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Submission on the National Planning Framework: Ireland 2040

On behalf of Renua Ireland



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1 INTRODUCTION

1.1 Introduction

On behalf of our client, **RENUA Ireland**, we wish to make the following submission to the **National Planning Framework: Ireland 2040 Our Plan – Issues and Choices Paper**. The purpose of this submission is to set out the views of **RENUA Ireland** regarding the future direction of strategic spatial planning in Ireland.

RENUA Ireland envisage a new national spatial planning strategy which drives growth within a select group of urban settlements, across Ireland. Consolidated growth together with coordinated infrastructure investment will create critical mass and thus sustainable urban settlements which will be drivers of growth within the regions. A small number of stronger, sustainable urban settlements across Ireland will act as a counterbalance to the Greater Dublin Area which has seen disproportionate levels of growth since the early 2000's. While the continued strength of Dublin is important in the national context, it is important to provide some level of counterbalance through strong regional settlements such as Cork, Waterford, Limerick, Galway and Sligo.

As part of this submission we will set out a review and critique of historic and emerging National Strategic Planning Policy. We will also set out **RENUA Ireland's** vision for the adopted National Planning Framework (NPF).

1.2 About RENUA Ireland

RENUA Ireland is a political party committed to the development and implementation of competent, evidenced based economic and social policies, to the creation of a society of expanding opportunities, to compassionately promote self-reliance and the common good, to encourage and reward human endeavour in an enterprise culture that spans the social, public and private sectors, to minimize disadvantage by removing barriers to personal growth and to fostering economic and social mobility for all.

In the context of strategic planning policy **RENUA Ireland** recognise the infrastructure issues faced by Dublin and the need to drive development across Ireland. **RENUA Ireland** supports a national policy that invests in regional settlements. The creation of living cities with vibrant town centres, supported by a policy of Business Improvement Districts is a key priority.

2 NATIONAL STRATEGIC PLANNING POLICY - CONTEXT

2.1 National Spatial Strategy 2002-2020

The National Spatial Strategy (NSS) was published on 28th November 2002. The purpose of the NSS was to provide a national planning framework for Ireland. The NSS aimed to achieve a better balance of social, economic and physical development across Ireland, supported by more effective land use planning. It envisaged a greater share of economic activity taking place outside of the GDA. In order to drive development in the regions, the NSS proposed a network of nine 'gateways' (comprising Dublin, Cork, Limerick/Shannon, Waterford, Galway, Dundalk, Sligo, Athlone/Tullamore/Mullingar, Letterkenny/Derry) and nine 'hubs' (Cavan, Ennis, Kilkenny, Mallow, Monaghan, Tuam, Wexford, Ballina/Castlebar and Tralee/Killarney). The aim was to focus growth on the Gateways in order to achieve critical mass and to achieve more regionally balanced development. The gateways were to be supported by and provide support to the network of nine strategically located hubs. Below the gateways and hubs, the NSS included 'county and other towns' where it was envisaged that balanced patterns of growth would be further supported by 'county towns'. These towns would capitalise on local and regional roles with links to the hubs and gateways. Beyond these areas the NSS identified 'vibrant and diversified rural areas'. These areas were characterised as benefiting from enhanced local employment options and from development of their resource potential.

The overall approach to achieving balanced regional development is summarised in the NSS as:

*'By targeting strategic centres with the potential to be drivers of development at national level and within their own regions, and by including country towns, smaller towns, villages and rural areas in this process, a dynamic urban and rural structure can be achieved.'*¹

The NSS was significant because it was the first 'national spatial' plan for Ireland. Fifteen years on it is clear that while there were some successes there were significant shortcomings in particular with the implementation of the NSS.

2.1.1 Critical Assessment

The NSS was not a success in the national context. In 2010 the Government published its own review of the NSS entitled 'Implementing the National Spatial Strategy: 2010 Update and Outlook'.²

This report records that population growth in the Dublin, Cork, Limerick/Shannon and Waterford gateways was below the national average between 2002 and 2006. Galway, the other four gateways (Sligo, Dundalk, Letterkenny and Athlone/Tullamore/Mullingar), together with hub towns grew at rates only marginally above the national average. The report also highlights the major changes in the structure of smaller towns and rural areas.

