

# CONSTRUCTION INDUSTRY FEDERATION

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**0168**

NPF Submission  
Forward Planning Section  
Department of Housing, Planning,  
Community & Local Government,  
Custom House,  
Dublin 1, D01 W6X0

**Re: Submission – National Planning Framework-  
Ireland 2040 Our Plan**

14<sup>th</sup> March 2017

Dear Sir/Madam,

Please find enclosed Submission regarding the National Planning Framework  
Ireland 2040 Our Plan for your attention.

Yours sincerely,



**Hubert Fitzpatrick**  
Director





# **National Planning Framework IRELAND 2040 OUR PLAN**

Submission to Department of Housing, Planning, Community & Local Government

15<sup>th</sup> March 2017

# **National Planning Framework**

## **IRELAND 2040 OUR PLAN**

### **Executive Summary**

With a population increasing by 26.5% over the past twenty years, and a continuing growing population, there is an absolute necessity for a twenty year Plan charting the future direction of the country for the next generation.

Key Principles to be considered under the 'Ireland 2040 – Our Plan' should include:

- Requirement for high level investment
- Need to fast track development of regional cities and a small number of large towns
- Necessity to drive economic growth with a focus on the regions
- Objective to minimise the number of unsustainable commuters
- Contribute to Irelands wellbeing
- Potential of development centres to self-grow
- Weak population growth of some regional cities/ major towns compared to Dublin
- Dispersal of population and growth opportunities
- Assessment of strategic locations.

In particular, the need for positive discrimination in favour of development of a small number of key regional locations is critical to the country maximising its overall economic growth potential. This policy should be designed that regions can flourish, can provide a spillover of benefits to adjoining rural areas, and provide a complementary option for investment other than Dublin whilst enjoying competitive advantage in terms of reduced costs and lifecycle choices.

Development Plans for strategic towns and investment plans by the State must be coordinated with the 'Ireland 2040 Our Plan'. Acceptable public transport, road network, broadband, educational facilities and services must all be available to ensure adequate connectivity between the selected regional locations and critical business locations. Fabric of existing towns and villages should be supported in reviving lifeblood into the heart of these settlements.

Critical investment decisions will be required to support infrastructure investment in the key identified urban areas to provide a healthy complementary alternative between the regions and Dublin.

Greater leverage should be applied in favour of urban development under the Plan so as to achieve the economies of scale for the strategic growth centres on a regional basis.

Best use of existing infrastructure is achieved by securing economies of scale in terms of development patterns. Rural dispersion of development does not make best use of infrastructure affording a region competitive advantage.

Ongoing monitoring of the implementation process is critical to the success of the Plan. The Department of An Taoiseach should be charged with this responsibility.

A key indicator to measure the success of the Plan is a measure of population and jobs supported in designated growth centres.

# National Planning Framework

## IRELAND 2040 OUR PLAN

### Introduction

Publication by the Department of Housing Planning Community and Local Government of the initial consultation paper in relation to 'Ireland 2040 – Our Plan' is fully supported by the Construction Industry Federation. The opportunity to outline an industry perspective in relation to the future direction of the country and how it develops over the next twenty years is most welcome.

The past twenty years has seen population increase by 26.5%. Using the same population growth rates, population could increase to 6.729m by 2047. This confirms the absolute necessity for a long term planning vision for the country.

It is recognised that there will be constraints on public finances in relation to the many wish lists that may be submitted by various consultees under this consultation process. Indeed, the many local aspirations that may exist in many communities, while desirable in those communities, will not all be attainable. Therefore, it is critically important that policy decisions taken in 2017 for a vision for Ireland in 2040 have a realistic possibility of being achieved and implemented while achieving maximum national economic benefit. These policy decisions must support Ireland Inc's national competitiveness and support the country in attaining its maximum sustainable economic growth rate and investment that supports the well-being of the entire population.

