

## Wicklow County Council

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

31 March 2017

**Re: Submission to the National Planning Framework on behalf of Wicklow County Council**

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Dear Minister,

Set out to follow is Wicklow County Council's submission to the National Planning Framework – phase 1 public consultation. This submission is in two parts – part one addresses a number of key issues of relevance to County Wicklow in the NPF, which are the issues that have been emerging and will be a concern into the future in Co. Wicklow. The second part is a synopsis of the views expressed by the elected members of Wicklow County Council when this matter was raised for their input at the Council meeting in March 2017, which they have asked me to convey to you.

Given the strategic level of the NPF and the preliminary nature of this consultation, it is challenging to know how exactly to frame or pitch this submission, but in the main it is concentrated on strategic issues affecting the **Greater Dublin Region** and **Wicklow**.

I hope that all of the points and views set out will be taken into consideration in the crafting of the new National Planning Framework.

Is mise le meas,

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Bryan Doyle  
Chief Executive  
Wicklow County Council

## PART 1

### Topic 1: HOUSING

#### 1.1 Accurate characterisation of Dublin growth and use of accurate data

What has been described as the unsustainable or uncontrolled 'sprawl' of housing out of Dublin needs to be correctly characterised and understood. The peripheral counties of Wicklow, Kildare, Meath and Fingal have, since 1999 (in accordance with the first regional plan – the Strategic Planning Guidelines for the GDA) been working hard to coalesce development in designated centres identified for such growth.

Looking at the growth rates between 2002 and 2011 (as set out in the table below), it is clear that a large proportion of population growth in these 4 counties has occurred in the towns that have been designated for such growth in the regional plans since 2002. Growth has been occurring in the locations where the local authorities *have been instructed to let it occur*. These locations were selected based on spatial planning, infrastructure and environmental sustainability criteria. It is disingenuous to now suggest that the pattern of growth that has emerged is somehow unacceptable and must be halted. What is needed now is in-depth analysis of the patterns that have emerged, establishing the factors that have led to this pattern and understanding why 'success' and 'failure' occurred. Only then can we learn lessons and avoid any perceived 'mistakes' and develop a new strategy that built on previous success.

2002-2011	Total population growth	Growth rate	Population growth in designated growth towns	% of total growth occurring in growth towns	Growth towns
<b>Fingal</b>	77,578	39%	53,164	68.5%	Blanchardstown, Swords, balbriggan, Lusk, Rush, Donabate
<b>Kildare</b>	45,368	28%	25,838	57%	Naas, Newbridge, Leixlip, Maynooth, Celbridge, Kildare, Monasterevin, Kilcullen, Athy
<b>Meath</b>	50,130	37%	27,750	55%	Navan, Kells, Trim, Ashbourne, Dunshaughlin, Dunboyne, Drogheda
<b>Wicklow</b>	21,964	19%	15,220	69%	Bray, Greystones, Wicklow, Arklow, Newtownmountkennedy, Blessington.

For example, we clearly need to ask why development in some designated towns has not in fact been higher, and indeed why the proportion of growth in the designated growth settlements in some counties has perhaps been too low<sup>1</sup>.

In locations where a significant proportion of the population growth in the county during the 2002-2011 period actually occurred in towns not designated for growth in the regional plan, we need to ask - why did this occur? If this is because of 'poor' planning decisions, one must ask why a development strategy that did not accord with the regional plan was allow to proceed; why the regional authority

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<sup>1</sup> The current regional plan generally required c. 70% of all growth to be directed into growth towns

and the Minister did not intervene in the formulation of this strategy and why the Board did not refuse permission where the development did not accord with the regional plan and / or Core Strategy? The solution to this perhaps unacceptable form of development is not to tar all development in the Dublin hinterland with the same brush, decide that 'hinterland growth' in general must be somehow stemmed, but rather to address the structural and system failures that allowed this type of growth to occur in these locations.

If however the problem is that there simply was not enough serviced land in the designated growth towns and serviced / more cheaply serviceable lands in these other towns, we need to look very carefully at our investment decision process.