*'Almost half (48%) of total urban population growth between 2002 and 2006 took place in urban areas with a population of less than 10,000 in 2006, although these towns accounted for only 20% of the national total.'*²

¹ DEHLG(2002) National Spatial Strategy for Ireland 2002-2020

² DEHLG (2010). Implementing the National Spatial Strategy. 2010 Update and Outlook

This population growth occurred in smaller settlements and rural areas within a 50/80 km commuter distance of major urban centres. This growth was outside the network of gateways and hubs which were planned to be the focus of growth and has resulted in a dispersed settlement pattern with the associated increase in private car use for the purposes of commuting.

While acknowledging, what hasn't worked, the report draws attention to some elements of the plan that have worked well. Notably, significant investment in public infrastructure that came about during the lifetime of the plan, including transport, better housing and improved water and waste services, have created the conditions for long-term economic progress.

Analysis undertaken by Van Egeraat and Curran, in the paper Gateways, Hubs and Regional Specialisation in the National Spatial Strategy (2013), reviewed trends in employment in the gateways and hubs and the evidence of sectoral clustering at a regional level over the period 2001-2011. The term 'sectoral clusters', in this research paper, refers to the NSS recognised spatial clusters of international excellence which are particularly focused around the city regions and other strategic locations. These spatial clusters include pharmaceutical and chemical companies in the Cork City area, information and communications technology in the Mid-West, food in the North East and health care and medical devices in the Midlands.¹ A key aim of the NSS was to create a strong enterprise base supported by the critical mass provided by the gateways and hubs. The analysis concluded that only two of the identified gateways, Cork and Galway, had performed strongly over the period recording a rise in their share of national employment, while Dublin continued to claim a disproportionate share of new employment creation particularly in the context of inward foreign investment in the period 2001-2011. Furthermore, it is noted that there was little progress in cultivating regional specialisations. Galway and Cork are again identified as having done well in this regard specialising in medical devices and electronics respectively.²

The failings of the NSS in terms of employment and population growth are reflected by the Department of Housing, Planning Community and Local Government (DHPLG) in the 'Ireland 2040 Our Plan Issues and Choices' document. The Issues and Choices document notes that the twenty-two fastest growing towns in Ireland between 2002 and 2016 were not identified hubs or gateways⁴. Furthermore, these twenty-two towns were smaller at the outset and achieved almost identical actual population growth to twenty-two gateways and hubs, excluding Dublin.

Several factors contributed to failings of the NSS and these are discussed below.

- **Decentralisation**

In December 2003, just 12 months after the publication of the NSS the Government announced a plan for decentralisation of 10,300 Dublin based civil and public servants to 53 locations across Ireland. These locations included only four of the gateways and five of the hubs, representing less than 25% of the decentralisation locations [Hughes, 2015]⁵. Many of the gateways and hubs

¹ Breathnach, P., Curran, D and Van Egeraat, C. [2013]. Gateways, hubs and regional specialisation in the National Spatial Strategy. Administration Journal, [online] Volume 60(3), p 91-113. Available at: http://eprints.maynoothuniversity.ie/4506/1/PB_gateways_hubs.pdf [Accessed 7.03 2017]

⁴ DHPLG. (2017). Ireland 2040 Our Plan Issues and Choices

⁵ Hughes, Brian, "Effects of the 2002-2020 National Spatial Strategy (NSS) on Ireland's Settlement Growth, Its Cities and on Other Gateways and Hubs" (2015) Articles. Paper 34

were omitted from the program including Cork, Galway, Dundalk, Letterkenny, Kilkenny, Ennis, Castlebar/Ballina and Tuam.

The lack of alignment of the NSS with other Government departmental plans, such as the decentralisation plan significantly undermined the NSS.

