



Leas-Cheann Comhairle
Pat the Cope Gallagher TD

**Submission on National Planning Framework
draft plan – Ireland 2040 our plan.**

By

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Overview to draft plan as published

Firstly, I welcome this opportunity to make a submission to the draft plan on National Planning Framework and ideally the plan when implemented, will become the blueprint for balanced regional and national development in the years ahead. Unfortunately I have grave and serious reservations as to the consequences for rural Ireland and the communities of the West and Northwest of this country, should this draft plan ever become a reality.

The plan lacks any understanding of rural life, of the present plight of rural communities after the past 8 years of most serious decline, perhaps more damning than anything is put simply - this draft plan was not rural proofed before it was published by the Government. The draft plan is completely focussed on urban and larger town centres over rural areas, it further wishes to strengthen and create larger centres of population at the expense of the rural countryside, the tiered or hierarchy of plans approach will destroy any potential of rural revival as contained in the draft plan, as it is the clear and stated policy to prioritise urban over rural.

Over the next twenty years Ireland will experience unprecedented growth and with such growth as predicted it presents both opportunity and challenge as to how we handle such growth. If this draft plan is adopted without change we will destroy any potential of recovery for rural Ireland, this plan as presented is most Cromwellian in its approach to rural Ireland and will have the same desired effects of the policy espoused by Mr Cromwell for the west of Ireland.

Proper long term planning and balanced regional growth are the cornerstone for a sustainable future for the entire country but failing to provide an equal opportunity for the lesser developed rural communities or areas which have sustained more decline than others will not create the potential which could be achieved if the plan was favourable to all areas rather than just be an urban orientated plan. The national planning framework must not be simply the national urban strategy by prioritising more regional imbalance and even further rural decline, which we have experienced since 2010 in this country, the plan if it desires to succeed needs to be proactive for rural Ireland.

This plan in its draft format, mentions less about rural Ireland than any previously published Government strategy and that is the issue facing us in terms of having any buy in by rural Ireland and rural communities in this draft published strategy.

Draft plan proposals and areas which require to be reviewed.

- **National Policy objectives 18 b, 18a and 19 and the draft plans objectives for housing in open countryside.**

There is a total absence of understanding for the need for one off housing in rural areas; the draft plan covertly is proposing a seismic change in how we as a state treat the right of our citizens to obtain the right to build a house for themselves on his or her own lands in our rural communities or rural countryside. There is a failure to strengthen the historical right to build in rural areas – now we propose to look at economic need to live in rural areas; this if left unchanged will cause a complete havoc for future generations in rural areas. Similarly, if we within our rural counties allow for a hierarchy or tiered approach we could potentially have an urban and rural divide within our counties as well as within our wider state which we have at present. The strategy must from the outset recognise the unique right in Ireland as opposed to many other European countries to build in rural areas as a right. The plan fails to establish an equilibrium between rural housing need and the right of the individual to build in a rural area and the further development of urban areas which is ongoing at a rapid rate currently compared to rural areas, the plan continues to overly focus on urban areas, as in some way that urban areas solve the rural housing problems – it is the urban boom that undermines and curtails rural growth because of the gapping imbalance which exists in this country at present.

- The National Planning Framework must give parity of entitlement and equal rights to rural housing policy applicants, as it is clear that urban dwellers and urban zone applicants are been actively favoured in this plan, the current plan is an anathema to the rights of rural housing applicants and I believe that the Government and Department are overly focusing on the outcome of the recent European Court findings on the Flemish case on housing residency rights. It is evident that a sizeable change of policy direction is occurring in the Irish Government's thinking towards rural housing policy; unfortunately this is not properly thought out and will have dire consequences for our already struggling rural communities. Historically Ireland has had a great tradition of rural dwellings with strong and vibrant rural communities, this plan needs to put in place a strategy that underpins our historical past and furthermore put in place a plan to revitalise our rural communities rather than as proposed further undermine their vibrancy
- The rural housing policy in the final plan needs to be proactive towards the rights of citizens to build in rural areas – it needs to clear in its stated intent and as a right, the residents of rural areas should be able to build in his or her area, providing they keep within the design guide, environmental factors and siting regulations as adopted by the local authority, this must be further underpinned within each County Development plan rather than what is being proposed. The proposed wording of the draft plan will be a recipe for each planning department in our local authorities, to cast doubt or possibly put in place a rural housing policy, which will make it very difficult for applicants to obtain planning in rural areas. Rural housing policy must be focussed on giving equal rights to rural applicants to reside in the place of their birth; it must also give the right to other applicants to obtain the right to live in rural areas permanently should that be their wish.