With respect to Wicklow, while growth in the designated towns has been strong (accounting for c. 70% of all growth), this figure could have been higher, only for lack of infrastructure. For example, growth has been particularly curtailed in Arklow and Blessington due to lack of wastewater treatment infrastructure, which is still unresolved. The lack of any significant growth in Bray is simply due to the lack of land in the town (which is bounded on 3 sides by the sea, the county boundary and Bray Head SAAO). Long standing plans to expand the town to the west have been stymied by the lack of investment in roads and public transport infrastructure in this area. Furthermore, the relevant roads and transport agencies would appear to consider the development of these areas to be unfavourable or premature (notwithstanding the fact this is strategy has been endorsed by the Minister and the regional authority for more than 15 years).

One result of a lack of investment in infrastructure in designated towns, is the growth of housing in towns not designated for significant growth but having the capacity (normally in terms of water and wastewater capacity) to grow; as well as ongoing demand for one-off rural housing.

The reality is that some of these towns did not have the road infrastructure and public transport capacity to grow, but this in the past was not seem as a 'restricting factor', and the transport agencies did not normally stand in the way of such development (particularly in Kildare, Meath and further afield in Wexford and Laois). The result now however is traffic emanating from locations where perhaps the road network is not capable of accepting the loads. This congestion issue is being used a stick to beat the counties immediately surrounding Dublin, and as purported 'evidence' that growth should be stemmed in the Dublin hinterland counties, notwithstanding the fact that the drivers are emanating from towns that were either designated for such growth or were allowed to grow.

## **1.2 New housing locations**

The issues paper identifies that there will be a need for 500,000 new homes up to 2040. Given Dublin's primacy as the largest population centre and hive of economic activity on the island, and notwithstanding the desire for significant growth our second tier of cities, one must assume that at least 25% of the housing growth should occur in Dublin. The key factor here is how one defines 'Dublin'. Clearly there will not be capacity to delivery 125,000+ housing units within the canals or indeed within the M50. The new strategy should consider the existing 'satellite' towns around Dublin, beyond the M50, as being suitable to accommodate a significant portion of this growth, albeit to an appropriate scale depending on the location, connectivity etc of each location. Cognisance should also

be taken of the considerable investment in infrastructure that has occurred in some of the satellite settlements and to not allow further growth of housing in same would undermine this investment and not be a sustainable use of scarce resources (see Section 1.3 to follow).

The strategy for the Dublin region should include in the first instance densification of the area inside the M50, thereafter followed by significant and intense growth in the satellite towns either directly adjoining the M50 or in very close proximity, such as Swords, Blanchardstown, Lucan, Tallaght and Bray. It should be a priority to invest significantly in these towns in terms of transport, water and social infrastructure, as well as directing employment agencies to prioritise these locations.

There is likely to be a residual additional demand for housing in the Dublin region even after the areas described above are targeted. Housing growth should therefore be promoted in a number of key settlements, not more than 30km from Dublin centre, such as Balbriggan, Maynooth, Naas and Greystones. These locations should be selected on the basis of very clear criteria, including the existing availability of or potential to provide water and transport infrastructure, strong community and social assets such as schools, sports clubs etc so as to be fit to absorb new population and have either significant existing or the capacity to attract significant new employment.

It is acknowledged that the decision about the 'growth' status of various settlements outside of the M50 is likely to be made at the regional level. However the NPF should set the criteria for the town selection / categorisation that will be fairly applied across the region and not be susceptible to political negotiation.

### **1.3 Sweating the assets**

Significant investment has occurred in many towns in the Greater Dublin Area, including the 'hinterland' towns. In depth analysis is required of the 'spare capacity' for growth now available in these locations. This assessment should focus on water – wastewater capacity in the first instance, as it is very likely that a 'roads – transport' assessment will turn up a 'no capacity' result for all locations.

Where pre-existing designated growth towns with / about to have spare water capacity are identified, further work is then required regarding the roads and transportation enhancements that are required to support further development in these locations. It is accepted that funding would not be available for 'top of the range' motorway connections, high speed rail and regular high quality feeder and long distance bus routes for every town, but a clear priority list for roads and transportation investment must be established (which the transport agencies must sign up to and implement), based on growth potential that could be realised.

In the case of Wicklow, the two metropolitan area growth towns of Bray and Greystones have no issues with water – wastewater capacity but their capacity to grow is now hampered by lack of investment in the N/M11 and in public transport. The N/M11 northbound in the morning is already congested before it even reaches Greystones. The rail line is only a single track. There are no road based public transport services to the M50 ring, where much of the region's employment is located. The investment decisions to date of TII and the NTA do not support the growth strategy that has been

adopted for these towns, which is in accordance with the Regional Plan and has been endorsed by the Minister.

