

Submission of Senator Paul Daly to the National Planning Framework – Draft Plan

Introduction

I am grateful for the opportunity to submit comments in connection with the recently published National Planning Framework – Draft Plan (NPF). My views on the NPF are well represented in the national Fianna Fáil paper but there are certain issues that I would like to highlight in this separate submission, particularly as regards the potential effects of the proposals in this plan on rural Ireland.

The document and the measures that will follow from its adoption will have profound consequences for all who live in Ireland and to a large extent will shape our lives in the coming decades. While we cannot predict what will happen during these years, we can nevertheless seek to imagine the kind of country that we want to live in and the type of society that we wish to build. Given the significance of the document, it is right that the proposals it contains be examined closely and that where those measures are deficient, they be amended.

The NPF offers a timely opportunity to consider the issues that will affect the people of Ireland in the coming decades and to put in place structures that will ensure balanced and sustainable growth that benefits everyone, irrespective of where they presently live or may wish to live in the future. Current projections suggest that Ireland is set to experience significant population growth in the coming years, which will add additional pressures to the already strained physical and social infrastructure. Proper planning should seek to ensure that both the burdens and the benefits of growth are distributed fairly across the country and that all communities, urban and rural, are fairly treated as we move forward in the 21st Century.

With that in mind, there are areas in the document that are cause for concern, not least as regards plans for the revitalisation and then maintenance of a vibrant rural life in Ireland. In every aspect of their lives, from the goods and services that they produce and the landscapes that they maintain, to the pastimes they pursue, the sports they play and the language that they preserve, people in rural communities contribute enormously to Irish culture and society. While the proposed NPF states that *“(t)he open countryside is and should continue to be a living and lived in landscape”*, in some key areas it directly recommends measures that would profoundly damage the integrity and fabric of rural life, working against the preservation of those communities.

Housing

The proposal contained in Object 18b of the NPF is a particular concern, especially the planned shift to economic criteria for assessing planning applications in rural areas. The wording used in Object 18b, whereby it is proposed that applicants would be required to demonstrate an *“economic need to live in a rural area”* appears to be drawn from the recent ECJ ruling in the *Libert and Others v. Flemish Government and Others* case which dealt with measures adopted by the Flemish government regarding acquisition and development of land. However, it is important to note that the case did not consider any measures currently in place in Ireland nor has the Department yet issued guidance on this matter. The term *“economic need”* is not defined in the NPF, and it is not at all clear what this might mean in practice.

In the absence of a proper analysis or public discussion on the issue, there is a great deal that remains uncertain about the conditions in which applications for single housing should be reviewed and approved. In the circumstances, it seems that the proposal to move to examination of planning applications under an economic rather than a social test is premature and unhelpful. It is my view that it should be discarded or at the very least modified to reflect the current lack of clarity on the issue and to allow for further in-depth analysis before any final decision is reached.

Across the country, including in the Midlands region where I am from, rural communities face a daily struggle to maintain viability in the face of decreasing support from government. There are important social and cultural reasons why people choose to live in rural Ireland and to build their lives, their homes and their families in those areas. They are important not only for the individuals concerned but for Irish society as a whole. Without the continued presence of strong and vibrant rural communities, important links to our identity may be lost, which once gone can never be replaced.

The introduction of planning measures that severely restrict individuals and families from living their lives in their home communities will do nothing to reverse the trend of rural decline in Ireland. Instead, it will exacerbate the situation and is contrary to the stated aims of the NPF, which include encouraging growth in rural Ireland and promoting the welfare and opportunities of local communities in rural areas.

At present, planning applications in rural Ireland are often subject to a social link requirement, which in my view is far from perfect. However, to replace the current system with the proposed 'economic link' test amounts to an unfair penalisation of those who wish to build a life and make their homes in rural communities. The current system helps to maintain a generational link within communities and allows for the transmission of cultural heritage, which is crucial for the maintenance of important elements of Irish identity.

The ECJ ruling on Flemish planning laws does not require EU member states to impose an economic test in connection with single housing nor does it prevent consideration of important national objectives when setting policy. Therefore, NPO 18b should be subject to further review and discussion and ought not to be included, at least in its current form, in the NPF.

Economic and Environmental Costs of Rural Communities

The NPF references the expense associated with providing services to rural areas and the need to structure rural communities in such a way as to make them economically productive. However, the inevitable consequence of this logic is that it would be more economically efficient for all or most citizens to live in large towns and cities and indeed the tone of the document suggests a preference for urban living over rural development.

For instance, in reference to dispersed housing patterns in rural Ireland the document states that *"(t)his type of development has made it costly and often unfeasible for the state to align and invest in infrastructure delivery where it cannot be justified and compounds issues such as congestion and pollution..."* (page 86). It further states that while housing may "still" be located in rural areas this should be *"at the appropriate scale that does not detract from the capacity of our larger towns and cities to deliver homes more sustainably"* (page 86). The message here appears to be that those

wishing to build a future for themselves and their families in rural areas represent an unwelcome hindrance to the state.