- The draft plan lacks ambition for rural development in terms of employment creation, job diversity, sustaining industries unique to particular areas and the greater spread of a more balanced economic development of the regions – rather than being innovative and creative, the current draft plan reverts to larger towns, cities and economic zones only. I have to ask the question how can this strategy be called national when in economic terms its deal with around 15 % of the land mass of the Republic – the other 85% is located outside of the towns and cities mention or the proposed zones. It fails to set targets for employment creation in rural areas, it fails to maximise the potential of the natural resources of our rural communities, there is an urgent need to put in place a policy which will be a catalyst for change in rural areas.
- The draft plan needs to deal with the very many planning delays which occur in our planning system, whilst the actual planning application process is time restricted and clearly defined from the outset – the same cannot be said regarding subsequent planning appeals, which was clearly the case as recently witnessed in Galway but the same can be said in regards of many other cases right throughout the country. It will be necessary that the NFP define a streamlined system of appeals which would be time restricted, so that a decision can be given in a time friendly fashion and this would apply to appeals to An Bord Pleanala, the High court and Supreme court if the needs arises. For the Government to implement a national framework plan, we need to once and for all, deal with the farce of planning delays which occur all too regularly in this country. It could be said that in fact it is possibly causing reputation damage to our country at present. Everyone has a right to object and appeal but it is the duty of Government to insure these processes do not drag on and that an orderly structure is put in place to deal with these appeals so that they are not allowed to drag on open ended for all time. This plan needs to be proactive in dealing with this issue in order to provide the confidence which is needed, that Ireland is a proactive and pro-business society to carry out business in.

- It is clear from the evidence in this draft plan, that other key Departments of Government are not fully taking a proactive role in this plan. For this plan to work and succeed, it will require all departments to work together if this is to become a genuine framework strategy for 2040 – there would be greater emphasis on interlinking the Capital infrastructure plan with the future growth projections and strategies of this country. Case in points being the A5/N2, the proposed N4 motorway to Sligo and the further development of the Atlantic Corridor towards the Northwest- Sligo and Donegal. This plan lacks joined up thinking, it is not a single plan but a combination of ambitions, lacking a central focus and single emphasis of strategy. Infrastructural investment will be the fuel which will ignite regional growth and be the ultimate trigger for growth in our less well of areas. The plan fails to convince, that the strategy is either joined up in thinking or acting in unison as a strategy in that regard.
- The draft plans needs to strengthen its position on regional airports, particularly in terms of Airports which serve regions that do not have access to rail or motorways such as the Northwest. The plan needs to explore the possibility of ancillary business for these airports – such as service sector for exploration off shore, the possibility of economic zones around regional airports in conjunction with other state agencies responsible for employment and job creation.
- The NFP needs to put in place a more comprehensive plan and strategy for our Island communities, the plan lack specifics for the future strategies for our islands.
- The national framework must work hand in glove with the future infrastructural development of the regions – if this draft plan is to succeed in sustaining and building the regions, then a full review of these sections dealing specifically with infrastructure needs to take place. There is a clear link between infrastructural investment and

future regional growth which this plan fails to demonstrate is bona fides in this regard – such as a timeline for the A5/N2 completion so that, in that context, a more comprehensive regional strategy can be dovetailed with its completion.

- The draft plan fails to recognise the added value potential of the Marine sector, I propose that a section incorporating the fisheries centres and harbours devoted to Fisheries be drawn up and I draw your attention to the recent developments in Killybegs such as the added value potential of Boar fish. An economic and employment creation zone needs to be created around each harbour centre and fisheries port for future development of these harbours and potential to allow future added value of the sector. Many recent proposals around our Harbours had been appealed to An Bord Pleanála due to zoning issues, as a nation we need to work on the model of other European countries whereby in proximity to well established industries or resources, such developments must be permitted as a right, providing they satisfy environmental issues but it is not a requirement to satisfy locational issues due to the proximity to an established Port or Harbour. Our planning rules and regulations must give the rights to others to express their views and object but it has to be within reason and appreciating the overall context of the surrounding and land uses.
- The current draft plan is shocking in its approach to Gaeltacht areas and their respective status within our country. The draft plan as published only devotes 80 words to a Gaeltacht strategy – it neither has ambition nor intent, due to the brevity of inclusion in this framework. This is further proof that this plan lacks an overall pro rural development strategy. No specific mention is given to any of the state agencies dealing with the Gaeltacht areas, nor is there any reference to the unique potential which can be harnessed from the Gaeltacht areas in terms of cultural tourism. The Gaeltacht areas of this country offer huge potential for future growth but the draft national framework plan fails to adequately recognise the Gaeltacht areas, never mind offer any potential for future growth. I propose that the entire strategy for

Gaeltacht areas be rewritten and a genuine effort be made to put in place a Gaeltacht strategy for this country. It is further proof that this plan lacks ambition for rural areas.

