



Comhairle Contae Liatroma Leitrim County Council

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N41 PF67

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10th November 2017

Leitrim County Council submission to the draft National Planning Framework Overview

Leitrim County Council welcomes the opportunity to make a submission to the draft National Planning Framework (*Ireland 2040 - Our Plan*) and to seek the influence the final strategy.

At our Council meeting of Monday 6th November 2017 where our Elected Members considered the draft National Planning Framework and a draft of our submission to same, there was widespread agreement that it was difficult to foresee the positives for Co. Leitrim in the Framework as presented. The Strategy reinforces the dominance of Dublin on a national level with the development of regional cities seeking to create a critical mass to counter over time the effect and dominance of our national capital. The Strategy does little in concrete and visible terms of seeking to address the decline of rural towns and villages of our County whilst the congestion faced in our cities is increasing on an ongoing basis. The ability of our larger rural towns to accommodate greater levels of population than will materialise as a consequence of this draft Framework fails to avail of the considerable social and physical infrastructure which exists in such centres. The consensus amongst our Members is that the Framework is overtly dominated by urban considerations and requires significant '*rural proofing*'.

Further, the lack of detail for the intended areas of growth at levels below the 5 no. stated cities effectively means that there is no visible strategy contained therein for the entire North West region with all of the cities located south of a line from Dublin to Galway and Galway being located on the southern periphery of same. The further development of Galway as a city has no direct or indirect benefits to the population of Co. Leitrim. The imbalance of growth which has been described as '*business as usual*' in the Framework will, in the opinion of the Elected Members, continue unaffected by this Framework.

The dissatisfaction of the Elected Members that no formal consultation was undertaken by the Department with their grouping was also voiced at our meeting.

The structure of the draft National Planning Framework is markedly different from its predecessor, the National Spatial Strategy, and the decision to publish such a strategic framework without an accompanying series of maps was unexpected. The Framework sets out the likely future change in Ireland and the spatial pattern required for effective and co-ordinated investment in a range of

sectors to best accommodate and support that change. Limited information is provided to understand what the spatial patterns of this growth will be as there is no effective guidance below the 5 stated cities. The absence of such maps is perhaps understood in the context of the extent of decision making which is being effectively delegated to the Regional Assemblies in the preparation of the forthcoming Regional Spatial and Economic Strategies. The inclusion of the word '*spatial*' would indicate that the latter strategies will be more definitive in spatial terms than the National Planning Framework. It would have been expected that the higher level framework would have provided more certainty for the urban hierarchy to be pursued in the regional strategies.

The new National Planning Framework must provide a robust basis for integrated national planning, pulling together relevant Government policies and investment on national and regional development. However, the final framework must also ensure that the future focus of economic development, enterprise and employment addresses the existing imbalance which is centred on the Greater Dublin Area and to a lesser extent on the other large cities of Cork, Limerick, Waterford and Galway. This should permeate to state assisted employment and the implementation of a regional employment strategy by the IDA and Enterprise Ireland. The draft Framework in its current composition would not indicate that such regional employment strategies are forthcoming and should be addressed in advance of work commencing on the Regional Spatial and Economic Strategies.

The Framework was presented on the basis that it will address all parts of Ireland, avoid the perception of '*winners*' and '*losers*' but avoid unrealistically treating all parts of the country in the same way. The new National Planning Framework needs to ensure that the potential of all areas are realised, relative to their capacity for sustainable development and to prioritise rural development and address the declining small towns and villages of Co. Leitrim (and other midland and western Counties) where businesses and essential services are closing down with vacancy and dereliction levels rising. The strategy seeks for these small towns to reinvent themselves to bring greater vitality but there are no concrete examples given as to what this should be as? The final Framework needs to provide greater detail of what these new roles should be rather than appearing to predominantly rely on additional infill housing. Small towns and villages developed around the provision of services to a wider hinterland and with the development of supermarkets in larger towns allied to the greater availability of enhanced personal transport, less and less local people avail of traditional retail in these centres which has had a spiralling effect on the viability of other local service providers.