- **Lack of Plan Led Growth**

Implementation of the NSS suffered during an era of developer led rather than plan led growth. Such development was often greenfield, dispersed and resulted in the widespread growth of car based commuter settlement patterns. Planning decisions being made at the local level did not have sufficient regard to the NSS. This lack of implementation is reflected in the absence of accelerated population and employment growth in the gateways and hubs as discussed above. Brian Hughes, in his 2015 article on the subject, articulates this view as follows –

*'Instead of the intended objective of achieving accelerated growth in the nominated Gateways and Hubs, Balanced Regional Development encouraged additional, geographically scattered one-off housing completions.'*⁶

- **Lack of Focussed Growth in Irelands Regional Settlements**

The NSS identified twenty-three towns and cities as gateways and hubs. It also identified a rural settlement and housing framework which provided;

- Support for urban generated housing in the built up rural areas and on lands identified through the development plan process and;
- Support for rural one off housing associated with rural housing need.

The NSS approach was akin to 'something for everyone'. Too many gateways and hubs meant that resources were spread too thinly over too many geographically disparate locations. This interpretation of balanced regional development contradicted the stated objective to create critical mass and growth within the strategically located gateways (regional settlements). The failure to achieve critical mass in the regional settlements, in the context of Dublin's dominance, is acknowledged by Hughes (2015)⁷.

'The physics of 'balance' as in a playground see-saw, fails to work effectively, if the aggregate population of the four provincial cities is just 37.67% that of Dublin.

2.2 Ireland 2040: Our Plan Issues and Choices

The purpose of the paper is to set out the main issues and possible choices for the development of Ireland as a place, beyond 100 years of statehood over the next twenty years or more, to 2040. The new National Planning Framework (NPF), the successor to the NSS, is needed to address the changes and challenges in population, employment and environment in Ireland up to 2040 which include:

⁶ Hughes, B. (2015) Effects of the 2002-2020 National Spatial Strategy (NSS) on Ireland's Settlement Growth, Its cities, and on Other Gateways and Hubs, P5, Para 3

⁷ Hughes, Brian, "Effects of the 2002-2020 National Spatial Strategy (NSS) on Ireland's Settlement Growth, Its Cities and on Other Gateways and Hubs" (2015).Articles. Paper 34

- A national population increase of approximately 1 million extra people, almost a quarter whom will be over 65 by 2040;
- More than 500,000 additional people at work, many of whom will be in high skilled jobs in and around cities;
- At least 500,000 extra homes needing to be close to services and amenities; and
- Major environmental challenges.
- Energy/low carbon based economy.⁸

The NPF will be a high-level framework for future investment and development in Ireland. RENUA Ireland strongly supports the need for a new spatial plan for Ireland. The ongoing and unsustainable growth of the GDA, which will ultimately be to the detriment of the rest of Ireland, must be addressed in the adopted framework document.

2.2.1 Place Making Strategy - Capital, Cities and Towns

RENUA Ireland supports the principle of living in towns and cities and acknowledges the significant potential of Ireland's regional cities. RENUA supports the principle that Ireland's regional settlements should be the focal point to drive regional growth and development. Cork, Limerick, Galway and Waterford are all major centres of employment, provide third level education and healthcare and are accessed by the motorway network. Sligo as the primary settlement in the north west should also be identified as a regional settlement for focused growth within the NPF. Sligo has the following attributes which make it an ideal location for investment and growth:

- Established regional centre with large population catchment in surrounding rural hinterland.
- Existing critical mass of population to facilitate future infrastructure and services investment.
- Higher order services located in the town i.e. University Hospital Sligo, Sligo Institute of Technology and St. Angela's College (NUIG).
- Strong existing infrastructure i.e. seaport, airport, road, rail and bus connections to Dublin.
- Educated workforce emerging from third level institutions.

