

A Chara,

Please find attached my critique and follow up submission for the post publication of the Draft National Planning Framework phase of the process. Please confirm receipt of this submission by return.

Thanking you

Marc Mac Sharry TD *(See attached file: Marc Mac Sharry TD Revised Submission for National Planning Development November 8th 2017 As Submitted .docx)*

Constituency Office  
Knockaderry House  
Stephen Street  
Sligo

Ph 071 91 43616

---

**Post Draft National Planning Framework Publication Submission Marc MacSharry TD November 8th 2017**

**Original Submission no 0304 Submitted March 25<sup>th</sup> 2017.**

**Context**

The recently published Draft National Planning Framework fails to outline a strategic vision which will facilitate the optimum use of our national capacity which will allow our country to perform to potential. In fact, the draft creates provisions which sustain the status quo of imbalance where a culture of firefighting will continue to dictate action and resource provision at the expense of strategic resource planning and allocation which will alter the current unsustainable course of our nation.

The published draft fails to make strategic provision to ensure Ireland performs to potential. One can be forgiven for wondering did any submissions made during the consultation phase have any influence on the preparation of the draft plan as published. The similarity between the pre submission stage documentation produced by the NPF unit is remarkable in broad terms to the Draft Plan. This is regrettable and underpins the view that the plan has largely already been written. It is difficult to ignore the fact that more than 50% of submissions made in advance of the publication of the draft plan came from along what is known as the Atlantic Economic Corridor yet the plan as published display scant regard, little mention and is frankly absent of the strategic potential and importance of this region to the national effort over the next 25 years. As written the draft National Planning Framework is set to preserve the status quo. In order for the National Planning Framework to be effective and rightly guide the actions of the capital plan to follow it must be redrafted with a cohesive strategic vision with and all-Ireland focus rather than one predicated on the existing network established Cities with all of their current challenges in Housing Supply, Congestion and so on.

Decentralisation has been overlooked as a potential part of this strategy. This can alleviate existing problems in the Eastern Conurbation with Dublin at its centre by diversifying our national administrative burden throughout the regions. The benefits to this are immense and well established however as a tool it can also build critical mass in other locations such as the North West Region where the designation and strategic resourcing of a regional driver is essential if we are to perform to potential. Sligo self selects in this regard. Dublin is crucial in its role as economic driver of the country and second-tier cities need to be developed (Sligo as an example.) New institutional arrangements are required to promote bottom-up business development, which can be a key driver of future Irish economic development.

The key to sustainability is to utilise capacity to its optimum level to provide for present and anticipated socio-economic conditions. Planned growth and attendant infrastructural development must be underpinned by visionary economic programmes and targeted policies aimed at ameliorating a range of predetermined social needs. Such visionary, albeit radical, "planning" must be geared towards effective implementation and delivery systems that are broadly accepted as being positive, fair, democratic, rational and environmentally sustainable. However, as stated above the National Planning Framework Draft fails to do this. What can be seen are 'one size fits all' broad stroke policies, which fail to identify challenges and solutions on a regional basis with a national benefit and therefore much of the country will not be equipped to realise its potential. This will limit national output potential and in real terms our ability to grow and perform without adding to the existing problems in housing supply, congestion etc in Dublin and other larger Urban Centres.

### **Urban development in the North-West**

Sligo as capital of the North-West region is completely overlooked in terms of urban development. This is outlined under section 3.3 (page 44) of the NPF Draft, which states that the strongest urban influence is north Galway City and Derry City (A city which in the absence of the NI Executive or a United Ireland is governed and dependent on resource provision on the Tory Party in Whitehall. Hardly a strategic vision for the Republic of Ireland at this time despite my republican aspirations for our reunification). The section dedicated to urban development in the North-West does not acknowledge or mention urban areas such as Sligo which clearly has the potential as a new city. It is ideally placed geographically to act as driver for the North West Region. Already a thriving administrative regional capital, its potential has never been truly acknowledged nationally in the context of strategic resource allocation. Land zoning and services allow for up to 26000 new dwellings. With proportionally less than other locations Sligo can be equipped to perform to its potential as a regional driver. The North West region, servicing an existing population of 250000 heretofore dismissed and ignored as a pain in the national side can begin to make a growing and sustainable contribution to the national effort, not just economically but also in promoting the realisation of healthier wellbeing for citizens in the decades to come.