- The draft plan ignores completely the regional disparities which currently exist in our country – failure for a plan to accurately establish its starting point with only result in complete failure. The national framework plan must be honest from the outset and appropriately account for the level of rural decline which currently exists in our regions.
- Greater emphasis needs to be placed on redeveloping sites or brown field sites – if we are genuine about redeveloping areas of neglect, then incentives need to be put in place for renewal of derelict sites, be they in rural or urban areas, this needs to be given greater emphasis in this draft plan.
- The draft plan must not alone promote and foster economic growth for the country but equally so it must foster growth potential for the regions – this NPF lacks clarity on how such fostering can be achieved in the regions and especially in the Northwest.
- To develop regional growth centres effectively the focus must be placed on supporting education and research in that respective area – in that regard, the plan must be prioritise within those regions - the Institutes of technologies. Those regions must be awarded a Technological Universities, the IT's must be upgraded in status in order to act as an active agent for growth and change in those areas. In that regard , I propose that Letterkenny Institute of Technology be upgraded in partnership with others to a full Technological University status and be appropriately funded in order to the catalyst for growth and development of the entire northwest region in the strategy towards 2040. If we fail to prioritise education and research in these designated areas then we fail to plan for the future and fail to maximise our potential – which must be the driving force in the NFP.

- I welcome the All Ireland approach of this plan but more needs to be done especially in the context of the looming Brexit situation and the implications for the border counties. Appreciating that so much is unknown about the eventual outcome of the Brexit talks but the reality is that things will not be the same between this island and our nearest neighbour in terms of trade.
- Social Housing demand is not alone an urban problem albeit everything is relative therefore more critical mass exists in urban areas – more emphasis needs to be placed on providing housing demand in rural counties, a situation can very easily arise where rural areas can be left behind when complete emphasis is placed on urban areas only – this must be avoided. The best delivery vehicle for social housing in rural areas is the local authorities; therefore it will be necessary for this plan to recognise the unique and important role local authorities play in delivering social housing to the regions and the rural areas in particular.
- The future health strategy as identified in the NFP is disconnected from the reality of our current situation in our health services as experienced by our citizens on a daily basis; again we need to be honest and frank in regards to our current position. I am concerned regarding the wording concerning Community Hospitals on pages 141 “the replacement and upgrade of 90 Community Nursing units including Community hospital “. There is an ongoing failure by this Government to recognise the central role Community Hospitals play in our health service. Similarly the chapter on acute hospitals and the urgent need for additional capacity in all our hospitals is short on detail and even less on ambition for this country. The framework must not fail in providing the social infrastructure which is as equally necessary in providing our whole and complete communities, this I feel is light on detail and requires greater emphasis before this draft is adopted as a full and complete strategy. The provision of health care in our communities be that primary, acute or community care must be foremost in formulating a comprehensive strategy for our communities.

- The enablers of growth need to be front and centre in this plan moving forward, such as the provision of high speed broadband, this draft plan again fails to deal adequately with the need for rural broadband provision in rural areas. The necessity of broadband nowadays is equal to the need for electricity in the 1930's, therefore failing to deliver on broadband is in essence failing to provide the toolkit for areas to prosper and develop in the years ahead.
- Renewable energy and the greater need to do more sources of energy in this country – the NFP fails to identify how it will assist and facilitate greater emphasis on renewable energy, we are a country which has an abundance of choices of how we can develop other sources of renewables but again we fail to deliver a comprehensive strategy for delivery of same. Renewable energy can provide economic opportunity for rural communities if the circumstance for provision and delivery are correct – the draft plan lacks ambition for our future potential in this regard.

Plans are only paper, binded together and glossed over in colour unless there is an implementation goal, an assessment of delivery on an ongoing basis and continuous monitoring of the strategy in terms of its stated aims. This plan as presented is not fit for purpose in terms of rural policy and reversing the current difficulties in our rural counties and addressing the future needs of our rural communities. Our rural communities have experienced the most difficult of times over the past 7 years, this plan must be the plan that enables their revival and renewal but as presently drafted it will fail to do that.

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