### Concepts and Principles for Balanced Regional Development

According to the National Spatial Strategy 2002 – 2020, key concepts and principles of balanced regional development at the time included:

- Potential, critical mass, gateways, hubs, complementary roles and linkages;
- Critical mass relates to size and concentration of population that enables a range of services and facilities to be supported. This in turn can attract and support higher levels of economic activity and improved quality of life;
- Strategic location of selected centres, nationally and relative to their surrounding areas, and provision of national scale social, economic infrastructure and support services;
- Further development of the five gateways at Dublin, Cork, Limerick/ Shannon, Galway and Waterford was a key component of the NSS at the time;
- A small number of other large towns, which had the potential capacity to become gateways and lead development in their regions, were to play a key role in achieving a more balanced role in regional development;
- Complementary roles for other towns, villages and rural areas: Various medium sized towns in each region were to act as 'local capitals' providing a range of services and opportunities for employment. Rural potential was to draw upon local economic strengths, supported by a stronger structure of smaller towns and villages as a focus for economic and social activity and residential development; and

- Linkages in terms of good transport, communications and energy networks were identified as vitally important to enable places and areas to play to their strengths.

These key concepts and principles remain critical and extremely relevant to the development of an achievable National Planning Framework (NPF) for the 'Ireland 2040 - Our Plan'. Ireland needs long-term planning with a focus for up to twenty years and beyond. A 'do nothing' option is not an option. Such an approach would inevitably lead to an eventual Dublin 'city-state' with further increases in the population gap between it and the next tier of population settlements. This will lead to a loss of national competitiveness and lost opportunities for our economy as a whole. There is a critical requirement for a more robust national planning framework. This long-term public planning policy in the national interest should supersede any quest for short-term decisions at the expense of the longer term benefit. This must also be supported by an efficient planning control system.

### **Ireland 2040 Plan**

Economic efficiencies, economies of scale and competitiveness must be achieved in the roll out of any new NPF. From a political perspective, a broad based party-political 'buy in' will be required if the objectives of an effective NPF are to be realised. The process of regular NPF monitoring and re-evaluation should be undertaken continuously and be evidenced based.

The following key principles should be considered.

#### **1. High Level Investment**

The 'Ireland 2040 - Our Plan' must contain high-level investment content and have Government departmental co-ordination. It must act as the strategic roadmap for allocation of capital expenditure in the long term. An interdepartmental steering group should be established to oversee implementation of the Plan. This should be chaired by the Department of An Taoiseach. Implementation will be key to delivery. In this context, the success in delivery of the Action Plan for Housing and Homelessness in Rebuilding Ireland could be used as an example of how to achieve coordination and implementation across an extensive range of Government departments, agencies and stakeholders. At the same time, a role should also be created for the Planning Regulator to ensure consistency of all subordinated Development Plans and Investment to the 'Ireland 2040 Plan'.

#### **2. Fast Track Development of Regional Cities and Small Number of Large Towns**

The primary objective of any new NPF should be to fast-track the development of Ireland's regional cities and a small number of large towns which have recognised growth potential. This should be designed so as to generate and support an economic 'spillover' into the adjoining smaller towns and villages within each of the regions. The fast track development of Ireland's regional cities/ large towns will depend on infrastructural development to connect the economic clusters that are present in these cities and towns.

Currently, we need to recognise that our major population centres are all located on the coast. However, we also need inland city/development zones which could be in the form of a polycentric model as was identified under the NSS.

### **3. Drive Economic Growth with Focus on Regions**

The purpose of the NPF 'Ireland 2040 – Our Plan' should be to drive economic growth, with a focus on the regions. It is recognised that national and regional growth depends on strong and vibrant city regions and larger/ cluster towns. This will have the effect of complementing our national economic growth rates. It will capitalise on many foreign direct investment opportunities that could otherwise be lost to the country due to a potential lack of competitiveness. Reasons for this lack of competitiveness could be due to the increasing cost base that could arise in the general Dublin area and deficit in adequate infrastructure/ services in potential regional growth centres.

