



COMHAIRLE | CLARE  
CONTAE AN CHLÁIR | COUNTY COUNCIL

10<sup>th</sup> November 2017

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

### Ireland 2040 Our Plan: Draft National Planning Framework

A Chara,

Clare County Council welcomes this opportunity to comment on the Draft National Planning Framework. Clare County Council fully supports the preparation of a strong, holistic and evidence-based national planning strategy that will ensure the long-term prosperity and sustainable development of the country as a whole.

The Draft National Planning Framework (NPF) sets out the key principles that will guide future development across the country, addressing issues such as making stronger urban places, planning for diverse rural places, creating strong and vibrant communities and ensuring a healthy, liveable environment. While it is recognised that the NPF is intended to be a high-level document, having reviewed the Draft Framework in consultation with our Elected Members, Clare County Council is concerned that a number of issues of national and regional importance have not been addressed in the document and that it fails to recognise and reflect the full potential of County Clare and the mid-west region. Furthermore, a number of the proposals put forward in the Draft NPF are ambiguous and may have a negative impact on the social and economic sustainability of rural areas across the country.

#### Regional Collaboration

Clare County Council is concerned that the ethos of strong inter-regional collaboration is not promoted to a sufficient extent in the Draft NPF. Being located on the border of the Southern Region and the Northern and Western Region, in particular Limerick and Galway, the importance of interaction and collaboration between regions in the achievement of balanced regional growth is critical. Cooperation is particularly important in the progression of inter-regional infrastructure projects e.g. the Limerick Northern Distributor Road and the management of issues such as environmental protection and monitoring, which often transcend geographic boundaries. Collaboration between Counties Limerick, Clare and Galway has been particularly important in the progression of the mid-west economic corridor and continued collaboration between regions should be strongly supported in the National Planning Framework in order to facilitate future growth and development.

Forbairt Eacnamaíochta  
Áras Contae an Chláir, Bothar Nua, Inis, Co. an Chláir

Economic Development  
Áras Contae an Chláir, New Road, Ennis, Co. Clare

☎: 065 6846232 F : 065 6892071 ✉: [planoff@clarecoco.ie](mailto:planoff@clarecoco.ie) 🌐: [www.clarecoco.ie](http://www.clarecoco.ie)

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### Growth and Development of Limerick City

Limerick City, Shannon Town, Shannon International Airport and the rest of County Clare are strongly linked and the future growth and prosperity of Limerick will also have a beneficial effect on County Clare. While the implementation of Limerick 2030 is supported in the Draft NPF, Clare County Council was disappointed to note that no enhanced vision for the future of Limerick has been put forward and the proposals set out for the future growth of Limerick City seem to be significantly less ambitious than those put forward for other cities. Clare County Council is concerned that the potential for future growth in Limerick City is not properly represented in the current draft. Most significantly, some of the key future growth enablers for Limerick have not been mentioned in the Draft NPF.

The Limerick Northern Distributor Road (LNDR) is a key project for the future economic growth of Limerick City and the surrounding hinterland. It will provide direct connectivity between University of Limerick – Clare Campus and the international businesses located in Shannon, which is highly important in the drive to attract international investment to the area. It will create a direct and convenient link between the University, the north side of Limerick City and Shannon International Airport. This connectivity is also highly important to the wider region from an educational, social and economic perspective. Moreover, the route has been subject to Strategic Environmental Assessment and Appropriate Assessment and is included in the County Development Plans of both Limerick and County Clare. Failure to include the Limerick Northern Distributor Road as a key enabler to future growth in Limerick is a serious omission.

Also related to enablers of future growth, the University of Limerick – Clare Campus, the significant lands included in the University Zone and the Errina Canal, which forms a navigable link from Limerick City to the River Shannon and onwards to Northern Ireland, are valuable assets to both the region and the country. The potential for growth in economic, social and amenity terms is vast. The identification and development of this area as a Strategic Development Zone (SDZ) would make a significant contribution to the future growth of Limerick and the achievement of the 220,000 jobs that are envisioned for the Southern Region during the lifetime of the National Planning Framework. Clare County Council requests that the identification of this area as an SDZ be included in the finalised Ireland 2040 document.