Leitrim County Council requested in our initial submission that parity of esteem for Carrick on Shannon, with all other county towns was provided for in the resultant urban hierarchy contained within the Framework. The draft Framework presents all of Co. Leitrim and indeed the vast majority of the Northern and Western Assembly as a rural area in its entirety. The exceptions to this are Galway as a designated city and the large urban towns with a population greater than 10,000 population of Letterkenny, Sligo, Ballina, Castlebar and Cavan (the area of Athlone in Co. Roscommon would also fall into this category). It is considered that the status and range of functions within County towns should be recognised within a revised urban hierarchy than presented in the draft Framework. It is considered that such County towns should have indicative targets included as potential regional growth drivers for their surrounding catchments. The role of Carrick on Shannon and the range of services provided therein is markedly different to similar sized towns within the Greater Dublin area. The final Framework must recognise and not seek to stifle such potential. It is considered that similar to the manner in which a dedicated growth rate is identified for towns with a population greater than 10,000 population – of the region of 20 – 25% - such a growth rate should be specified for County towns.

Indeed, Leitrim County Council would indicate that the ‘Hierarchy of Settlements and Related Infrastructure’ on page 77 should be reconsidered as with the exception of ‘Park N’Ride’, ‘A&E Hospital’, ‘Minor Injuries’, ‘Outpatient’ and ‘Waste landfill’, all of the other related infrastructure are present in Carrick on Shannon which has a recorded population in 2016 of 4,062 population (including Cortober, Co. Roscommon). Concern would be expressed that individual Government Departments may use the population categorisation within the National Planning Framework as a significant basis for decision making for services such as libraries, schools, Primary Health Care, etc.

Major Urban Centres in Northern & Western Regional Assembly Area

Urban Centre	2016 Population	NPF Growth%	Target
Galway	80,000	50-60	120,000 – 128,000
Letterkenny	19,300	40	27,020
Sligo	19,200	40	26,880
Castlebar	12,000	40	16,800
Ballina	10,200	40	14,280
Cavan	10,200	40	14,280
Total	150,900		219,260 - 227,260

The above table presents an extrapolation of the existing population levels and targets to be pursued for Galway and the other large towns in excess of 10,000. This accounts for a very considerable proportion of the projected population growth in the Northern and Western Regional Assembly area.

On this basis and having regard to National Policy Objective 14, the population of Co. Leitrim should expect to increase by 15% over the life of the National Planning Framework as the entire county is considered a ‘rural area’. The population target therefore which Co. Leitrim should expect in a resultant Regional Spatial and Economic Strategy is 32,044 (2016 Population x 0.15 = 4,807 people). The National Planning Framework has a 23 year horizon which translates into an annual target of 209 persons per annum for our county. On the basis of the recorded average occupancy in the 2016 Census of 2.55 persons per household (accepted that this is falling) this would imply a requirement of 82 no. additional households per annum or 492 housing units over a 6 year Development Plan cycle. This is a marked reduction on the existing Core Strategy of the Leitrim County Development Plan 2015-2021 which projected that 1,043 housing units would be built over the period of the plan of which 262 units would be in Carrick-on-Shannon. Whilst housing completions are lower than the projections contained in the Core Strategy, they would be almost double of what we could expect from the Regional Spatial and Economic Strategy. This is more of a concern when one considers that there is no effective construction of new multiple residential developments in the county.

County Leitrim House Completions 2005-2016

Year	2012	2013	2014	2015	2016
No of Houses Built	86	90	86	137	136

Source: Department of Housing, Planning, Community & Local Government database which is based on ESB connections.

It is respectfully considered that the scale of additional population growth being provided for to the Northern and Western Regional Assembly area is simply too low for the horizon to 2040 as outlined above.

The status of Sligo has been significantly downgraded in the draft National Planning Framework and Leitrim County Council considers that the lack of recognition to Sligo as a nationally important centre has implications for the upgrading of the existing N4 National Primary Road and of the existing Sligo – Dublin rail line both of which serve south Leitrim and both of which require significant improvement to include inter alia, flood resilience. It was anticipated that a National Planning Framework would not alone retain the national importance of Sligo which was designated as a national ‘Gateway’ in the National Spatial Strategy but would stipulate tangible and measureable targets for synergies being realised for towns in the next tier below such as Carrick on Shannon and perhaps Manorhamilton. Through Sligo IT and the proposed Technological University status for the North West appropriate educational linkages would further assist in the attractiveness of the region to further business investment.