### **4. Minimise Number of Unsustainable Commuters**

The NPF must be designed so as to minimise the number of unsustainable commuters. This can be achieved by ensuring that selected regional centres can adequately complement Dublin to secure and retain employment opportunities and its offering of different lifestyle choices. This requires the distribution of economic activity and achievement of population centres of scale on a regional basis.

### **5. Contribute to Ireland's Potential Wellbeing**

The primary task of the new NPF must be to contribute to Ireland's potential economic wellbeing. To enhance the country's competitiveness, the focus must address the fragile economies of scale that exist countrywide. The objective should be for the selected growth centres to be self-generating and growing at levels considerably above the commensurate State average growth rate, both for population and employment criteria. This can only be achieved by all counties adhering to their development plans and all state agencies adhering to the NPF objectives.

### **6. Potential of Development Centres to Self-Grow**

The selected development centres must be potentially 'viable' in being able to self-grow organically. A State development strategy policy of concentration of infrastructural and support services will be required in key centres. This requires the recognition and acceptance of the benefits of urban concentration and the subsequent 'central' to 'periphery' spillover of benefits to the adjoining catchment areas.

### **7. Large Settlements Compared to Dublin Area**

With the exception of Cork and Galway, all of Ireland's large settlements are displaying weak population growth compared to the population growth of the greater Dublin area. There is an economic need to increase the size of these larger settlements to a minimum 'threshold level' affording them a critical leadership role in their region. This leadership role for the larger settlements will in turn boost their own region's overall growth.

### **8. Dispersal of Population/ Growth Opportunities**

Since 2002 the number of towns of 1,500 population and upward has increased by 35%. The count of one-off houses continues to increase. The growth in one-off houses appears to be far in excess of the rational criterion of what is necessary for meeting 'local needs' which are associated with agriculture and extractive industries such as forestry, mining, fishing and other rural-based economic activities. The country is 62% urbanised. Statistics such as these have an adverse

economic effect, curtailing potential competitiveness potential, increasing servicing and infrastructural capital costs whilst incurring additional diseconomies-of-scale. This in turn contributes to the volume of fast-growing medium and long-distance commuter journeys.

## **9. Assessment of Strategic Locations**

In any assessment of strategic locations, key factors to be considered include:

- Requirement for the selected locations to play pivotal regional geographic roles;
- Proximity to UK and Continental ports/ airports and transport infrastructure;
- Proximity to important tourism and cultural centres; and
- A city's minimum population should be circa 50k. Where this doesn't exist, polycentric models should be permitted.

Proximity to continental ports is especially important for the agri-food, pharmaceutical, bio-pharmaceutical and med-tech industries in the context of the Brexit decision. Evidence of the strategic locations' ability to attract, retain and grow population organically should also be a significant factor.

A pitfall to be avoided may be the specific quest by some to find 'one for everyone in the audience' syndrome. It is important that appropriate regional/spatial planning and economic competitiveness tests prevail in any assessment of key strategic centres. This should be designed to ensure the longer term economic benefits for the country as a whole is realised.

Sparsely populated provincial towns will struggle to win "high-value" multinational investment in the short term because they cannot complement the offering of larger urban centres. Dublin is increasingly competing for investment not against other Irish population centres but against European capitals such as Amsterdam, Geneva and Paris. In many cases, it is unrealistic to expect regions disadvantaged by their remoteness to attract significant research, development or manufacturing projects which are vital to the State. The established tendency is for global players to locate only in large cities/ strategic locations with significant regional growth potential.

Focusing exclusively on local needs while ignoring wider trends run the risk of long term decline in the regions. The focus for investment must be on quality, location and associated national economic benefits.

### **Ireland's Characteristics to Influence the Ireland 2040 Plan**

Some of the country's characteristics include the following:

- Choice of growth centres is constrained due to the small size of the country's towns;
- Between 2011 and 2016, the population of the four provincial cities together with their respective counties (Cork, Limerick, Galway and Waterford) grew by 3.44%, while Dublin city and county's population grew by 5.68% in the same period;
- Recent strong population growth has contributed to a proliferation of small settlements;
- Rural one-off housing is not necessarily confined to rural 'needs';
- Strongly-growing dormitory towns are formed around the cities;
- Services-sector employment opportunities are quite limited in the dormitory towns; and

- Significant growth in medium and long-distance commuting.