### Shannon Town and Shannon International Airport

Having considered the Draft NPF, Clare County Council is concerned that the importance of Shannon Town and Shannon International Airport is not given due recognition in the document. While it is recognised that there are no detailed references to settlements outside of the five main cities in the Draft NPF, Shannon should be an exception given the unique role that it plays as a centre for economic growth and employment in the mid-west of Ireland. It is a centre of international business and is strongly linked to Limerick City. The emerging aviation cluster and the potential for Shannon to develop as a national aviation services centre are hugely important at both a national and regional level and this should be reflected in the National Planning Framework.

The potential of Shannon International Airport is also underrepresented in the Draft NPF. In terms of high quality international connectivity, the Draft NPF focuses on the potential expansion of Dublin Airport, which will require significant future investment. It should be recognised that Shannon

International Airport has the infrastructure and facilities in place to accommodate up to four million passengers annually. The National Planning Framework should recognise the importance of Shannon International Airport to ensuring high quality international connectivity to the west of Ireland and its potential for future growth and development.

It is also noted that Shannon Development is mentioned on numerous occasions in the Draft NPF. Shannon Development was dissolved in November 2014 and there should be no reference to this company in the Ireland 2040 document.

#### The Shannon Estuary

The Draft NPF gives prominence to issues relating to economic development and job creation around the country. It is submitted that the Shannon Estuary, as one of Ireland's foremost natural resources, with unrivalled potential for development and job creation on the western seaboard, is not given due recognition in the Draft NPF. Clare County Council proactively led the development of the Strategic Integrated Framework Plan for the Shannon Estuary (SIFP) and the Department of Housing, Planning, Community and Local Government were directly involved in its preparation and indeed continue to play an active role in the steering committee for the project and in the implementation and promotion of the plan.

While the SIFP is discussed as a case study in the Draft NPF, it is not mentioned in the context of development and job creation and, most crucially, the zoning of significant tracts of land for Marine-Related Industry has not been mentioned in the document. Moreover, the absence of reference to Moneypoint in the case study should be rectified in the finalised document. Given the national importance of the estuary, its potential to attract multi-national development and the significant work that has been undertaken to progress its promotion and development, it is essential that it is given due recognition and support in the National Planning Framework.

The case study relating to the SIFP is also placed at an inappropriate location in the Draft NPF. As the SIFP is the first inter-jurisdictional land and marine based framework plan in Ireland and will guide the future development of the Shannon Estuary, the case study should be directly linked to Section 6.1 Integrated Land and Maritime Planning. It is an example of how we can integrate land and marine planning and, through a multi-agency approach, develop the marine environment in a sustainable and planned manner. Further emphasis should also be placed on utilising this approach in other areas across Ireland. Links to the website where the entire SIFP can be downloaded should also be provided ([www.shannonestuary.ie](http://www.shannonestuary.ie)).

#### Marine Spatial Planning

The preparation of the National Planning Framework presents a unique opportunity to plan for both marine and terrestrial areas in a coordinated manner. However, marine spatial planning appears to be significantly underrepresented in the Draft NPF. Given the potential for growth in the marine economy and the importance of both marine spatial planning and the interactions between marine and terrestrial areas, it is submitted that these issues should be given greater prominence in the National Planning Framework.

In relation to the growth and development of the maritime economy, it is requested the National Policy Objective 41 be further strengthened to provide greater support and assistance to coastal

communities and islands. These are areas where sustainable maritime communities can thrive but they are often restricted by delays in licencing, permitting and other approvals. It is highly important that this objective is made more prescriptive to allow local communities and enterprise to avail of supports that may be available in the future.

It is further submitted that the term 'managed' is contradictory in the context of National Policy Objective 43a as to manage the coastal resource would suggest some sort of interference. If the ethos of the objective is to conserve the natural resource then the objective should indicate this e.g. *"Ensure that Ireland's coastal resource is ~~managed~~ conserved* or other similar focus.