Similarly, significant investment has been made in water – wastewater services in Wicklow Town and is about to be made in Arklow. This investment has been made on the basis of (a) serving existing populations, (b) protecting the environment and (c) providing capacity for growth. There is a train line and major motorway serving these towns. However, without major investment in public transport and employment in these locations, employees will leave every day to travel to Dublin on the N11, thus exacerbating the congestion further north. If this is to be avoided and the new framework will somehow restrict / curtail such growth, this investment will be wasted.

#### **1.4 Role of 'suburbia'**

People like living in suburbia; it fulfils their desire for a family home outside of a dense city, where parks and playgrounds abound, schools are close by and accessible. Properly designed, it has the capacity to provide a healthy lifestyle (that is not completely car dependent as it is currently characterised) as there is usually space to provide for a wide range of recreational and community facilities, to build cycleways and footpaths, to create new and enliven older communities. The current rhetoric surrounding the NPF review is 'suburbia = bad'; 'city centre living = good'. There is a role for both and both forms of living should be accepted as being part of the future housing mix.

However, the key draw-back of suburban living is long commutes to the centres of employment. The development of employment opportunities is the desired solution to this dilemma. However, a more realistic alternative and one that the state can directly address is investment in public transport infrastructure; not in an indiscriminate way where every town or village gets a train line or tram or even a high frequency bus service but **invest significantly in the best locations**, where the most people are already located and where more localised services can connect to. Such locations should also service as transport hubs for those who by necessity need to do a part of their journey by car. However it is essential that the transport services emanating from these hubs serve a variety of locations, not just Dublin city centre, but M50 ring locations, or indeed any location that data indicates are major attractors of employees from the outer suburbs.

We should be careful however to not negate the factors which make suburban satellites attractive; the possibility of a detached or semi detached home, ample parks and sports grounds etc. If we densify too much in these towns or change the use of land from parks to high density housing, we lose the essence of these places and they no longer become an 'alternative' - everywhere becomes the same and we are not genuinely providing for the different housing needs of all in our society.

We need to think carefully about our densities, land uses and land take and what we are forgoing by allowing housing development on greenfield lands. The trade off between housing and food production needs to be carefully considered and we need genuine facts regarding how it would affect our environment and economy to allow say 5,000 hectares of land to be devoted to new housing at densities around 50/ha, compared to 12,500 ha at densities of 20/ha (typical suburban density). We must also consider that there is little demand for 50/ha type housing development (which requires over 60% of housing units to be apartments, rather than houses) in suburban locations. The NPF

should set out clear criteria for numbers types and formats of housing that is to be promoted in each of the different types of settlement identified for growth in the framework and this should be realistic and provide housing formats that people want to live in.

## **Topic 2: TRANSPORT**

### **2.1 Strategic transport networks**

The key to a planning framework in any region, but particularly the Dublin region, is the adequacy of our transport system. Enhancing public transport, particularly rail and light rail services, requires very significant investment and therefore a very long term view must be taken as returns will accrue over long period. If this really is a plan for 2040, we need to start asking what transport will look like in 25 years time. Will we still be driving cars at all? Will we need the current road infrastructure? Will we be using only driverless cars that can be programmed to free flow efficiently thereby avoiding congestion and traffic jams? Will we each own a car or just summon one to our homes when needed? What form will public transport take? If we are serious about solving our commuting and traffic congestion issues, we need to have some serious foresight into what the future might hold, we need to be ready for technological changes.

We should start considering that by 2040 one lane of all major motorways should be devoted solely to public transport in whatever form that might take in the future. In order to achieve this we must envisage the future, and take 5-year steps back in time to today to establish what steps we must take in the next 5 years and the following 5 years and so on. For example, within the next 5 years we could plan to devote one lane on all motorways to carpool only vehicles. Similarly, we need to dedicate road space to public transport vehicles only. We need to attract users onto public transport that can flow past single occupant cars on congested inside lanes. This is particularly needed TODAY on the M50, which is a major draw for employees both from within and outside the M50, but there is no way to travel around it without using the private car.