2.2.2 Ireland in an All-Island context

The NPF issues and choices paper recognises the high levels of spatial interactions at a number of cross border routes. Commuting patterns between Derry and Donegal and between Newry and Dundalk are highlighted. It is noted:

*'These travel patterns suggest a number of settlements on each side of the border have functional relationships with urban centres in the adjoining jurisdiction.'*⁸

There are opportunities for cross border synergies in tourism, infrastructure investment and development, as well as enterprise. RENUA Ireland therefore supports a new plan which connects with spatial frameworks in Northern Ireland and encompasses the opportunities for coordinated growth. Of key importance in the all island context is the need for enhanced transport infrastructure. The IBEC/CBI report 'Connected- A Prosperous Island of 10 Million People'⁹ sets out a comprehensive proposal to upgrade the all island transport network. The report notes:

⁸ National Planning Framework: Issues and Choices Paper. Department of Housing, Planning, Community and Local Government, 2017. Print

⁹ Connected - A Prosperous Island of 10 Million People. Ibec/CBI.2016.Print

'Efficient movement of people, capital, goods and services is crucial to an effective, competitive and modern economy. Failure to invest in transport infrastructure affects quality of life, exacerbates peripherality and stifles opportunities for economic growth as global connectivity continues to improve.'

RENUA Ireland support a co-ordinated and comprehensive approach to connecting places through infrastructure.

2.2.3 The Potential of Rural Ireland

RENUA Ireland support the need to address declining rural areas in a manner which the NPF refers to as building on 'Excellence in Rural' i.e. sectorally across agriculture, the marine, renewables, tourism etc.¹⁰ RENUA Ireland believes that Ireland's expertise in Agriculture and Information Communications Technology can be combined to address the challenges of food supply and develop a smart agricultural industry which can become a world leader in developing technologies and methods to increase productivity and efficiency. This will also facilitate the continued growth of Ireland's crucial export sector which relies on high quality agricultural practices.

The NPF states that intervention is needed to prevent the continued reliance on urban generated one off housing, which perpetuate car dependence across rural Ireland and which undermine the viability and vitality of nearby villages and towns as places to live. RENUA Ireland consider that the revival of rural towns and high streets can be supported by the provision of appropriate scale housing infrastructure within settlement boundaries helping to create a critical mass of population. Creating critical mass of population within settlement boundaries can in turn help sustain local services and shops. Supporting the organic growth of rural towns within existing settlement boundaries will require the controlling of one off 'urban generated' housing in the open countryside.

2.3 Realising our Rural Potential: Action Plan for Rural Development

The objective of this Plan is to unlock the potential of rural Ireland through a framework of supports at national and local level. It seeks to ensure that people who live in rural areas have increased opportunities for employment locally and access to public services and social networks that support a high quality of life. The policies and objectives of this plan are important if we are to avoid the shortcomings of the NPF and create a new spatial plan that achieves growth in regional cities and rebalances Ireland.

The Plan contains 276 specific actions across the following five key pillars:

- Supporting Sustainable Communities
- Supporting Enterprise and Employment
- Maximising our Rural Tourism and Recreation Potential
- Fostering Culture and Creativity in Rural Communities
- Improving Rural Infrastructure and Connectivity

RENUA Ireland welcome the coordinated implementation of initiatives for Rural Ireland across the various Government Departments.

¹⁰ National Planning Framework: Issues and Choices Paper. Department of Housing, Planning, Community and Local Government, 2017. Print

3 RENUA'S VISION

The following section of this report will set out the views of RENUA Ireland on what Ireland will look like in 2040.

Settlement Hierarchy

Tier 1 Regional Settlements as Regional Economic Drivers

The NPF must clearly identify a settlement hierarchy. The five regional settlements – Cork, Waterford, Limerick, Galway and Sligo, comprise Tier 1 settlements and should be targeted for major employment growth and housing construction to act as a counterbalance to Dublin. These settlements provide third level education and healthcare and are accessible to the motorway network, airports and ports. Sligo as the primary settlement of the north west should also be included as a Tier 1 regional settlement for focused growth. Sligo has the following attributes which make it an ideal location for investment and development:

- Established regional centre with large population catchment in surrounding rural hinterland.
- Existing critical mass of population to facilitate future infrastructure and services investment.
- Higher order services located in the town i.e. University Hospital Sligo, Sligo Institute of Technology and St. Angela's College (NUIG).
- Strong existing infrastructure i.e. seaport, airport, road, rail and bus connections to Dublin.
- Educated workforce emerging from third level institutions.

