

NPF Submissions,  
Forward Planning Section,  
Department of Housing, Planning,  
Community and Local Government,  
Custom House,  
Dublin D01 W6X0

A chara,

The Rural Independent Group would like to submit the following brief comments on the National Planning Framework.

We do so having pursued this issue through various parliamentary facilities and having campaigned on the need to broaden the scope of the NPF's predecessor, the National Spatial Strategy.

We welcome the fact that The National Planning Framework will act as the strategic planning context for relevant Government policies and investment in housing, water services, transport, communications, energy, health and education infrastructure.

We do note however that the process is set to involve preparation by the three new Regional Assemblies of their new regional spatial and economic strategies, and for planning authorities and An Bord Pleanála.

These Regional Authorities, which emerged as part of the Government's reform of local government as set out in Putting People First- Action Programme for Effective Local Government and the Local Government Reform Act 2014 provided for the existing 8 regional authorities and 2 regional assemblies to be replaced by 3 new regional assemblies.

With respect to our own electoral area this relates to The Southern Regional Assembly which has 27 members and covers the county councils of Carlow, Clare, Cork, Kerry, Kilkenny, Tipperary and Wexford, the city council of Cork, and the city and county councils of Limerick and Waterford.

Our views on this matter are tempered by the fact that we have consistently opposed the radical democratic deficit created by the abolition of Town and Borough Councils.

This has undermined the capacity for genuine local input into any future planning process and has transferred it to a more centralised and distant regional format.

While the stated aim of the new assemblies is to co-ordinate, promote or support strategic planning and sustainable development and promote effectiveness in local government and public services, we remain unconvinced that the models of regional representation we are creating are the most effective means to achieve these outcomes.

We would advocate a return to more local forms of representation in terms of strategic planning and sustainable developments. Continuing the move toward further and further centralisation in all aspects of strategy will ultimately be in my view counterproductive.

We want to welcome previous commitment given in December of 2016 that the process for creating the NPF would involve consulting with other Departments and agencies in recognition of the whole-of-Government approach and the challenges and opportunities that exist to better align place making, investment priorities, employment and environmental strategies.

This approach it must be said is characteristically absent from almost all government approaches to rural Ireland that have emerged in the last number of years.

Aspirations are made, commitments are given and yet Departments do not seem to work in cooperation with one another.

For example Deputy Mattie McGrath has suggested to former Minister for Finance, Michael Noonan, that he create an cross-departmental approach to the issue of so called 'vulture fund' activity in rural Ireland. The problems of home finance and the sustainability of farm land and the agri-sector are increasingly and intimately linked. We require coordinated forward planning on this issue.

We also want also to welcome government comments that If we want our country to be the best it can be, we must ensure that development and services are located where all of our people can best be served. In other words, that the right development can take place in the right places, at the right time.

We agree wholeheartedly with this sentiment as it speaks to the urgent need to develop, not diminish local transport infrastructure links. We would qualify that support however if it meant the continuing pursuit of a policy which ignores or makes unsustainable the wishes of our citizens to live and raise their families in rural Ireland.

It is a clear fact that Ireland has one of the highest proportions of people living in rural areas among EU states. Indeed Eurostat figures indicate 42% of Irish people live in rural areas compared to an EU average of 27%.

Any National Planning Framework policy that emerges from this process must take these figures seriously and must not seek to further create through stealth or omission the continuing and unfair dominance of the Dublin region.

As you will know The programme for government commits to delivering 135,000 jobs outside of Dublin by 2020.

The NPF must work to achieve this goal not undermine it.

A revised plan for the rejuvenation of rural Ireland cannot escape or evade this responsibility.

There are a host of other issues that are besetting rural Ireland which the NPF process must take cognisance of; the lack of support to the Post Office Network and the knock on effects of increased social isolation is just one instance.

## Maternity Strategy:

Access to adequate levels of maternal healthcare both pre and post-natal must be delivered as per the National Maternity Strategy.

## Roads:

The current situation with respect to the national roads network is also unsustainable and must be addressed.

The emerging NPF policy must take account of the following:

Government must consider increasing the regional and local roads budget as part of the Capital Investment Plan 2016 - 2021, in the context of the mid-term capital review which is underway;

- ensure that Transport Infrastructure Ireland and local authority funding is examined in the course of the expenditure review, with a view to being progressively resourced to ensure proactive national road project planning to increase the pipeline of essential roads projects, so that sufficient numbers of projects are brought through the planning and design stages and ready for construction as funding becomes available;

- accelerate support for the safety improvement schemes for dangerous junctions and bends, particularly where serious accidents and fatalities have occurred;

- continue funding, to enable the restoration of class 3/cul-de-sac roads;

- ensure continuation of Ceantair Laga Árd-Riachtanais (CLÁR) funding for disadvantaged areas;

- require local authorities to examine speed limits on all regional and local roads, and to ensure the process of adjusting speed limits continues to engage with local communities;

- ensure that local authorities take responsibility for ensuring that drainage, hedge cutting and the removal of overhanging trees are carried out where appropriate, in the interests of road safety, and to reduce damage caused to large vehicles particularly buses, lorries and agricultural machinery;

- urgently address road safety issues involving wild animals, such as deer, in co-operation with local authorities and other public bodies;

- undertake swift implementation of the commitment contained in the Action Plan for Rural Development, to examine the scope for increased investment in regional roads in the context of the review of the Capital Investment Plan 2016 - 2021, which will take place shortly;

- undertake relevant authorities to allow the cutting of hedges, and other vegetation on our roads as and when deemed necessary and not subject such work to be carried out within specified time limits.

## Housing:

Consideration must also be given to the comprehensive delivery of a national house building programme that is not overly complex or liable to create or compound further unnecessary delays.

In particular, any proposed rural housing planning policy based only on 'economic need' alone, with no mention of 'social need' would not be acceptable to us.

Go raibh maith agat,

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