### **Transport**

As discussed throughout my original submission the absence of motorway access has limited the use of the capacity the North-West offers us as a region. Upgrades to existing routes in addition to the development of new routes in order to ensure future prosperity to the region is essential. As it stands the North-West is hampered with no motorway connectivity to either Dublin/the South of Ireland and Derry and Belfast to the North. The virtual border which exists north of the Dublin-Galway line and west of Mullingar must be removed. Not only does this create the obvious social and economic problems associated with poor roads and infrastructure, it will also have future implications for the North-West. An M4 from Kinnegad to Sligo, an M17 Galway to Sligo and cross-

border connectivity must be included within the NPF as vital enabling infrastructure. This will enable the North-West to begin to preform to it's potential as well as improving the life and wellbeing of those living in the region. The A5 must also be included as critical enabling infrastructure in order to ensure that a direct link is made between the M1 Dublin Belfast and Letterkenny through Omagh Co Tyrone. As the implications of Brexit are still unknown, it is essential to ensure that transport links between North and South are prioritised. The provision of an M4 through to Sligo, M17 from Galway to Sligo and M15 & 16 must be prioritised resourced and realised in the mentioned order and within the 20 year life span of the NPF if we are truly serious about reaching our national potential and mitigating against the challenges facing Dublin and the East Coast Conurbation from Dundalk To Wexford and Dublin to Navan Mullingar and Carlow Town. The provision of a motorway from Sligo to Galway cannot be underestimated in terms of its capacity to enable Ireland West Airport at Knock to act as a catalyst from indigenous and foreign investment in enterprise and tourism.

## **Environment**

Protection of the environment for future generations is critically important. To this end it is essential that we mitigate against damage already done to the water table, air quality, coastal erosion and so on. Fracking must be outlawed in line with the legislation recently passed by the Oireachtas. While instinctively unpopular and resisted by all of us the incineration experience in other countries and other cities, such as Austria and Vienna with the use of incineration for electricity generation and district heating warrants a clinical look at the pros and cons of such an approach in order to way up the direct and indirect problems against the direct and indirect benefits. The renewable heat initiative in the north of Ireland while infamous in media now for all the wrong reasons would be a scheme worth introducing in the Republic with appropriate limits, learning from the mistakes in the North of the Island. The growing of willow should be encouraged and incentivised both for the pellet burning potential but also the potential this species has in absorbing waste water.

## **Housing**

The NPF Draft gives very little indication of any viable or real solutions to the housing crisis which exists in Ireland today. The problem of one off housing which has negative effects on an economic and environmental level is not addressed and is a problem being faced in the North-West. To add to this, areas where new homes are being built already suffer from a lack of amenities such as education, broadband, childcare etc. The NPF Draft gives little details of any proposed response to the complex issues which exist within Rural Housing. For example, 85% of Planning Applications made in Leitrim in 2016 were one-off builds and these were mainly built on the periphery of main towns where there is already an outcry for government funding for education etc. No incentive has been made towards the proposed shift from one-off housing to incentivised urban house and apartment dwellings.

The draft proposes to combat the issue of sprawl into the countryside by developing policy which ensures 40% of new housing is developed in already built-up centres, however taking into account the lack of infrastructure available to the North-West, this is not viable. An appropriate balance must be struck to facilitate rural living which supports the rural economy in line with our culture, heritage and the will of the people.

Planning policy must make it attractive for people to wish to live in towns and cities. Planning Acts sought to ensure that a mix of social, affordable and private housing would prevail. Average social housing mix in urban areas nationally is in or around 14% though Limerick, Cork and Sligo are all above 30%. This has discouraged the development of private home construction within the boroughs of these centres forcing many to seek planning in nearby rural locations or adjacent villages. The experience shows one size does not fit all and so local development plans must be permitted under legislation to take cognisance of the existing social housing ratio and provide for development which promotes the optimum balance. This is not to reduce the level of much needed social, affordable or traveller accommodation when so much is needed rather planning must ensure that an adequate mix and balance is achieved and this must take cognisance of the existing percentage breakdown. One size does not fit all and there must be an acceptance that we are not dealing with a blank canvass.

Against a backdrop of an unprecedented national housing crisis the existing stock of zoned land nationally and in particular where local authorities re-designated land as part of a strategic land reserve for longer term consideration, flexibility should be given to permit shovel ready serviced lands the potential to proceed in order to provide housing in the shorter term. City life and in particular Apartment dwelling within larger towns and cities should be incentivised. Such incentives could include waivers on property tax, refuse charges, broadband and other service charges which if met by the state would encourage home owning apartment dwellers to make the move from one off or estate housing which would benefit the state. As an aging population this may be attractive to many of us on the grounds of security and ease of access to health care and amenities

### **Housing – Rural Ireland**

This draft does not take into consideration the importance of providing sufficient support to those living in rural Ireland and the various challenges that they face in the forthcoming years. Families in rural Ireland have been failed by the draft, as their needs have been overlooked.