#### **Limit the Number of Growth Centres**

The new NPF 'Ireland 2040 – Our Plan' should limit the number of regional growth centres. This would reduce the risk of undue growth in number of unsustainable settlements and increase the selected growth centres' potential to grow. It would enable critical mass to be achieved and thereby capture the benefits of urban economies of scale and network effects. The objective is to concentrate job creation and residential locations into a limited number of cities and the largest towns. This would enhance the land-use and transportation interface whilst achieving the necessary economies of scale. National 'Core Planning Strategy' objectives should be deployed to channel future growth into the nominated centres.

Competitiveness and scale economies associated with concentrated investment in infrastructure will encourage energy efficiencies including reduced home-to work commuting, better urban design and the recycling of brown-field sites.

The development of major regional centres, to be identified in the NPF/Ireland 2040 Plan will be critical if areas outside Dublin are to win substantial projects. Governments must focus on nurturing selected strategic growth centres.

### **General industry Responses to Key Headings and Questions: Ireland 2040- Our Plan**

#### **1. Peoples Health and Well Being**

Now is the time for Ireland to shape and influence the future direction of the country for the next generation. Policy decisions taken today will impact on future generations' lives. An achievable and sustainable number of regional/growth centres must be identified all of which have capacity to be serviced with the required health and social/ community service facilities to cater for the surrounding population.

Likewise, a healthy lifestyle is supported by adequate recreational facilities. Government policy should support investment in such recreational facilities alongside health services. This will assist in ensuring that government investment is capable of leveraging additional investment from the private sector for sustainable services in these selected regional/ growth areas.

#### **2. A Place - Making Strategy**

Cities and strategic regional towns have a critical part to play in the development of Ireland's 2040 Plan. It is critical that development plans for the cities and strategic towns and their adjoining areas are co-ordinated to ensure that a proper planning and development framework is established for each of the development areas. Such plans must be aligned with investment priorities determined by the State. It is critical that planning authorities within the regions can complement the preparation of city and environs development plans to ensure that required and desirable services for the regional and local population can be delivered. With the introduction of an acceptable public transport system and road network serving these selected growth centres and their adjoining hinterlands, the determination of a realistic green belt area surrounding these centres maybe appropriate to ensure structured development of



scale. This will assist in a non-proliferation of ribbon/ sprawl type development on the external perimeters of the selected growth areas. Towns within the wider hinterland of cities must be capable of accommodating defined increasing populations in accordance with the Department of Housing's Core Strategy to complement the attractiveness of the cities for securing increased foreign direct and indigenous investment.

While the 'Ireland 2040 – Our Plan' should focus on strategic development centres, the Plan can still support the built fabric of existing towns and villages in rural Ireland which are dying so as to stimulate regeneration of elements of the decaying fabric of these areas. Vacancy/ void rates in commercial and residential buildings on main streets on existing towns (the existing built up areas) should be addressed by proactive measures to stimulate their occupancy and breathe life back into central cores of rural towns and villages.

### **3. Opportunities for our Region**

Effective regional development will require coordinated regional and local planning policies supported by Government Departments, Regional Development Organisations, State Agencies and local planning authorities. Coordination with all stakeholder bodies will be key in ensuring consistency in implementation and measurement of progress against stated goals of effective regional development. Consistency of development plan implementation in all regions in accordance with regional policy will be essential.

Mandatory compliance requirements with the Government targets established under the forthcoming National Planning Framework 'Ireland 2040 – Our Plan' must apply. Each region must acknowledge its strengths that support it to achieve its full potential rather than have an expectation that unsustainable high levels of growth can be achieved everywhere.

