

SLIGO

READY TO GROW

CAPACITY TO DELIVER



**Submission on the Draft
National Planning Framework**

by Sligo County Council

9 November 2017

To: Department of Housing, Planning and Local Government

From: Sligo County Council

Date: 9 November 2017

Report: Ireland 2040 – Draft National Planning Framework

1. Introduction

The Draft National Planning Framework 2040 was considered by the elected members of Sligo County Council at a special meeting held on the 31st of October. A summary of the comments arising out of this meeting are set out below:

2. Sligo's Growth Target is Achievable

The Department indicates that the NPF will be a tool to assist in the achievement of more effective regional development. In order to ensure that positive outcomes arising from national growth can be shared by people throughout Ireland, the potential of all areas will need to be realised, relative to their capacity for sustainable development. In this regard, Sligo County Council welcomes the population growth target of 40% included for Sligo and is confident that this growth rate is achievable if the necessary investment is provided for in the upcoming National Investment Plan. Sligo County Council is concerned, however, that the National Investment Plan will not adequately prioritise funding to Sligo without the explicit recognition of Sligo's importance within the North West region in the National Planning Framework.

Furthermore, a large proportion of funding under the Smart Growth Initiative should also be directed to urban regeneration projects in designated large regional towns (like Sligo) without the need to compete with other non-designated urban settlements.

3. Sligo's position in the North-West not recognised

Sligo is the most obvious large regional town that should be supported without reservations by the NPF and the National Investment Plan to achieve its growth potential in terms of employment and population growth, in parallel with infrastructural development and regeneration of the town centre. It is not acceptable that no explicit reference to Sligo's regional significance is made in the Draft Plan.

In contrast, Dundalk is the only former NSS Gateway nominated in the Draft NPF for the purpose of “*developing the critical mass of the Newry-Dundalk area **to compete with other large cities***” (Fig. 7.2 on page 103 in Section 7.3 Working together for economic advantage).

Given that Dundalk is a large town located in the Dublin’s catchment area, it is not clear why it receives explicit support for growth while Sligo, which is outside the catchment area of any city, is not mentioned in a similar context.

4. Promotion of Cross-Border Partnership Not Evident

The importance of promoting cross border collaboration and partnership is now even more critical in the context of Brexit. The NPF must therefore be aligned with the objectives set out in the Regional Development Strategy (RDS) 2035 for Northern Ireland. While the Draft NPF includes reference to the Dublin-Belfast Economic Corridor and the North-West Strategic Growth Partnership, the importance of the central border region is totally disregarded. The RDS 2035 recognises the economic significance of this area in designating Enniskillen as the ‘south-west gateway with strategic links to Sligo’. The RDS 2035 states that ‘*Enniskillen has an inter-regional gateway function being only 1 hour drive from Sligo on the main transport route. There are opportunities for Enniskillen and Sligo to work together to provide services on a cross border basis.*’

The NPF must therefore include appropriate provisions to take advantage of these opportunities for cross-border partnership particularly in addressing the challenges to be posed by Brexit. For example, the upgrade of the N16 should be included as one of the national strategic outcomes in enhancing regional accessibility and to ensure consistency with the RDS 2035 which designates this route as a Key Transport Corridor.

5. SEA preferred option not supported by details

In terms of Strategic Environmental Assessment, Section 10.3 Alternatives to Business as Usual (p. 147) indicates that the preferred option was “Option 2 – Regional Effectiveness and Settlement Diversity”, which is said to “acknowledge the economic importance of Dublin whilst ensuring growth across the regions and in other urban centres”.

It is considered that this option is not fully reflected in the details of the Draft NPF, which fails to identify and quantify urban areas for targeted growth outside Dublin and the other four cities. It also fails to indicate the manner in which future population and housing will be directed into settlements as opposed to the open countryside.

6. Balance vs. competition in regional development

There is no mention of “balanced regional development” anywhere in the Draft NPF. A possible interpretation of this omission would be that the Government is not pursuing this type of regional development.