Significant investment in heavy and light rail is essential to future growth and movement in our country. The capacity issues on the Dublin – Rosslare railway line presented by the single track arrangement south of Bray should be addressed without delay.

### **2.2 Local transport**

Outside of the main cities, transport needs are met almost exclusively by the private car. If we are serious as a community about reducing car dependency, we need to ensure that public transport options are available for shorter distance trips, such as journeys within and between towns and villages in the hinterland of cities. We need to make smaller towns and villages more sustainable, to both support the communities already residing there but also to make them more attractive for those desiring a rural lifestyle, as this will aid in the reduction of unsustainable rural housing patterns, which are contributing to the unsupportable, dispersed demand for rural services.

### **Topic 3: EMPLOYMENT**

#### **3.1 Employment locations**

The 'flip side' of improving the public transport system significantly is to attract employment (the main generator of road trips) out to the locations where people **already live** and create self sufficient and sustaining communities. By locating more employment say in the satellite towns of Swords, Blanchardstown, Lucan, Tallaght and Bray we can reduce transport demand into the city centre, capture those currently travelling from further afield before they get to the M50 and also create reverse commuting patterns thereby freeing up road space.

It is acknowledged that Dublin is currently the primary employment centre for the country and the GDA. There are certain industries, such as international financial services and new technology / design and social media etc, that are attracted to city centres to ensure economies of scale and to be close to a large pool of talent, or talent that wants to live in a vibrant city culture. It is not suggested that there should be an attempt to disperse these industries or attract them to move to outer counties. However, there are many other sectors that are not dependent on city locations, and these should be identified and supported to locate in the major satellite towns in the first instance, and secondary hinterland towns thereafter. In particular, small to medium sized, indigenous businesses are likely to be more attracted to such locations, rather than large multinationals. In order for this to happen, a framework needs to be put in place that:

- Provides for and encourages zoning and servicing of suitable lands close to the designated towns;
- Provides for and encourages the growth of housing and community infrastructure in such locations, essential requirements to attract employers into new locations;
- Provides supports **and funding** for local authorities and employment agencies to develop 'ready to go' sites and buildings in these locations.

#### **3.2 Employment in Wicklow**

Wicklow should not be viewed solely as a 'dormitory' or commuter area for Dublin. While it is acknowledged that County Wicklow offers ample recreational opportunities for the residents of and visitors to Dublin, it should not be viewed as 'Dublin's playground', or just a nice place to live while working in Dublin. Wicklow, along with similar counties surrounding cities, has its own attributes and assets and the NPF must provide a framework for each county to develop to its own potential based on its assets and strengths, which are more extensive than its proximity to or connection with the city.

Allowing such potential to be realised can also bring benefits to the proximate city; for example, a significant growth in employment in a county like Wicklow can bring the major benefit of reduced traffic flows into the city centre and onto the M50, thereby improving the efficiency of the traffic networks, particularly the road network. This would not diminish the overall level of economic activity in the **city region**, but instead allow the city region to operate more effectively, and attract new employers who know they are not heading to a city region strangled by traffic deadlock.

Wicklow has intrinsic employment attracting qualities such as:

- It is a sophisticated, modern and well developed County, strategically located in the Greater Dublin Area; access to the M50, Dublin Airport, Euro Route E01 (N11) Belfast to Rosslare, national motorways, major ports, and Dublin City; the west of the county served by the N81 allowing access to the city centre; modern water and waste water facilities; excellent telecommunications and internet infrastructure;
- Established sea shipping industry - Arklow and Wicklow Ports;
- Highly skilled and educated workforce, large pool of talent; Wicklow County Campus, centre of excellence in education and enterprise: strong partnership with IT Carlow; close proximity to universities and third level institutions;
- Substantial areas of serviced zoned land available for business development; wide range of existing and developing modern business parks; strong and long established business community and business networks; strong co-ordinated business supports available;
- Strong creative and cultural industry sector; established film industry sector;
- Thriving tourism industry/Ireland's Ancient East; strong Marine, Agriculture and Forestry resources; availability of natural, historic, heritage, recreational and cultural assets; green image;
- Strong and vibrant settlements within the County; coastal county, blue flag beaches; unique quality of life; first class indoor and outdoor recreational facilities;
- Interagency structure in place to encourage social and economic development; strong population growth; high youth cohort; vibrant and innovative community groups and strong volunteer activity.