Each region should be assisted to be self-sufficient in terms of services including retention of human capital. A Key growth centre in each region should be identified to act as a central focus with potential to complement the Dublin offering. To this end, Government's and Agencies' investment plans must positively leverage each region's strengths so that they have the required connectivity and services to realistically compete with the capital city which runs the risk of becoming increasingly uncompetitive for FDI and further job creation. Regions must be capable of offering an alternative that is attractive to our younger workforce to seek out and secure education and employment in the regions.

### **4. The Potential of Rural Ireland**

Connectivity including high speed broadband is critical to rural Ireland maintaining social contact and development of business models to sustain and grow local communities. Connectivity will support innovative employment generation opportunities ensuring that the rural skills are harnessed to support not only local communities but also support regional development and economic growth targets set nationally.

One has to determine what is realistic for maintenance of employment in areas which are subject to population decline. It is not realistic to anticipate foreign direct investment to support creation of secure employment and development opportunities in each and every parish. However, population decline can be averted if there is a reasonable expectation that employment can be sourced in an adjoining growth centre which may be located some sustainable commuting distance away. Critical investment decisions will be required to support infrastructure in key urban centres which have the potential to complement Dublin,

thus creating centres of excellence offering services and facilities that complement the Dublin offering at a fraction of Dublin based costs.

Irish agricultural communities and other traditional rural based economic activity must be supported in rural Ireland where there is a justifiable need for it. However, over the past decade, rural housing has tended to grow at a faster rate than the sustainable population growth rate in rural areas. This militates against the development of major regional centres of scale capable of delivering quality services for all its inhabitants.

As it is economically desirable that growth of regional centres of population be stimulated, it follows that the costs of development and construction in these areas should be supported. Rural housing will have a greater long run cost to the Exchequer in terms of infrastructural services and social support services as the years go by. Indirect subsidies to live in the countryside can be counter-productive to growth of our major population centres. Positive discrimination should be exercised in favour of urban development as opposed to rural development. This could be reflected in development levies that may be imposed so as to encourage development into urbanised environments making maximum usage of infrastructure provision.

## **5. Ireland In an All-Island Context**

Following the UK referendum result on Brexit, retention of the North South Ministerial Council is critical for joint planning and engagement on key issues. Upgrading of connectivity in terms of energy, broadband and transport will be critical to avoid possibility of significant border areas being 'left behind' in terms of having an acceptable level of infrastructure to compete. Economic opportunities will develop in the key urban centres within close proximity of the border for development and retention of key relationships within Europe. That said, it is acknowledged that a range of these border areas will be subject to a significant disadvantage in the short term in the event of tariffs being imposed, the prevalent currency fluctuations that will arise together with the possibility of passport type controls being imposed.

## **6. Integrated Land and Marine Development**

It is critical that identified infrastructure which enhances continued economic growth must be supported. The National Ports Policy which identified Ireland's three 'Tier 1' ports (Dublin, Cork and Shannon Foynes) together with the proposed redevelopment of Galway must be reflected in the NPF 'Ireland 2040 – Our Plan'. All related connectivity, road and rail infrastructure upgrades must be provided for in relevant regional and local development plans, and included in Public Capital programme provisions. In the context of the Brexit decision, it is vital that infrastructure upgrades be provided to ports servicing Europe so that exports especially from the agri-food, pharmaceutical, bio-pharmaceutical and med-tech sectors can be delivered in a more timely and efficient manner to continental ports.

## **7. Ireland's Unique Environment – Climate Change and Sustainability**

A proper planning and development system requires adequately resourced forward planning teams to deal initially with the broad macro planning and development policies to be determined centrally, regionally and then locally. The timely preparation of regional, county

and local area development plans will be a pre requisite. Adequate resourcing of forward planning teams in planning authorities will be required.

A schedule detailing the infrastructure required to implement the NPF/ Ireland 2040 objectives is clearly required together with commitment for delivery of that infrastructure within the lifetime of the NPF/ 'Ireland 2040 – Our Plan'. Key target dates should be outlined within the NPF 'Ireland 2040 – Our Plan' for delivery of key infrastructural services.