As mentioned above It is of critical importance that we respect and support our culture in Ireland which has for centuries leant itself to small clusters of housing throughout the Country. Rural Ireland was always home to many 100,000s of families. It is important that we balance future growth and the resources to support this with the responsibility to respect and support the will of our people. People have always lived in the Country side and many will always want to. While seeking to attract more people for more sustainably supported living in urban centres by enhancing the life experience of villages, towns and cities we must absolutely support the cultural fabric rural Ireland exists on and that people live and will continue to want to live there.

### **Tourism**

The National Planning Framework Draft outlines very few specifics as regards tourism, particularly within North-West Region where so much unrealised potential exists. While reference is made to the Wild-Atlantic Way, no tangible measures are provided to increase tourism in North-Western counties, which as previously stated has a massive potential for Arts, Heritage, Archaeology and History together with traditional forms of tourism. As a whole, the draft is silent on any strategic provisions for the continued development of the Wild Atlantic Way, the reference made to National Heritage and the roll it can play in our tourism sector is minute notwithstanding the fact that Ireland's already established National Monuments and National Heritage sites have fallen into disrepair as a direct result of a lack of funding.

The draft makes no provision for measures to improve coastal leisure activities. The matter is discussed as part of section 6.2 which excludes any mention of maintenance and development of slipways, piers etc. Key access infrastructure to promote all water based leisure and commercial activity needs to be prioritised with adequate slipways, piers and berthing facilities at all coastal and inland waterways. To use Sligo as one example, there are inadequate facilities at a variety of locations within the county namely, Easkey, Portavad, Culleenamore, Rosses Point, and the tidal nature of Raughly and Mullaghmore on the coast while Loughgill and many other lakes and rivers have totally inadequate access for people and craft whatever the activity. This is replicated in many counties nationwide. The marine commercial and tourism potential relative to our coastline is totally underutilised and ignored in its potential to facilitate economic activity.

Culture and the Arts are a tremendous asset in Ireland. In many ways internationally, it's our unique selling point and we must intensify our support for and focus on the area. Land of saints and scholars a plethora of playwrights, poets, authors, actors, artists, sculptors, musicians, song writers and national monuments provide us with a resource the bounty from which we have not even begun to truly realise. Educational, Literary and Archaeological Tourism are immense in a global context and in considering the draft plan it appears we have neither the inclination or the supporting infrastructure to truly realise its potential at this time. An audit of the top 20 brands across all of the arts should be identified; interpretive centres developed at the appropriate regional locations and marketed heavily so that we can make a start at following a plan to reach our potential in this regard. Marine Archaeology is all but unknown in Ireland yet the very substantial graveyard of ship wrecks within Irish Waters is truly remarkable, none more famous than the 26 wrecks of the Spanish Armada sprinkled from Off the Antrim Coast to the Dingle Peninsula and 3 clustered at Streedagh Co Sligo very close to shore. A national centre for marine archaeology needs to be developed together with a national maritime museum to protect these sites and document this valuable resource not least begin to realise the tourism and commercial potential it has. We are rich in national monuments though many are under threat due to lack of appropriate resources, some are on lands not within state control and many are in danger of disappearing altogether. Appropriate resources need to be made available to ensure the protection of these monuments through the state acquiring important national monuments not resting on state owned lands and also to effectively manage a staggered access programme to ensure that certain monuments are 'rested' from public access for periods to protect their further decay. Again the tourism potential offered by correctly caring for and managing access to our national monuments can be an excellent economic contributor.

### **Land Use and Agricultural – Rural Ireland**

As stated in my previous submission, agricultural activity is a vital economic activity throughout rural Ireland. When examining this in the context of the North-West region and the National Planning Framework Draft, faults are evident. While the Common Agricultural Policy provides certain supports by way of the Basic Payment Scheme, Area of Natural Constraint Scheme, REPs, AEOS, GIAS among others there is a need for further supports and protection of the current supports if we are to keep food production at optimum levels to ensure food security.