The new framework should ensure that the employment potential of Wicklow will be supported and not considered a threat to the economic supremacy and vitality of Dublin City.

In particular, the framework should ensure that possible impediments to significant employment development in Wicklow are addressed, such as traffic congestion on the N11/M11/M50 bottleneck; lack of public transport infrastructure and connectivity outside of the east coast growth towns; water and wastewater constraints in certain settlements and the ongoing development of new or expansion of existing large scale out of centre retail parks around the M50 which impact on retail development in the centres of designated growth towns, contributing towards vacancy and dereliction. Wicklow's harbours and two commercial ports have significant potential for development and growth, with resultant economic and tourism benefits. The national strategy on ports and harbours gives priority to Tier 1 and 2 ports and no particular plan for such regional ports – this is at variance with European Strategy.



#### **Topic 4: COORDINATION**

It is critical that the infrastructure delivery agencies all work to the same goals as the NPF. At the moment, while a lot has been said about the NSS not being fit for purpose, we do have a national plan, which is given regional expression in the current regional strategies, which are then translated to the local level through County Development Plans. We therefore have an overall development strategy for the regions and for each county, which have been through an approval process via the regional authority and the Department of Housing, Planning, Community and Local Government. What should have followed from the regional plan were the roads and transportation strategies from the NTA and TII, and water – wastewater investment strategy (from the Department initially and IW later) which accorded with and supported the strategy laid out in the regional plan.

Instead, in 2011 the NTA drew up a draft strategy but never finalised it and subsequently in 2016, 6 years after the adoption of the current GDA regional plan, a GDA transport strategy was adopted. Firstly, it clearly was much too late; secondly and more importantly, it did not fully support the development strategy laid out in the regional plan. For example, the train line to Navan, the only major growth town in Meath was shelved. The Luas to Bray in Wicklow was put on the long finger. The DART enhancement proposals were inadequate and would have in fact resulted in a worse service to Greystones. The heavy rail proposals were vague.

With respect to national road infrastructure in Wicklow, 18 years after the first regional plan which designated Bray and Greystones for significant growth, the process of assessment of the N/M11 in the northern part of the County has only commenced in earnest this year. The initial draft documents of this study have omitted any reference to (a) the Wicklow Core Strategy and its associated population growth targets for the settlements in the north of the County, (b) the major new development planned for the designated metropolitan expansion area of Fassaroe in Bray.

Irish Water similarly does not appear to be aligning their investment plans for the regional plan or Core Strategies.

This cannot be allowed to continue. It makes a mockery of any planning strategy that the infrastructure agencies can have independent strategies as they do now. The NPF must include a clear commitment that all agencies will work together and will review their strategies, as Councils may have to with respect to development plans, to comply with and deliver on the goals and objectives of the NPF.

Once any development strategy is agreed and approved by the Minister (via the development plan process), the infrastructure agencies should be compelled, (within a reasonably short timeframe), to work with the relevant local authorities to draw up an implementation plan to give effect to the adopted strategy. It simply should not be open to a single infrastructure agency to stand in the way of, or delay the implementation, any agreed development strategy, but rather all agencies should be part of the strategy development process, and where the Minister or indeed the regional assembly endorses a particular development strategy, notwithstanding any reservation or objections any infrastructure agency might have, all parties need to thereafter get on the job of implementing that strategy.

**Topic 5: NESTED PLANNING**

The opportunity should be taken in the crafting of the amendment to the Planning Act (to take account of the new NPF) to bring in a system of 'nested' and chronological planning, whereby a regional plan flows from a national plan and a county plan thereafter flows from the regional plan. One should follow the other and if one is delayed, the plan below should remain in place until a new higher level plan is made.

The current Wicklow County Development Plan was adopted in 2016. A new regional plan, which should have been prepared in 2016, will most likely not be in place until 2018-2019. Undoubtedly the next regional plan will require amendments / updates to the Wicklow county plan. Following this variation process, any changes would not therefore be in place until 2019-2020 i.e. around the time a full review of the plan will be due to occur anyway. It is suggested that for this cycle, all County plans should remain in place until the new RSES is made and once the new RSES is made, all county plans in the region should commence their 2 year process of putting in place a new plan. Thereafter county plan should only commence review on adoption of a new RSES.