This interpretation seems to be supported by a statement in Section 9.3 National Investment Plan (p. 130) that *“There is broad consensus that public infrastructure investment is an important aspect of a **competitive location policy**, impacting on an economy’s or region’s cost structure and competitiveness. Research also highlights the scope for public capital investment to influence the regional dispersion of economic activity and influence the rate at which regions accumulate various productive factors, particularly infrastructure”*.

The above statement is not followed by any commitment to “influence the regional dispersion of economic activity” in a manner that would reduce the regional imbalance in the country.

7. Lack of commitment for investment outside Dublin

“Investment” is a term that appears frequently in the Draft NPF, not necessarily in the context of funding projects. At the same time, there is no commitment to investing in large towns outside city catchment areas.

In Chapter 9 Implementation, there is no clear indication regarding the manner in which “national strategic outcomes” will be achieved. Furthermore, it appears that the burden of implementation will fall disproportionately on the Regional Assemblies.

The bid-based funding under the Smart Growth Urban and Rural Initiatives will be both uncertain and insufficient to achieve visible progress in enhancing quality of life.

The requirement to participate in competitive bids for “seed funding” under the Smart Growth Urban Initiative will have substantial costs and potentially no benefits for cash-poor local authorities such as Sligo County Council, which cannot compete with the five cities or with financially better-off local authorities in the Dublin Metropolitan Area.

8. Comments on specific details

➔ Statement on page 33

*In setting targets for future growth, it is a **pattern of development that is being targeted, rather than precise numbers**. At a national level, location, relative scale and proportionality are more important than a numeric allocation of projected future growth. Targeted numbers will assist in monitoring and assessing performance and will provide an indication of the pace and scale of development.*

The targeted approach is recursive, which means that it can be applied repeatedly. This also means that it is fair and allows for local aspiration and ambition. The approach enables flexibility at the regional and local levels of the planning hierarchy and for subsequent evaluation and review.

Does this mean that the targets are non-statutory? In a statutory document? Too much flexibility undermines capacity to achieve consistency across Regional Strategies!

➔ **National Policy Objective 2b (p. 37)**

At least half (50%) of future population and jobs growth will be focused in the five Cities and their immediately adjoining suburbs with a target of around two-thirds (66%) to be focused in the cities and their suburbs together with a number of large regionally distributed towns and their environs to be identified through the Regional Spatial and Economic Strategy (RSES) process.

This would mean 500,000 additional persons in the five cities with an additional 160,000 in the large regionally distributed towns.

An additional 500,000 persons in the five cities would increase the population from 1.6 million in 2016 to 2.1 million in 2040. The NPF sets a population growth target for small towns and rural areas at 15% (Page 65). This would equate to an increase of 360,000 persons thereby increasing the population in these areas to 2.76 million. This would leave just 140,000 persons to be allocated to the larger towns.

The NPF indicates that the 2040 national population will be 5.75 million. If 2.1 million is located in the five cities and 2.76 in rural areas, then that remainder of 890,000 will be in the larger towns. This would be a growth of just 122,000 persons in the larger towns from the 2016 figure of 768,000.

These discrepancies in the projected population growth in larger towns from 122,000 up to 160,000 would suggest that the NPF targets a population growth somewhere between 16% and 21% for the larger towns. However, Section 3.6 of the Draft NPF targets growth rates for larger towns of between 20% and 40%

Clarification is needed.

➔ **National Policy Objective 3c (p. 39)**

In areas other than the five City and suburban areas of Dublin, Cork, Limerick, Galway and Waterford, at least 30% of all new homes would be delivered within the built-up envelope of existing urban settlements.

How exactly is this going to happen? How can local authorities ensure that house building will take place in urban settlements and not predominantly in rural areas (as is the case at present)?

➔ **National Policy Objective 9b (p. 50)**

Regional and Local Authorities will identify and quantify locations for employment growth, where suitable, in urban areas generally.

This is not sufficient for employment growth. How will new jobs be created in the absence of committed investment to provide access and other infrastructure to the identified locations?

➔ National Policy Objective 10 (p. 51)

There will be a presumption in favour of development that encourages more people, jobs and activity within existing urban areas, subject to development meeting appropriate planning standards and achieving targeted growth.

What exactly does “presumption in favour of development...” mean? Planning decisions are expected to be made on an objective basis. Clarification is needed.