The stated purpose of the NPF is to support growth in urban and rural areas, large cities and towns as well as those living in villages and rural townlands. It is not simply a case of prioritising economic considerations, but rather those concerns must be balanced alongside the social and cultural needs of all areas. The document broadly expresses support for rural communities but then in its detailed elements suggests a strong bias in favour of developing urban areas at the expense of encouraging renewal and growth in rural Ireland. These contradictions between aims and measures are counterproductive and should be revised.

Furthermore, the NPF flags the environmental costs of rural communities and the over-reliance on cars. The message seems to be that if we could just move people out of the countryside and into the towns and cities, a properly functioning public transport system would materialise. Given the way that current public transport infrastructure operates in large cities in Ireland, it is not at all clear that it would be wise to rely on this outcome.

In any case, for a document that aims to plan and prepare for the next two decades and beyond, little attention has been given to the potential for new technologies to transform the way we live our lives. It is becoming increasingly clear that technologies including new and better renewable energy infrastructure, electric and even automated vehicles, as well as new models of transportation, such as car sharing, may come on stream in the coming decade or two. These and other developments could potentially alter how we all live our lives, in urban and rural areas.

While I accept that it is difficult to plan for a future where the rate and direction of technological development remains unclear, it seems that little or no effort has been made in the NPF to provide for the possible impacts of new technology over the coming two decades. This is a period that is expected to see rapid technological change. To the extent that those technological developments will diminish or even eliminate some of the purported negative elements associated with rural living, this has not been adequately addressed within the NPF document.

Designation of Athlone as a Regional City

The National Spatial Strategy 2002-2020 (NSS), the predecessor of the NPF, contained many good proposals but due to a lack of proper planning and implementation, its effectiveness was ultimately compromised. However, we can learn from the failings of the previous strategy and, in framing the new document, seek to prevent a repetition of those errors.

For instance, in the NSS it was envisaged that Athlone, Mullingar and Tullamore would act as a linked gateway or hub. Improved integration between the three towns was to lead to better economic, educational, employment and social opportunities for the local population. The hope was that with better planning and investment, this connected Midlands urban hub, together with other designated gateway towns, could lead to a fairer distribution of resources throughout the country and enhanced opportunities for growth in all communities.

Unfortunately, the planned outcomes did not materialise under the NSS and there is no mention of this previous objective in the current proposed NPF. The NPF stresses the need for balanced and fairly distributed growth throughout the country, and lists objectives for both urban and rural

Ireland. Yet, the discussion about urban development is heavily tilted toward the current designated cities, Dublin, Galway, Cork, Limerick and Waterford. Large towns are more or less combined in the category of “others” as if they do not each face their own individual challenges.

It is likely the case that each large town will require its own individual path to sustainable growth which takes account of its unique factors and so broad statements that lump all of these urban centres together are inappropriate and unhelpful. In this regard, it is worth noting that notwithstanding the previous commitment to the Midland regional urban hub under the NSS, the towns of Athlone, Mullingar and Tullamore are not mentioned anywhere in the NPF document, nor do other large and important urban centres in Ireland receive specific appropriate consideration.

It is my view that we cannot hope to have fair and balanced growth, especially within the Eastern and Midland Region, if the NPF does not specifically deal with the influence that Dublin exerts within the region and consider how to counterbalance that city’s dominant position. The previously proposed Midland urban hub strategy did not succeed but there should be a renewed effort to establish a strong and vibrant urban centre in the Midlands to encourage economic and social opportunities in the region and to somewhat offset the gravitational pull of Dublin to the east and Galway to the West. A strong and vibrant city in the Midlands is required in order to offer the opportunities to grow and thrive that the local community deserves.

Therefore, I am firmly of the view that under the NPF, Athlone should be designated a regional city and the required investment and infrastructure to facilitate this aim should be made available. It is clear from the previous failed programme under the NSS that without real and sustained efforts to offer alternatives to the current major cities, regional communities suffer stagnation and decline. The designation of Athlone as a regional city in the Midlands, with concomitant commitments to provide the resources to enable growth, could significantly boost the local community and kick-start a process of renewal and regeneration, while at the same time ensuring a more balanced distribution of growth within the Eastern and Midland Region.

Conclusion

If properly formulated and implemented, the NPF has the capacity to enormously benefit the lives of people in all communities across Ireland. It can lay the groundwork for the continued survival of important elements of Irish identity and culture and put in place the conditions for future generations of Irish people to thrive. But it is important to learn from past mistakes and ensure that the supports needed to make this happen for all sectors of Irish society, rural and urban, are made available.

To the extent that the current NPF document contains measures that work against a strong and vibrant rural Ireland, as highlighted above and in the Fianna Fáil submission referred to earlier, revisions and amendments should be made. It is my view that those changes are necessary to deliver the support of rural Irish communities. Without that support, there is a risk that the NPF will share the fate of its NSS forebear and will fail to deliver on its promise. This is an important opportunity to plan and build an Ireland that works better for all its inhabitants, wherever they come from and wherever they live. It is an opportunity that should not be missed.