## **8. Equipping Ireland for Future Development Infrastructure**

The NPF 'Ireland 2040 – Our Plan' provides the opportunity to determine the most appropriate spatial patterns for Ireland for the next twenty years. This in turn will determine the key infrastructure required to support development of and maintenance of essential infrastructure to support the competitiveness of the growth centres selected under the NPF. Nationally important infrastructure projects required will include water and waste water services, national and regional roads, broadband connectivity, health projects, educational projects and recreational/amenity projects. It will also be critical for the regional growth areas to flourish and support one another that a road network is available to avoid the congestion around the Greater Dublin area.

Best use of existing infrastructure is achieved by securing economies of scale in terms of development patterns. Rural dispersion of development does not make best use of infrastructure. Development of regional centres of scale will make most efficient use of infrastructure while providing quality services to its inhabitants and retaining the attractiveness of the area for both employers and employees.

The development of Core Strategies by the Department of Housing Planning Community and Local Government and their roll out to the Regional Assemblies for determination of population projections for each local authority area is critical for planning for future population levels and for the required infrastructure. Government departments and State Agencies should then be obliged to progress delivery of the required infrastructure to facilitate the population projections established.

All new enabling development is now a source of revenue for local government or for the Exchequer. Residential developments will pay local property tax while commercial developments will pay commercial rates, commercial water charges and provide employment opportunities. These additional sources of revenue should be ring-fenced as a contribution to the capital cost of providing the required infrastructural services.

New growth centres to be developed at scale will require provision of social infrastructure. In many cases, the cost of providing such social infrastructure will require State support. An increasing population and increasing economic growth rate must support an increased spend level in the States public capital programme. It is not realistic to anticipate that unsustainable increases in development levies to be paid by occupiers of new buildings alone can fund the scale of infrastructure required in these areas.

Funding of infrastructure in the States public capital programme must be restored to levels appropriate for developed economies with growing populations. Without such a commitment, achievement of objectives set out in any long term strategic plan will not be achieved.

## **9. Enabling the Vision – Implementing the National Planning Framework**

Common goals to apply to implementation and monitoring of the NPF include realistic viability testing for identified key growth centres in terms of infrastructure and service provision. Identification of key centres will have to have due regard to any significant planning constraints in terms of particular EU Directives or other associated strategic environmental issues. However, goals will only be achieved if the required servicing of development lands for services such as water and transport services are addressed within the lifetime of local development plans. Objectives for preparation of Local area Plans must also be met within a reasonable period of adoption of the relevant Development Plan.

It is probable that some areas which are strategically identified as significant growth centres will be subject to some opposition, while those excluded from being a growth centre might be subject to an alternative form of dissatisfaction. It is suggested that legislative amendment be undertaken so that objectors to critical development decisions, in taking their cases to the Planning Appeals Board An Bord Pleanála, and delaying critical projects which are supported by the Ireland 2040 Plan should have a 'locus standi'. In addition, they should fulfil the same criteria as if they were objecting to the Courts, i.e. have the capacity to fund costs if they don't succeed in any actions undertaken to prevent development.

Sustainable planning outcomes should be recognised and rewarded by an appropriate branding of the development and possible support for the project promoter in formulating and developing a subsequent sustainable project in accordance with the strategic long term plan. This could take the format of relief or partial relief for an element of development contributions payable.

An interdepartmental group preferably chaired by the Department of An Taoiseach should be an appropriate steering group to monitor implementation of the NPF Ireland 2040 and to highlight any inconsistencies that may emerge to the strategic plan as agreed.

A key indicator to measure the success of the Ireland 2040 Plan is a measure of population and jobs supported in the designated growth areas. This should be comparable to national figures and population catchments prior to adoption of the Plan.

In developing the objectives of the NPF the following should be considered. The natural development zones to compliment Dublin will be the coastal cities of 50k population or more. Ireland does not have towns with the critical mass to complement Dublin outside the coastal cities. Therefore the polycentric model to create the required critical mass should be used. This will enable critical infrastructure of clustered / polycentric towns to be joined up.

**14 March 2017**