The Draft centres its proposals around agricultural activities on a need to adapt to modernisation and restructuring market development. However, this cannot be possible without the incentive of young farmers, which have recently seen a substantial cut to the funding of the Young Farmer Scheme over the past 2 years (a dramatic cut from €25 million to €5 million since 2015.) Increasingly restrictions and cuts to schemes such as this will in turn defer young farmers from continuing to practice agricultural activities as many have already had to end leases to land they can no longer afford to rent. This will result in land abandonment and a variety of other issues such as the sale of

land for the purposes of forestry. As well as restoring cuts, further support is needed to develop and maintain agriculture in the North-West. As previously described as 'the engine room for our nations beef industry' – with 40% of weanlings being produced in the North-West, it is essential to ensure supports, funding and grants are made available to farmers who may due to conditions common to the North-West (smaller holdings, longer winters, poorer land, weather etc) be at a disadvantage to farmers in other parts of the country.

Already where our national target for afforestation is 35%, lands are being bought up in this region for the purposes of forestry edging out local farmers seeking to increase scale due to better subsidies. Forestry is of course a positive carbon eater however it needs to be spread nationally rather than over focused within a certain region at the expense of potentially the very existence of more traditional forms of farming in the region including suckling, dairying and finishing.

### **Strategic Commercial Clustering & Employment Support.**

The United States whether by chance or design have enjoyed a certain success through economic clustering. Government and administration in Washington DC bordering Virginia and Maryland, Heavy Manufacturing – Michigan, Services – Georgia, Financial Services- New York, Pharma & Medical Devices Illinois & Massachusetts, Information Technology in California and Agriculture and Farming in the Great Plains. The NPF should prioritise similar clustering following the centres of the Greater Dublin Area, Waterford, Cork, Limerick, Galway & Sligo as regional drivers, Employment supports and incentives should promote such a policy while the efforts of IDA & Enterprise Ireland should mirror such a clustering vision. Indigenous Industry must be supported in a much greater way than heretofore. The SME sector remains the driving force of our economy despite the higher profile of State Supported Foreign commercial enterprises. A priority scheme must undertake a clinical examination as to the state related costs of enterprise establishment and continuity. The regulatory burden, rates, taxes and licencing requirements and all state related costs must be reduced and balanced with the capability and potential of business types, size and geographic location relative to the employment need at that location.

### **Infrastructure.**

Key infrastructure required for Ireland for the next 20 years should be prioritised to support the key regional drivers namely the Greater Dublin Area, Cork, Limerick, Waterford, Galway and Sligo. They must include motorway connectivity, improved public transport, to each other and the Capital City. Each region requires availability of 4 levels of education including the established universities being added to with the expansion and upgrading of Waterford IT and the realisation of the Connaught Ulster Alliance promoting a multi campus North Western University of Technology headquartered in Sligo together with the NUIG Campus at St Angelas Sligo. A critical mass of acute health services including all the adopted national clinical programmes including the national cancer control programme and cardiology together with the other disciplines must also be provided on a satellite basis linked to a national centre at a minimum.

### **Healthcare**

As stated in the previous submission and under the heading of infrastructure, access to specialist medical facilities has been a longstanding issue in the North-West. The draft gives no indication as to whether upgrades to roads in the region (particularly N4 to M4 North) will make healthcare facilities

more accessible to those living in the North-West. As stated, a journey of no more than 1.5 hours one way or a 3 hour round trip commutable journey must be implemented. The draft does not contain any proposals specific to healthcare in the North-West other than a vague outline of proposals for improvements to hospitals nationally. Clearly, a critical mass of services already exists in Dublin and where surgery is not possible to regionalise all post-operative treatments must be with the exception of cardiology which demands 90 minute turn around following an episode and so demands regional access at each of the mentioned centres. Problems within healthcare facilities greatly vary from region to which the draft plan fails to acknowledge or address.

The draft fails to include provisions for implementing policy which tackles issues such as obesity and deteriorating health in Ireland today. Through improved accessibility the enviable suite of outdoor amenities regardless of weather can promote and facilitate a healthier life style for all. A cultural shift in diet, alcohol use and patterns together with exercise will not be enhanced by preserving the status quo. Better access and interconnectivity nationwide will bring all amenities closer. However the draft is silent on provision to realise this potential.

## **Brexit**

The draft claims that the North-West “will enhance the competitiveness and attractiveness of areas most exposed to the potential impacts from Brexit.” This is a ridiculous claim in the absence of measures some of which are outlined throughout this and the previous submission. As things are the threat of imminent Brexit has had an appalling impact on Agricultural Exports, Tourism numbers from northern counties and the UK while in Sligo, to take but one example, uncertainty and concern about Brexit has led to a drop of commercial planning applications of 40% in an area which already has the highest proportion of vacant commercial premises in the country.