➔ National Policy Objective 11 (p. 51)

In urban areas, planning and related standards, including in particular building height and car parking will be based on performance criteria enabling alternative solutions that seek to achieve well-designed high quality and safe outcomes in order to achieve targeted growth and that protect the environment.

What are “performance based criteria”? Will these criteria be defined in future legislation or guidelines?

➔ National Policy Objectives 17a and b (p. 67)

Support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.

Develop a programme for ‘new homes in small towns and villages’ with local authorities, public infrastructure agencies such as Irish Water and local communities, to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages. This will initially be developed through pilot ‘service sites schemes’ in order to provide suitable quality housing solutions to meet the needs of people who might otherwise seek to reside in dispersed housing.

Who will provide the interventions, amenities and services? Who will acquire sites? What will be the source of funding? A future “Serviced Sites Scheme”? Who will be the lead partner in the development of the programme?

➔ National Policy Objective 18a (p. 68)

Ensure, in providing for the development of rural housing that a distinction is made between areas under urban influence i.e. areas within the five city regions and the hinterland of towns, and elsewhere and that the standardised EU/OECD definition of a city region shall be applied to identify the urban influence of cities and large towns (>10,000), with influence of smaller (>10,000) towns determined locally.

The areas corresponding to the EU/OECD definition (15% workforce commuter catchment areas) should be supplied to local authorities by the Department or the CSO, because neither the map nor the data is available on the CSO website.

What will be the criteria for determining the areas under the influence of small towns?

➔ National Policy Objective 18b (p. 68)

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.

What is the definition of “demonstrable economic need”? Does this relate exclusively to employment in the rural locality? Or the lower cost of building a house on family-owned land compared to buying a site or house in a town or village?

What about demonstrable social need? (e.g. providing care to relatives or other rural residents)

➔ **National Policy Objective 19 (p. 68)**

Project need for single housing in the countryside through the local Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.

What is the justification for this NPO?

The utility of such projections is doubtful, given that the number of permitted houses cannot be capped and new residences have to be permitted if in accordance with development plan policies.

At present, it is not possible for local authorities to quantify or forecast rural housing need based on available data.

The HNDA methodology must be provided by the Department.

➔ **National Policy Objective 29 (p. 80)**

Local planning, housing, transport/accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

Does this mean that future Core Strategies must include specific projections of particular age cohorts, such as over-65s? Should these projections be prepared at County level and/or town level?

Clarification is necessary, including the source of funding for “clear proposals in respect of ageing communities”.

➔ **National Policy Objective 64 (p. 127)**

Provision will be made for urban area plans for larger towns and their environs with a population of more than 15,000 people. Provision will also be made for joint urban area plans and joint local area plans where a town and environs lies within the combined functional area of more than one local authority.

Will there be a different process/procedure for Urban Area Plans or will it be the same as for Local Area Plans? Perhaps more time for public consultation than the LAP procedure allows?

There is a concern that a legislative requirement to prepare an Urban Area Plan would necessitate the replacement of a recently adopted LAP. Such a scenario would appear to be unnecessarily onerous, particularly given that the Urban Area Plan would appear to be consistent with the content and process involved in an LAP.

It is suggested that any requirement to make an Urban Area Plan should not apply to any area for which:

- a) A Local Area Plan has been adopted within the previous 4 years, or
- b) Pre-draft consultation has already commenced for the preparation of a new LAP.

9. Correction necessary

The “Case Study” on p. 130 contains an incorrect statement regarding €2 million that “has been spent on street enhancements to O’Connell Street” and on the “provision of a new community centre for Cranmore”.

While funding has indeed been obtained, the works have not yet been carried out.

10. Conclusion

The National Planning Framework should set a vision and strategic framework for achieving sustainable and effective regional development in Ireland. Within this policy framework, Sligo should be identified as an urban centre to be developed in an accelerated manner to drive and sustain regional and rural development in the North-West region. It is not appropriate for the national policy document to delegate the identification of the regional growth centres to the Regional Spatial and Economic Strategies.

Furthermore, Sligo County Council is concerned that the National Investment Plan will not adequately prioritise funding to Sligo without the explicit recognition of Sligo’s importance within the North West region in the National Planning Framework.



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