Section 6.5 of the Draft NPF addresses the issue of Offshore Renewable Energy. This section focuses on the potential which may arise in this sector up to 2040 predominately through the realisation of the OREDP. While it focuses on the advances in technology and the requirement for additional or upgrading of infrastructure it does not provide any guidance or support specifically relating to the current limitations and implications with securing a foreshore licence. This can significantly lengthen a project, deter the sector from investing in Ireland and ultimately lead to the non-investment in the marine renewable sector. An objective which seeks to progress the Marine Area and Foreshore Bill should be explored prior to completing the final version of the Plan.

#### Economic Development and Job Creation

Clare County Council is concerned about the potential impact of National Policy Objective 9a, which appears to direct all strategic employment growth to the five main cities, whilst it suggests that all other (non-strategic) employment will be located elsewhere. Clare County Council recognises the importance of creating the critical mass necessary to attract new investment to an area. However, areas outside of the main cities, such as the significant industrial and employment centre of Shannon and rural areas adjacent to key resources such as the lands adjoining the Shannon Estuary, have been the focus of large-scale investment in recent years and are ideally suited to accommodate strategic employment growth. Solely identifying the five cities as the future location for strategic employment growth will greatly restrict other key locations from reaching their potential.

Furthermore, if there is true commitment to the promotion of economic development and job creation, then investment in waste water treatment facilities needs to be emphasised in the plan. Infrastructure investment is essential to ensure growth in settlements across the country and is particularly important in order to support job creation in more rural areas. Decline in many rural areas is directly linked to distance from sources of viable employment. In order to reverse this trend it is essential that job opportunities are created in more rural and peripheral locations around the country. In order for this to take place in a sustainable manner, advanced investment in the necessary infrastructure is essential.

#### Population Targets

Clare County Council has considered the population targets that are set out for each region in the Draft NPF and is disappointed to note that the targets are not as ambitious as anticipated. When the stated growth targets for cities and large towns are taken into consideration, the extent of population increase that remains for small settlements and rural areas is disproportionately low and is likely to worsen the decline of rural areas rather than contribute to regeneration.

Population allocation of the Southern Region	375,000 (maximum growth figure)
3 Cities (Cork 115,000) (Limerick 52,000) (Waterford 29,000)	196,000 (allocated growth figures)
Large Towns	60,000 (16% of overall allocation)
Remaining population for small towns below 10,000 and rural areas	119,000
Distributed between 9 counties in the Southern Region (allocation to be decided by the RSES)	13,222 Per county (between 2018 and 2040)
Average growth in population per year over 22 year period	601 People per annum
At an occupancy rate of 2.5 as proposed in the Draft NPF	240 per annum Houses for small towns below 10,000 and rural areas

Based on the figures set out in the Draft NPF, only 240 houses per annum will be progressed in towns <10,000 and the rural parts of County Clare. It is respectfully submitted that this figure is unrealistically low and needs to be reassessed.

#### Defining Cities, Large Towns, Small Towns, Villages and Open Countryside

It is noted that the infographics set out on pages 44 and 45 of the Draft NDP refer to:

- Cities as 50,000+
- Large towns as 10,000 – 50,000 with *“more than half of the 41 large towns located within the Dublin or Cork City Regions”*
- Smaller towns and villages as <10,000
- Settlements of less than 1,500 people

It is also noted that within the Draft NPF (page 45):

- It is stated that there are 154 smaller towns and villages of less than 10,000 people but “villages” are not defined
- Settlements of less than 1,500 people are mentioned but no lower limit on the population of these settlements is given.
- Small and medium sized towns, with a population of less than 10,000 people, are discussed, but no definition of “medium” is given nor is a lower limit of population provided.

The text of the Draft NPF also refers to *Large Regional Towns* but provides no definition of what constitutes such a town and repeatedly refers to *villages* throughout the text but does not define them.

In order to provide the necessary clarity in the National Planning Framework, it is recommended that the following definitions be adopted and applied consistently:

- Cities: 50,000+
- Large towns: 10,000 – 50,000
- Small towns: 1,500 – 10,000
- Villages: <1,500 but with a minimum “cluster of 50 or more occupied dwellings, with a maximum distance between any dwelling and the building closest to it of 100 metres, and where there is a shop, school etc” (CSO definition). This definition is referred to in Footnote 12 (page 38 of the Draft NPD) but is not used in the text.
- Open countryside: all other areas

This clarity is essential to ensure that the finalised National Planning Framework can be effectively implemented and to guide the proper planning and sustainable development of the country into the future.