Reverting back to the topic of tourism - When tourism enterprises are surveyed about performance across markets, the North and Britain clearly stand out as areas of concern. Half of the accommodation providers surveyed are reporting British business down and two in five have experienced a drop in tourists from the northern counties. The proportion of those businesses impacted rises in northern counties - Cavan, Donegal, Leitrim, Longford, Louth, Mayo, Monaghan and Sligo – which are traditional beneficiaries of these markets.

In terms of the Sterling/Euro exchange rate, about two thirds (68%) of accommodation businesses in Northern counties say they have been affected by the exchange rate this year – as compared to a lower proportion (44%) of accommodation businesses in the rest of the country.

This hard evidence is ignored by the Draft National Planning Framework, choosing to take the approach that incorporates Brexit as a simple issue which can only have a positive impact for Ireland and the North West. Brexit poses enormous challenges to integrated strategies on economics, climate change cooperation, social programmes and so on between North & South. Again, improved access is key to the realisation of potential in this regard. The M1 to Belfast is secure and of great assistance but equally the provision of a motorway M1/A5 and M15 / M16 must be an essential part

of a plan to realise the true potential of an all-Ireland approach irrespective of how the implications of Brexit play out.

### **Implementation.**

The challenge to implementation is the provision of adequate resources and how we prioritise. The focus on firefighting needs to be replaced with the provision of capacity before demand. This requires money. Nationally our debt to GDP ratio is heading south of 70 %. This is indeed welcome and a notable turnaround when measured against the all-time high of 135% in the 1980s and heading towards 120% during the recent crash. EU rules seek all to have a much lower ratio and to meet targets which are not conducive with a country seeking to undertake a strategic planning and capital investment strategy to prepare our country to grow and develop to our potential and thrive in a sustainable manner which improves everyone's health and quality of life. Capital investment in the order of 10bn per year over the course of 20 years is the level which is likely required. With the arrival of historically low bond yields the good offices of the National Treasury Management Agency through Government /Infrastructure bond issue at long term intergenerational terms of 100-150 years to meet some of this demand is necessary. The impact on our debt to GDP ratio and deficit/surplus current account expectations in line with EU rules means that doing so may not be possible. A correct and manageable balance of capital expenditure from own generated resources and bond issue specifically for enabling infrastructure should be examined and dispensation from prohibitive EU rules which prevent this should be sought. In the absence of an unlikely round of additional structural funds from the EU it is hard to imagine how as a nation we may be able to trade our way to the provision of 10bn or its equivalent in capital expenditure every year for the next 20 years without such an approach. Negotiation on this level is required as mentioned with the EU and perhaps the targeting of 5bn from own resources for capital expenditure and the borrowing of 5bn for the exclusive purposes of providing critical infrastructure to support the plan. Given the road infrastructure projects necessary there is merit in the examination of whether Transport Infrastructure Ireland or a new state entity could undertake the design build and management of all new motorways given the tolling returns over time. This may be better than subcontracting however difficult it may be given the revenue streams this could provide for the exchequer in the medium to long term.

The success of the potential of this plan is to ensure the correct geographical spread and the ambition to identify the potential of each region and lay out a plan and resources in services and infrastructure to allow each region to perform to its potential driven by the regional growth centres and supported by adjacent towns and villages. Ambition is vital in drawing up the detail and this should not be hampered by the current lack of resources. Once the plan potential is accepted and the resources and services required to reach that potential are identified solutions can be considered for financing.

### **Conclusion.**

In the final analysis the success of any plan can only be measured by how it has provided the template and environment to reach our potential. In the foregoing I have outlined some of my suggestions of how this might be achieved. Access, Connectivity, Economic and Environmental Sustainability and the realisation that we must seek to use all of our available capacity as a nation are central themes. Those ultimately adjudicating on the shape of the final plan must be



ambitious. Equally they must not be swayed by political expediency or the current fiscal constraints. To do so will inevitably scuttle the potential for success. Resource solutions can and will be found to progress any agreed plan. The draft plan as published was underwhelming in the extreme and effectively silent on the many valuable and informed submissions made in advance of its preparation. I can only hope that following this second round of submissions that due cognisance is given to their contents and an ambitious and thoughtful plan can be published to guide our future success.

Marc Mac Sharry TD

Knockaderry House

Stephen St