There is no indication in the draft National Planning Framework of the timing of publishing the 10 year National Investment Plan or indeed the nature of such plan. It is considered imperative that the Regional Spatial and Economic Strategies must inform the National Investment Plan from an infrastructural investment viewpoint as other than the 5 designated cities, there is no indication of the level of investment which could be expected for the northwest. Leitrim County Council would request that there are firm statements of commitment included to upgrade the existing N4 to Motorway standard including the bypassing of Carrick on Shannon. It is considered that the existing text in ‘Enhancing Regional Accessibility to the North West’ – *“Upgrade northern sections of the N4 route”* or elsewhere *“incrementally improving access to the north west from Dublin and from other cities to the south”* are too vague and non committal. The final document should specify what standard the N4 route is being designed to. In addition, Leitrim County Council would require improvements to the N16 National Primary Road which links Sligo through Manorhamilton as far as Blacklion in Co. Cavan to connect with the A4 as the main travel route from Sligo to Belfast.

Additional employment opportunities must be developed in the larger urban centres of the County facilitated by high speed broadband to ensure that more of our resident population are afforded the opportunity to work within reasonable distance from their homes or work from their homes;

Minister Naughton’s foreword indicates that *“the National Planning Framework sets a strategic development context for the roll-out of high speed broadband networks in rural Ireland, energy systems and infrastructure, and the sustainable development of our natural resources.”* National Policy Objective 22 in turn seeks to support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills development for those who live and work in rural areas. Leitrim County Council as the most rural county in the country supports this policy objective but again requests the expedited rollout of the National Broadband Strategy which is considered essential for rural counties such as Leitrim to become competitive in attracting and retaining enterprise, employment, commercial and residential uses. There remain concerns that the length of time being afforded to competitive dialogue will cause delays to the rollout of the strategy and other possible delays due to the need to undertake Strategic Environmental Assessment and Appropriate Assessment of Ireland’s Broadband Intervention Strategy. These concerns should be addressed as a matter of priority rather than using words such as *‘support’* and *‘facilitate’*. A definite timeframe to roll out this key infrastructure must be committed to by Government.

Leitrim County Council welcomes the concept of the competitive bid based National Smart Growth Initiative although limited detail regarding the scope of the initiative, extent of budget, duration, etc. are provided. In particular, as all of County Leitrim is designated as a *‘rural area’*, it is encouraging that this is recognition of the demonstrable need to strengthen and reinvigorate small towns and rural areas to counteract the corrosive effects of population decline. It would be hoped that funding

may be made available to assist local people in trialling Zero Discharge Wastewater Treatment & Disposal Systems in Co. Leitrim. This is a divisive issue for not alone Co. Leitrim but also for surrounding counties with similar underlying soils with poor percolation characteristics.

Concern is raised with regard to the process of identifying rural housing need as outlined in the draft Framework following the repercussions of the Flemish decree. In particular, the concept of '*demonstrable economic need*' as an alternative to '*local housing need*' as the relevant policy determination is questionable and removes any consideration of social ties to an area. It is presumed that the outcome of the Flemish decree removes consideration of familial ties to a locality. It is also of concern that the draft Framework appears to consider that pressure for urban generated rural houses applies only to the environs of cities and towns greater than 10,000 population and that it shall be a matter for individual Local Authorities thereafter. The dilution of the existing Rural Housing Guidelines to the extent now proposed in the draft Framework should be reconsidered as it will have the inevitable effect of increasing the price of sites for persons who would have intrinsic social ties to an area.

The National Planning Framework acknowledges that in areas of poor soil / marginal land as found across the majority of Co. Leitrim that such land are more suitable to afforestation than to more traditional forms of agriculture. The use of Government incentives seeks to increase long term timber supply to support the development of a sustainable processing sector and offers significant carbon sequestration potential. However, the private afforestation levels being undertaken in Co. Leitrim is beginning to have profound and perhaps unintended social consequences. Investors are pricing farmers out of the market who seek to extend their farm holdings on the basis of the incentives available and further, there are isolation issues occurring for rural dwellers whose residential properties are planted effectively on all sides. As to date, all of the afforestation is exempted development with the exception of the creation of new entrances onto public roads, the Planning Authority has no effective role in ensuring the appropriate and sustainable siting of forestry developments other than in commenting on planting applications lodged to the Department of Agriculture, Food and the Marine Forest Service. It is considered that the section on Forestry requires modification to acknowledge and seek to prevent the social and visual consequences of further afforestation whilst accepting the sectors undoubted potential as a carbon neutral and renewable energy source.

