local authorities and An Bord Pleanála.
- (2) This report and analysis of submissions will be made available in the interests of accountability and transparency in line with best practice.

**[Submission no. 3 & 4 refer]**

## 2.7 Goals & Actions

### Summary of Key Points:

- (1) The goals section of the Strategy is clear and effective. The word “regular” is used across the goals and may be seen as vague.
- (2) General support for the OPR’s draft Strategy Statement, however, given problems in relation to retention permission and the implementation of the public rights of way by local authorities it is suggested that an additional goal is incorporated to the Strategy Statement to state:

*A critique of the effectiveness and fairness, in the broadest sense, of planning legislation.*

- (3) Whilst acknowledging that the goals have equal standing, it might be useful to rank those focussed on stakeholders and customers (3 & 5) ahead of the organisational focussed goals; particularly in light of the role that the OPR can play in improving public awareness about the planning system in Ireland.

### OPR Response & Recommendations on Issues Raised:

- (1) The Strategy Statement, as made, has been amended to reflect this submission.
- (2) The provision for retention permission and the preservations of public rights of way are set out in the Act and are matters for the legislator. The Strategy Statement is deemed appropriate in this regard.
- (3) The Strategy Statement has been amended to address this point and the goals have been re-ordered to reflect same.

**[Submission no. 5 & 22 refer]**

## 2.8 Goal 1

### Summary of Key Points:

- (1) It is recommended that An Bord Pleanála is included in the actions as being subject to review.
- (2) Some submissions requested that the relevant organisation be considered in establishing stakeholder fora.
- (3) A Planning Authority Performance Assessment Framework should aim to take an outcomes based approach which measures the quality of development on the ground and their impacts. The framework should be developed collaboratively with planning authorities and organisations including the professional bodies. It would be welcomed if this process could make the performance indicators more relevant to the quality of outcomes of the planning process.
- (4) The Strategy Statement should clearly differentiate the OPR complaints function from the work of the Ombudsman and other State and professional bodies. There is a need for clarity and transparency in respect of 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'.
- (5) The Strategy Statement should emphasise engagement at pre-draft stages in the plan making process, as once a plan is published at draft stage much of the content and direction has been developed.
- (6) It would be welcomed if the OPR would, as one of its research topics, consider the continual evaluation of the implications of the planning system and all its components on the resourcing requirements for planning authorities.
- (7) We would ask that it be noted that for members of the public who will naturally focus on the OPR when they feel let down by a planning action (or lack of), that there are numerous forms of internal and external review before the OPR would start to investigate a systemic failure. (Action 2)
- (8) There is concern and apprehension in relation to the fourth milestone, where it is stated that the OPR will *"work with contracted partners to deliver a high-quality service."* To this end there are concerns in relation to potential conflicts of interest and maintenance of integrity when using consultants/contractors. As such it is requested the OPR gives careful consideration to this topic, with the preference that such reviews are carried out, for the most part, by their own staff.

### OPR Response & Recommendations on Issues Raised:

- (1) The Strategy Statement, as made, has been amended to reflect this submission.
- (2) The Strategy Statement, as made, has been amended to reinforce the importance of the role of all stakeholders.



- (3) The OPR seeks to develop, with key stakeholders, a Planning Authority Performance Assessment Framework that includes process and outcome targets for performance and effectiveness measurement. The Strategy Statement is deemed appropriate in the regard.
- (4) The Strategy Statement, as made, has been amended to reflect this submission.
- (5) The OPR will, in the first instance, provide the relevant planning authority with observations / recommendation with regard to how a draft plan should address legislative and policy matters. This will be based upon a Plan Assessment Methodology. The final Strategy Statement reflects the matters raised in this submission.
- (6) The OPR with other stakeholders will identify knowledge shortfalls and create standards of best practice. The Strategy Statement is deemed appropriate in this regard.
- (7) The Strategy Statement, as made, has been amended to reflect this submission.
- (8) The Strategy Statement addresses this matter, moreover this is reflected in the fee-per-case procurement panel.

**[Submission no. 4, 10, 11, 16, 19, 24, 27, 29, 30 & 31.]**

## 2.9 Goal 2

### Summary of Key Points:

- (1) Irish Water welcomes the specific reference to engagement with Irish Water, among other stakeholders. Irish Water wishes to draw attention to the *Draft Water Services Guidelines for Planning Authorities* issued by the Department in January 2017 under Section 28 and one of the key messages: 'best practice guidance in relation to the interface between the planning and development functions provided by planning authorities and the delivery of public water services by Irish Water.'
- (2) Some submissions indicated that it is important that the on-line platform does not duplicate planning authorities efforts or cause confusion for the public in terms of making submissions on local authority development plans. All submissions relating to development plans should be directed to the relevant planning authority.
- (3) The regional assemblies should be referenced in the preamble to Goal 2.
- (4) Reference should be made to the existing complementary initiatives and potential synergies with the work of the OPR. In particular, the CSO and Ordnance Survey Ireland are key stakeholders.

