

**Responses Paper to the
Draft National Planning Framework
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**Draft National Planning Framework –
“Ireland 2040 our Plan”.**

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Introduction

This submission is done in the context of my earlier submission that was made as part of the initial element of the public consultation phase following the publication by the government of the “Issues and Choices” paper.

The Draft National Planning Framework (NPF) document regrettably, unlike the previous National Spatial Strategy (NSS) documentation, contained no mapped analysis of stated objectives, but rather, simply focuses on a more “business as usual”, or “unimaginative”, and on a more generic number of (national) policy objectives. In essence, the draft NPF utilises a population projection, and moreover, jobs growth projection up to 2040 provided by the Economic and Social Research Institute (ESRI). The population projection of 5.75 million people living in the State by 2040 is used as a benchmark against which the strategy is set. Cumulatively, this benchmark provides for 1 million additional people, 660,000 additional jobs and more than 0.5 million new homes by 2040.

Therefore, the approach adopted within the draft National Planning Framework (NPF) is reflective of a three tier-dimension to the distribution of population and jobs. The first tier approach focuses on the distribution between the three regions, with a focus of re-distributing away from the Eastern and Midlands region (including Dublin). The second approach focuses on the actual distribution within the regions across settlements, with a definite objective to concentrate on selected settlements, while the third approach or tier focuses on the distribution of development within each settlement. It is argued that the third approach will have a highly detrimental impact on rural areas outside of defined settlements.

Some key observations

Settlement Strategy

The Draft NPF has rejected the option to develop one or more new towns or cities. Rather, the objective is to achieve 66 per cent of total growth in the five cities of Dublin, Cork, Limerick, Waterford and Galway, together with their respective suburbs and a number of large regionally distributed towns and their environs to be identified

through the Regional Spatial and Economic Strategies (RSEs). Essentially this means that the development strategy is based on a four tier hierarchy, which includes: the five cities, towns over 10,000, towns under 10,000 and villages under a 1,500 population. Clearly, this strategic policy objective is seemingly favourable, but could potentially damage rural townlands given that the NPF is aiming to achieve a more compact urban form. It is essential the enforced urbanisation does not become the heart of Irish planning policy.

For instance, objective 18b (page 68) of the draft NPF states:

“In rural areas under urban influence, to facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic need to live in a rural area and relevant siting criteria for rural housing in statutory guidelines and plans”

Such a narrow definition of eligibility based on economic criteria should be amended to ensure “social and cultural needs”. Otherwise, many young people will be excluded, under the new framework, from obtaining planning permission to build a permanent home in rural townlands. This policy shift is highly discriminatory in nature, and therefore, it is strongly argued that this area should be modified to include the aforementioned social and cultural needs aspect.

Rural Ireland

The draft NPF defines “rural” to include towns and villages up to a population of 10,000 people and includes a commitment to use underused land within smaller towns and villages for development. It also proposes to provide serviced sites for “self-build” in villages and towns and includes restrictive policies on one-off housing in rural areas, especially in areas under urban influence. This element of the draft NPF will be a “hammer blow” to rural Ireland and must be altered. Such a policy objective does nothing to support rural communities and would fuel de-population and rural decline. This objective must be amended to ensure that individual once-off rural houses can be permitted, subject to normal planning policy, enshrined in national legislation and in each county development plan. To proceed with a national framework over the next twenty years almost solely based on urban

housebuilding would certainly see large areas of land across rural parts of the country uninhabited. It is argued that any exclusive move towards a serviced site initiative for “self-build” style housing in towns and villages would be completely counter-productive. In fact, due to the high cost of land in villages, the initial cost (i.e. combined site purchase and construction) of a one-off house is usually much less expensive. The centuries only tradition of building a home in rural Ireland should not be abandoned at this juncture vis-a-vis the NPF.

Taking inspiration from the Gaelic monikers (ainm) for different forms of settlement, clearly, there is a direct Irish translation for street village (sráidbhaile), nucleated village (clachan) and dispersed village (baile fearann). The NPF should adopt the approach that the dispersed village offers a sound blueprint for future habitation patterns.

City designation or Gateway hub

The fact that the draft NPF rejects any notion of a city or city region north of a line from Dublin to Galway is most disappointing. Accordingly, one of the major problems associated with the focus on cities contained in the draft National Planning Framework is the absence of such large urban centres north of a line from Dublin to Galway. There is a strong opinion, and I argue a justifiable one, that the northern part of the country is being largely ignored. This is a most disappointing development and one that should be addressed particularly in light of the need to drive development in those regions along the Border, the Atlantic and in the Midlands, to ensure that the NPF delivers for the entire State. It is observed from this policy direction within the draft NPF that counties such as Donegal, Leitrim, Sligo, Mayo, Cavan, Monaghan, Roscommon, Longford and Westmeath (given that the Expert Group and my previous submission proposed to have a Midlands gateway designated with city status has been ignored) will be alienated due to the fact that one of the five cities are not within reasonable proximity. The decision not to include the North West City Region proposal in the draft framework represents a devastating blow to the north-west part of the country. As such, if the plan is to be geographically inclusive then this area must be urgently addressed. Clearly, a key urban economic driver in the Donegal region and designation of the North West City Region through a cross border alignment model is essential to address the legacy issues of under

investment in the region. Otherwise, the region will continue to suffer from high social deprivation, poor connectivity and peripherally.