The Elected Members of Leitrim County Council have formally written to the Minister for Housing, Planning, Community and Local Government requesting that the current exemptions which apply to initial afforestation, to thinning, cutting and harvesting of trees and to internal forestry roads be removed and such development would require planning permission. Further, whilst the land in counties such as Leitrim is marginal, it still allows farmers to make a living from the land albeit in many instances on a part time basis supplemented by other off farm income. However, the retention of young farmers and their families in rural areas in turn supports businesses in villages and small towns along with keeping vital services such as rural schools in place. However, once lands are planted for forestry, they are effectively lost to conventional farming. The Council would therefore consider that the safeguarding of rural communities would be afforded an equal if not greater weighting in this Framework than the need for further forestry on marginal lands.

The draft Framework states that "*Rural areas have significant potential in these sectors and as digital links and opportunities for remote working and new enterprises continue to grow, they will increasingly have the capacity to accommodate employment focused on ICT based industries, multi/media and creative sectors in areas such as agri-tech, tourism, transport and in particular, an added value bio-economy and circular economy*". It is surprising that there is no reference to Creative Ireland which is the Government's Legacy Programme for Ireland 2016 – a five-year

initiative, from 2017 to 2022, which places creativity at the centre of public policy. It is considered that the creative arts and culture references in the Framework are underwhelming and require reinforcing as such sectors are of particular significance in Co. Leitrim and other rural counties.

The National Planning Framework must seek to minimise the impact for border counties such as Leitrim of the impending departure of the United Kingdom from the European Union with regard to the free movement of people and goods. The future of successful cross border and all island initiatives such as Waterways Ireland established under the British-Irish Agreement Act of 1999 to manage Ireland's inland navigable waterways is uncertain.

Is it anticipated that the Office of the Planning Regulator will be in place before the preparation of the Regional Spatial and Economic Strategies is completed as this is the authority with responsibility for monitoring compliance with the National Planning Framework. A commitment in this regard in the final Framework would be welcomed although noting that the enabling legislation has not yet been approved.

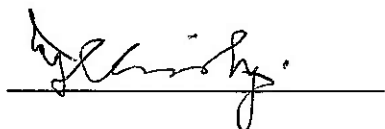
Leitrim County Council has in place a High Level Advisory Group (HLAG) consisting of members who have experience in business and economic development. The Group meets a number of times per year to advise and support the Council in pursuing objectives for the continued growth of the County. The HLAG discussed the importance of the National Planning Framework for the future development of the County at its most recent meeting. As an outcome of that meeting a number of key items were agreed as fundamental to the future growth of the North West Region and to Co. Leitrim in particular.

1. Access to the Region: The HLAG were strong in their identification of access to the region as the central most important component to the future growth of the region and in this regard strongly urge the immediate prioritization of the road access from Dublin to Sligo to be upgraded to Motorway standard and status. From their experience having an efficient access is key to making the region attractive for investment and population growth. There is a perception that once you leave the N4 Dual Carriageway at Mullingar that the quality of transport corridor reduces significantly.
2. Broadband: The Group are also of the view that the fast and effective delivery of high speed broadband across the region is of urgent need
3. Education: The Group strongly supports the initiative for Sligo IT to secure technological university status. This status is essential to build on the excellent work of the college and for the future attraction of the region to further inward investment and the support of existing business to grow effectively within the region.
4. Foreign Direct Investment: There is need for an accelerated drive to secure FDI decisions in favour of the North West Region with Carrick on Shannon as a case in point that despite a ready to go facility no FDI has occurred on the Carrick Business Campus.

Leitrim County Council requests that you take this submission into account in the formulation of the new National Planning Framework and acknowledges the difficult task faced by those charged with its preparation and the extent of challenges which must be overcome. Leitrim must play an integral part of the future of this region and in turn, this country as we continue in our economic recovery. Rural counties such as Leitrim must become more resilient to the cyclical boom and bust cycles and unlock the unrivalled potential of our regions. The National Planning Framework must provide the basis for achieving this vision.

Leitrim County Council remains fully committed to the detailed collaborative submission by the Northern and Western Regional Assembly which was submitted at pre draft stage and to the more recent submission submitted as part of this consultation phase of the process.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'J. Gilhooly', is written over a horizontal line.

Mr. Joseph Gilhooly,
Chief Executive (Temporary),
Leitrim County Council