#### Defining Urban Areas and Rural Areas

The distinction between urban areas and rural areas is founded on the observations that *“rural areas are distinct and separate to the urban and outer urban areas that exist in our towns and cities and, as a result (rural areas) should not cater for urban or sub-urban style development”* (page 65, emphasis added).

The concept of ‘outer urban areas’ is similar to the concept of ‘rural areas under strong urban pressure’ which is commonly used in County Development Plans. However, unlike ‘metropolitan areas’ which are clearly defined in the Draft NPF, ‘outer urban areas’ are not defined at all. Nor is the size of the town referred to.

It is recommended that the ‘outer urban areas’ of Large Towns (10,000 – 50,000) be defined on the same basis as the catchment areas of cities, namely the contiguous Local Administrative Units (DEDs) from which 15% of their commuting workforce travels to the large urban centres and their environs.

It is further recommended that all Metropolitan Area Catchments and Large Town Catchments be defined as ‘urban’ and all other space be defined as ‘rural’.

#### Planning for Rural Areas

It is submitted that Chapter 4 of the Draft NPF needs to clearly specify how the development of ‘rural areas’ will differ from ‘urban or sub-urban style development’. In order to do this, the economic, demographic, cultural and social features of ‘rurality’ need to be compared and contrasted to those of ‘urbanity’.

It is recommended that a new Section 4.2 ‘Rural Small Towns and Villages’ be added to the finalised version of the National Planning Framework to replace the existing Section 4.4. Within this new section, the important role of Rural Small Towns (1,500 to 10,000) should be noted as:

- The main rural employment centres
- The key public service delivery centres

- The key private service delivery centres
- The essential component in the symbiotic relationship of settlement and hinterland that has the motivational potency to drive action of adequate scale.

It is important that the National Planning Framework highlights that, because of their geographically strategic location, their economic potential, their network of satellite towns and villages and their mutually inter-dependent relationship with their 'open countryside' (hinterland), such small towns need specific planning, investment and development.

Both planning and investment are needed to build their scale and resource complementarities in the areas of:

- Production – small scale technologies, food processing, e-working etc.
- Market town services – retail, professional services, public services etc.
- Agricultural services – marts, agri-supplies, advice, veterinary etc.
- Tourism support services – accommodation, hospitality, information, activities etc.
- Cultural activities – large scale facilities for learning and performing
- Social activities and social services delivery – education, health, transport, social protection etc.

Only with investment and planning can such small towns achieve the scale to act as drivers of their own economic, social and cultural development and that of their more rural hinterland, while at the same time enjoying the benefits of drawing on the wealth of the rural villages and open countryside of their hinterland.

Without such attention for Rural Small Towns within a planning and investment framework, growth in rural areas will be concentrated, as it has been, in the boundaries of Metropolitan Areas and the 'Commuter Catchments of Large Towns and Environs'. In order to achieve the necessary scale, rural small towns need to combine for planning and investment purposes and their combination must be recognised in the National Planning Framework.

#### Housing Development in Settlements and Rural Areas

Clare County Council has serious concerns about the approach taken in relation to settlement development and housing in rural areas. The objectives set out in the Draft NPF are at times contradictory and may be counter-productive in terms of achieving sustainable, compact growth. The objective to ensure that at least 40% of new homes are delivered within the built-up envelope of existing urban settlements is intended to ensure the regeneration of settlements/areas within settlements that have been experiencing population decline, ensuring the viability of local services into the future. However, the Draft NPF fails to recognise the extensive deficiencies in service infrastructure in many rural settlements, which is most acute in more peripheral settlements where services are often at capacity or non-existent. Most of these settlements are not included in the Irish Water Investment Programme and this had already stagnated growth or forced development to the periphery of settlements where larger sites with individual treatment plants can be accommodated. Achieving 40% of new development within the existing built up area of these towns is not a feasible solution to the problems of decline in rural settlements unless significant investment is made in infrastructure.