An Gaeltacht and the Islands

A much stronger emphasis must be afforded to our Gaeltacht regions within the framework to recognise the linguistic, social, historical and cultural significance of these unique areas. These areas are significant and recognised from a European standpoint, therefore must be acknowledged within the context of the framework for their unique appeal to international tourists and investors. This recognition should include a commitment or policy position to ensure the State channels adequate levels of capital and economic investment to these areas.

Brexit

The impact of Brexit on the border region of the country cannot be underestimated. The border area must be identified in the NPF as an area requiring strengthened economic development and capital investment. This will be further discussed later.

The Role of Local Government

Regional Spatial and Economic Strategies (RSESs) will now be prepared by the Regional Assemblies in accordance with the NPF. Arrangements will be put in place to enable the preparation of Metropolitan Area Strategic Plans (MASPS) for the five cities in the form of 12 year planning frameworks crossing administrative boundaries and with statutory underpinning. Notwithstanding this, unfortunately, the vitally important role of local government has largely been ignored in the draft NPF. Against the backdrop of the new framework, it is important to empower and strengthen the system of local government, ensuring it is capable of responding to current and future challenges arising from population growth, increased public expectations and the need to demonstrate performance in a transparent and accountable manner, while aligned to the point of democracy closest to the Citizen. Therefore, it is argued that the area of enhancing and strengthening local government must be addressed in the framework, to allow for the capability of delivering the necessary alliances and action to build up the towns, regions and cities. Local Government is best placed to deliver on the implementation of the final NPF objectives over the 20-year time

frame. The identification of additional resources and powers to the units of local government must be addressed within the framework. In fact, it is argued here that the proper implementation and success of the NPF objectives may well depend on the local government sector and, in particular, the powers available to councillors to hold the executive to account.

The Unique position of County Donegal

The draft NPF document makes no provision for the unique and challenging geographic position of County Donegal. The county has lacked adequate levels of investment and development, and it is hoped that the new framework could specifically ensure historical infrastructural deficits be addressed. For instance, some of the key projects which require and merit inclusion within the context of the framework include:

- The need to recognise and promote strategic transport linkages to and within the northwest is critical in meeting the challenges of addressing historic underinvestment to the region. The development of the (TEN-T routes) A 5 and N2 roadway projects to link Donegal and the north-west region adequately with the capital is crucial. As it stands, the north-west region is the only region in the country without motorway connectivity.
- The Letterkenny Relief Road Project to alleviate the traffic congestion in the county's largest town and improve road access to north and west Donegal. The project is also crucial to the development of the FDI companies in the county.
- The Ballybofey-Stranorlar Bypass project. This remains the last remaining bypass project of any town along the Letterkenny to Galway and Limerick national primary route.
- The need to adequately develop the strategically important N15 and N14 national primary routes in the county, together with the need to continually

develop the N56 national secondary corridor, which is significantly important to south and west Donegal and to Ireland's premier fishing port in Killybegs.

- Donegal Airport, and all other regional airports, should be recognised as a key transportation linkage in attaining the objectives of the framework around the areas of regional development.

- The urgent and full delivery of the National Broadband Plan (NBP) is crucial to all areas of County Donegal. For too long, many parts of the county have remained with a below par or no broadband service provision.

- Despite the unknown full consequences of Brexit, border communities will continue to depend on every arm of the State working in close collaboration with Northern service providers. As such, it is important to have this recognised and reflected in the framework, particularly in areas such as transportation development, health services, educational advancement, employment and skills availability to attract FDIs into the region.

Conclusion

The National Planning Framework is critical to achieving sustainable long-term development on this island over the next quarter century. It is essential that the plan has a complete of government buy-in, provides the necessary budgetary and investment follow-through and is engaged with all tiers of government, including the local government sector. However, it is also essential that the plan does not alienate any part of the country or focus exclusively on cities and large urban settlements. The plan must also be subject to rigorous ongoing review to measure progress, or otherwise, and re-align as needed. Ultimately, the plan will be measured based on effective implementation at the local level, therefore, for the purposes of equity, all parts of the country must share the fruits of all future development. Otherwise the new framework wagers a probable new division in Ireland, something which, given the current climate, cannot or should not be afforded.