Creating critical mass within these regional settlements will enable them to act as economic drivers for regional growth.

Plans for this growth should be developed concurrently with capital works investment programmes which ensure that the infrastructure is in place which will facilitate this growth (i.e. healthcare, housing, education, public transport, waste water). The NPF must acknowledge the importance of a co-ordinated and comprehensive approach to connecting places through infrastructure such as upgrades to the all island transport network.

In respect of housing in the Tier 1 settlements Ireland has in excess of 198,000 empty homes. The NPF must include policies to bring back into use these vacant homes across Ireland. In RENUA Ireland's view the Government's Repair and Lease Scheme should be extended to low/middle income earners who do not qualify for social housing but who are also priced out of home ownership and are facing difficulties renting in an overheating rental market with rising rents.

In recent years, there has been significant growth at nodal points along strategic corridors around the country i.e. Dundalk/Drogheda/Ardee on the M1/ N2 North South corridor and similarly in Portlaoise on the M7 Dublin-Limerick corridor. Suitable areas along these corridors could be potentially identified as Enterprise Development Zones to foster and encourage further economic growth and employment.

Tier 2 Towns with a Population >10,000

This submission adopts the Commission for the Economic Development of Rural Areas (CEDRA) definition of Rural Ireland (except Sligo) as:

All areas located beyond the administrative boundaries of the five largest cities.¹¹

In rural Ireland beyond the five Tier 1 higher order regional settlements RENUA Ireland propose designating approximately thirty towns which should act as second tier service/support towns. These towns will generally have a population in excess of 10,000 people. The purpose of these towns is to support the primary functions of the Tier 1 settlements. It is envisaged that these towns will be close, in geographical terms, to the Tier 1 regional settlements. They will facilitate growth in their own right but at an organic level and not anywhere near the level of growth which will be targeted at the main settlements. It is envisaged that the primary employers in these settlements will be SME's and local services.

Recent decades have seen many changes in these rural towns, the main streets of which are characterised by vacant shops, pubs that have closed, premises for sale and many derelict buildings. RENUA Ireland envisages that life can be brought back into these towns through the roll out of the Business Improvement District (BID).

BID's involve business ratepayers voting for a self-imposed levy on top of commercial property tax to pay for services in addition to those provided by local government. They provide a unified voice and engagement and a private sector led solution for centre management.

The availability of a high-speed broadband network throughout the country will be essential for these towns to fulfil their role as second tier service/support towns. High-speed broadband has become both an essential requirement of the workplace and can also facilitate home working. If these towns are to retain population and grow organically the NPF must align with capital investment plans to properly direct investment in high-speed broadband infrastructure.

Tier 3 Towns, Villages and Rural Areas – Population <10,000

Beyond the second-tier towns lie towns and villages with populations of less than 10,000 as well as the country's rural heartland. These settlements will rely on the second-tier towns for higher order services and facilities. A priority for these areas is to develop fibre broadband capability. Commitment to broadband infrastructure investment throughout rural (and urban) Ireland is essential to facilitate the development of rural business and enterprise. It will be an essential factor in the attractiveness, and thus sustainability of rural Ireland beyond the five regional settlements and the Tier 2 towns.

A hierarchy which focusses major growth in the five regional settlements supported by thirty second tier towns acknowledges that not every settlement across rural Ireland should be earmarked for growth as this is unsustainable. These towns and villages should focus on resilience and working to retain population and should be encouraged to identify niche activities which will sustain them whether that be tourism, agriculture, renewable energy.

¹¹ Energising Ireland's Rural Economy: Report of the Commission for the Economic Development of Rural Areas, Commission for the Economic Development of Rural Areas (CEDRA), 2014, Print.

The new NPF must set out a robust framework which has a statutory foundation to ensure that at the local level planning decisions must take account of its provisions and are not subject to political interference. Recent decades have seen the proliferation of urban generated single one of dwellings across rural Ireland and the new NPF should seek to control this type of development.