This will be exasperated by the proposed zoning requirements set out in Appendix 1, most particularly the requirement to reconsider the zoning of lands that are classified as "Tier 3". The Draft NPF fails to recognise that the vast majority of settlements across rural Ireland will fall into this category. In County Clare alone, 55 of the 83 settlements in the county have no public waste water services, nor are they likely to be serviced during the lifetime of the current development plan. It is completely unachievable to meet the county's Core Strategy land zoning requirements if zoning is to be reconsidered in each of these settlements. This will also increase the rate of single houses in the countryside which is contrary to the objective to achieve compact settlements.

Clare County Council also has serious concerns in relation to proposed National Policy Objective 18b which states that, in rural areas under urban influence, the provision of a single house in the countryside will be based on the core consideration of demonstrable economic need (only) to live in the area. The Draft NPF does not recognise the important social factors that are of vital importance in the assessment of such planning applications. Most applications for new houses in rural areas are for persons who have strong attachment to the community from a social perspective, with the applicant wishing to reside close to family members or in the communities in which they grew up. Restricting new houses to those with an economic need undermines many other core objectives of the Draft NPF such as enhancing rural communities and facilitating "aging in place". Clare County Council urges a reconsideration of this objective in the strongest possible terms.

In relation to overall rural decline, Clare County Council does not consider National Policy Objective 15, as set out in the Draft NPF, to be sufficient in terms of addressing this issue. There must be a commitment at national level to analyse the causes of rural decline, which can vary significant from place to place, meaning that a 'one-size-fits-all' approach to this issue will be unsuccessful. If there is true commitment to the regeneration of rural communities, it must begin be progressed from a strong evidence base.

### Green Infrastructure

Having considered the contents of the Draft NPF, and in particular, Chapter 8 Realising our Sustainable Future, Clare County Council considers that the importance of green infrastructure is significantly under-estimated in the document. Green Infrastructure can underpin and support many of the key goals of the NPF such as creating 'liveable' places, enhancing amenities, ensuring a clean environment and promoting active living. It can also be significantly more cost effective than traditional grey infrastructure responses to climate change adaptation and flood management and has additional benefits in terms of creating multi-use spaces and facilities. Green infrastructure is mentioned in isolation in Chapter 8 of the Draft NPF and it is submitted that it should be integrated throughout all aspects of the document and promoted as a priority in the years ahead.

## Social Inclusion

Having reviewed the Draft NPF, it is the view of Clare County Council that the issue of social inclusion and equity in society needs to be given much greater prominence. Every year more and more people become marginalised in society. Homelessness, isolation, discrimination and disadvantage are widespread and ever greater numbers of people are pushed to the fringes of society. National Policy Objective 30 of the Draft NPF deals with the issue of social inclusion. However, this issue should be integrated throughout all aspects of the document. Key issues in the NPF such as enhancing rural communities, accessibility, education and our aging society should not be viewed in isolation; rather they should be progressed in the context of working towards a more inclusive and equitable society. It is the submission of Clare County Council that this issue needs to be reviewed.

## Conclusions

In conclusion, Clare County Council would like to submit that the Draft National Planning Framework is a document of considerable merit that proactively addresses many of the central issues in the sustainable growth and development of the country in the years ahead. However there are issues of national importance that have been omitted or have not been addressed to a significant extent and a reconsideration of these issues is essential before the National Planning Framework is finalised. In summary:

- The inclusion of key infrastructure projects, all of which have been subject to Strategic Environmental Assessment and Appropriate Assessment;
- The capacity of the University of Limerick – Clare Campus to be a driver of economic growth and it's designation as a Strategic Development Zone;
- The vital role played by Shannon Town and Shannon International Airport;
- The potential of Shannon Estuary

A reconsideration of settlement growth policy is also essential if the issue of rural decline is to be successfully addressed and the application of the definitional clarity set out above will ensure that settlement typology and terminology is applied consistently throughout the National Planning Framework.

Clare County Council again welcomes the opportunity to contribute to the preparation of a new National Planning Framework. The issues raised above are of vital importance to the balanced and sustainable growth of the country in the future and we trust that these issues will be taken into account before the National Planning Framework is finalised.

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Cllr. Tom McNamara  
Cathaoirleach, Clare County Council