### OPR Response & Recommendations on Issues Raised:

- (1) The Strategy Statement, as made, will acknowledge the degree of support received,
- (2) This matter is addressed in the final Strategy Statement, there is no intention on the part of the OPR to duplicate existing public consultation forums.
- (3) This is reflected in the in final Strategy Statement
- (4) This is reflected in the in final Strategy Statement

**[Submission no. 4, 9, 10, 24, 29, 30 & 31 refer]**

## **2.10 Goal 3**

### **Summary of Key Points:**

- (1) A large number of the submissions from stakeholders' welcome goal 3 and the associated actions and milestones. Many stakeholders wish to be represented on the National Knowledge Planning Group and offer suggestions in relation to areas for consideration in the research and learning and development programmes.
- (2) A number of submissions wish to underscore the role of the regional assemblies in driving innovation and learning.
- (3) Some submissions have sought clarity as to whether research will be funded and undertaken by the OPR alone.
- (4) Submissions indicate concern that the regulatory role of the OPR will be challenging and resource intensive and therefore recommend that measures are put in place to ensure that the regulatory work is not the detriment of the role of the Regulator in education and training.

### **OPR Response & Recommendations on Issues Raised:**

- (1) The Strategy Statement, as made, will acknowledge the degree of support received and has been amended to include reference to this support.
- (2) The Strategy Statement has been amended to reflect these submissions.
- (3) The funding of research will be by way of a combination approach including the direct commissioning of research and coordination with other stakeholders.
- (4) The OPR acknowledge this issue, however, notwithstanding the fact that the assessment of plans is a priority task for the OPR, the role of the Regulator in education, training and research is a core function that is also required under the provisions of the Act. Accordingly, this concern has been taken into account in the workforce planning and it is ultimately an operational issue which the OPR is conscious of.

**[Submission no. 4, 6, 8, 13, 16, 18, 21, 24, 27, 29, 30 & 31 refer]**

## **2.11 Goal 4**

### **Summary of Key Points:**

- (1) A number of submissions indicate that they look forward to collaborating with the OPR, where appropriate and necessary, on the continuous professional development programmes.
- (2) It is suggested that this goal and actions / milestones include an explicit reference to marine and coastal areas given that a National Marine Spatial Plan will be in place and operational after March 2021.
- (3) The action aimed at identifying the future impacts of the planning system on the environment is welcomed by a number of submissions.
- (4) In relation to Action 6 it is suggested that this should rest within Goal 3 – ‘Driving innovation and learning’.

### **OPR Response & Recommendations on Issues Raised:**

- (1) The Strategy Statement, as made, will acknowledge the degree of support received and has been amended to include reference to this support.
- (2) Whilst the legislative and policy context for marine planning is still evolving the final Strategy Statement makes reference to this.
- (3) The Strategy Statement, as made, will acknowledge the degree of support received.
- (4) The Strategy Statement has been amended to reflect this submission.

**[Submission no. 4, 6, 13, 18, 26 & 31 refer]**

## **2.12 Goal 5**

### **Summary of Key Points:**

- (1) A number of submissions support the fourth milestone which relates to the provision of clear and accessible information. It is suggested that this should permeate OPR publications and that the absence of jargon and acronyms is welcome.
  
- (2) A few submissions suggest that Goal 5 include specific reference to stakeholders, together with customers and suggest that customer satisfaction data be collected in partnership with relevant stakeholders.

### **OPR Response & Recommendations on Issues Raised:**

- (1) The Strategy Statement, as made, will acknowledge the degree of support received and has been amended to include reference to this support.
  
- (2) The Strategy Statement is deemed appropriate in this regard.

**[Submission no. 4, 10, 12 & 31 refer]**

## **2.13 Effectiveness**

### **Summary of Key Points:**

- (1) One submission sought clarity as to whether the Annual Report shall provide a full account of planning related research undertaken/funded in Ireland.

### **OPR Response & Recommendations on Issues Raised:**

- (1) The OPR can advise that it is the role of our Annual Report to provide details on planning research that the OPR is directly funding or engaged with and it is not intended to provide an account of research programmes that we are not directly involved in.

**[Submission no. 8 refers]**