Implementation

The new NPF must provide a clear and focused approach to implementation and delivery. The new NPF should commit to:

1. Directing infrastructure investment into the recognised growth areas i.e. the Tier 1 settlements.
2. Provide clear guidance for cross departmental (and border) government infrastructure investment which is aligned with the policies and objectives of the adopted National Planning Framework. Ensure that all government plans and strategies are statutorily obliged to accord with the provisions of the NPF where relevant.
3. Ensure that the National Planning Framework has a statutory basis so that regional and local plans align with it while ensuring that no development management decisions can be made which contravene its provisions.
4. Drive population and employment growth in the selected urban settlements (Tier 1), supported by organic growth in thirty service/support towns (Tier 2), and sustainable growth and controlled one off urban generated housing in the Tier 3 towns, villages and rural areas.
5. Regular review. The plan is proposed to be a 20 year document. However economic, social and environmental circumstances evolve within significantly shorter timescales. Thus the new plan must be adaptable and subject to review. These reviews could be undertaken on a 5 year basis and on the back of their findings amended policies and objectives could be introduced.

RENUA Ireland consider that the Business Improvement District (BID) model provides a sound model for implementation of organic growth in the Tier 2 towns. As detailed earlier in this submission BID's involve business ratepayers voting for a self-imposed levy on top of commercial property tax to pay for services in addition to those provided by local government. They provide a unified voice and engagement and a private sector led solution for centre management.

Sligo BID provides a good case study example of the BID initiative. It was the first BID to form on the west coast of Ireland (March 2016) and comprises a membership of 758 businesses. The key objective of the Sligo BID is to develop and implement a series of initiatives (agreed by the members) that are designed to promote and improve the trading environment and to drive footfall to the BID zone. The work of the Sligo BID has already engendered positive results. Sligo won a Purple Flag from the Association of Town and City Management in 2015. Purple Flag is an international accreditation for town centres in the evening and at night from 5pm to 5am. Purple Flag destinations distinguish themselves by being vibrant and well-managed. Other achievements of the Sligo Bid include:

- Highly commended award from the Association of Town and City Management (ATCM UK and Ireland) for the strength of the town team partnership (2016) and;
- Certified as the first designated coach friendly town in Ireland from the Coach, Tourism, Transport Council of Ireland (CTTC), February 2017.

4 CONCLUSION

The new National Planning Framework (NPF) must learn from the failings of its predecessor the NSS. The NPF must drive real Balanced Regional Development (BRD) to rebalance Ireland and move away from the all growth in Dublin scenario. Currently Dublin is attracting an unsustainable level of investment, jobs and growth to the detriment to the rest of the country. The NPF must identify the 5 regional settlements – Cork, Waterford, Limerick, Galway and Sligo for accelerated and targeted major employment and population growth to counterbalance the primacy of Dublin.

Plans for growth in the five regional settlements should be developed concurrently with capital works investment programmes to ensure that infrastructure such as transport, water, power, education, healthcare and housing is available to facilitate growth and build sustainable communities.

A new NPF which focuses growth in a more limited number of growth locations will build critical mass in the regional settlements. These settlements will drive a regional network of thriving towns and communities delivering sustainable regional growth. The new NPF must clearly set out this strategy with clear objectives and policies which will facilitate the desired outcomes. The primacy of the 'first tier' settlements must be entrenched in the framework from the outset.

While the NPF can set out a strategy and the associated policies and objectives, it is ultimately the regional and local development plan policies which will determine outcomes on the ground. The structure and implementation of local and regional development plan policies and objectives must not be permitted to run contrary to the overall strategy set out in the NPF. Similarly, the zoning designations associated with these development plans and the decisions on individual planning applications must, first and foremost, accord with the provisions of the NPF. This will facilitate a shift from developer-led planning to plan-led planning. The primacy of the NPF, in the planning hierarchy, should be enshrined both legislatively and practically to prevent development management outcomes that run contrary to the NPF and which will only serve to undermine it.