## **PART 2: VIEWS EXPRESSED BY ELECTED MEMBERS**

### **CLLR JOE BEHAN**

#### **Spatial framework**

- There is a need to rebalance growth levels around the Country.
- Taking a long term view, in which a united Ireland is a possibility, the 'all island' approach to the framework is welcomed.
- A new 'capital' is required for the possible United Ireland scenario – Dublin should remain the commercial capital with government and administrative functions relocated to a new central location serving the whole island, such as Athlone.

#### **Infrastructure**

- With respect to investment in infrastructure, the framework must ensure that infrastructure is provided in the locations where the population is currently located, as well as the locations where future growth is planned.
- In particular, while housing growth has occurred in the counties around the periphery of Dublin, this was not matched with adequate investment in transport and employment generating initiatives. It is not sufficient for such investment to occur only in Dublin itself on the basis that Dublin is the service hub for the region.
- The framework should include the provision of the 'Leinster Outer Orbital Route' from Navan, through Naas and on to west and south Wicklow.

#### **Implementation**

- The long term approach being taken in welcomed, as is that fact that this framework will require Oireachtas approval.

### **CLLR STEVEN MATTHEWS**

#### **Spatial framework**

- There needs to be continued investment in Dublin as it is the economic engine that will supplement and provide for funding for investment in the other population centres.

#### **Housing & employment**

- In the last 5 years, 45% of our housing has been one-off houses – development should be directed into towns, to halt decline.

#### **Environment**

- Climate change should be at the core of the new framework; issues such as flood risk require more attention and for example, we need to look at much larger set backs from rivers.
- We need to maximise the potential for renewable energy sources, need to reduce dependency on fossil fuels.
- Food security will become an issue in the future.

#### **Infrastructure**

- We need to move away from private car use towards mass transit, walking and cycling

## **CLLR VINCENT BLAKE**

### **Spatial framework**

- Dublin's inner city requires significant regeneration and repopulation.
- Other cities should be brought up to 100,000.

### **Housing & employment**

- Major shortfall in employment outside of Dublin.

## **CLLR DEREK MITCHELL**

### **Spatial framework**

- Development in centres outside of the east coast, such as Cork and Limerick will divert essential investment required in the Dublin region, particularly investment in road and public transport infrastructure.
- The current doughnut pattern of growth around Dublin should be addressed; more growth is required in the centre of Dublin.

### **Housing & employment**

- The framework should address the poor jobs ratio in the counties surrounding Dublin, and the development of additional houses in these counties should be dependent on the provision of employment and roads investment.

### **Infrastructure**

- The framework should address investment in the rail network.

## **CLLR GERRY WALSH**

### **Infrastructure**

- Funding in broadband essential.
- Traffic issues on radial routes out of Dublin such as the N11 should be addressed.

### **Community development**

- Need social and community supports for the over 65s.

### **Implementation**

- 5 year review is very important
- New resources and powers need to be given to Councillors
- All agency approach welcomed.
- Need evidence based approach.

## **CLLR OLIVER O'BRIEN**

### **Implementation**

- A short term plan is needed to address current problems such as housing and children's services, before we can genuinely plan for the future.

## **CLLR MICHAEL O'CONNOR**

### **Spatial framework**

- The difficulties being experienced in Dublin clearly indicate that more balanced regional development is required. The idea of establishing a new capital city to serve a united Ireland is supported.
- Need to move state services out of Dublin but we need to learn the lessons for the last failed round of decentralisation.

## **CLLR PAT VANCE**

### **Spatial framework**

- The size and influence of Dublin should be seen as a national asset and developed further.

### **Housing & employment**

- More housing is required to be built in Dublin – the GDA has depended too long on the other counties for housing; too much priority has been placed on employment development in Dublin and as a result the peripheral counties are highly dependent on Dublin.
- Employment needs on the east coast are different for the midlands and the west and a tailored approach is required.

### **Implementation**

- NSS was a disaster because it was politically driven; gateways were competing with each other; it wasn't properly funded.
- The process being followed to adopt this new framework is very short and it is unclear that all the measures and mechanisms will be in place to ensure that it will be properly implemented.
- In particular, the transport delivery agencies must align their investment priorities with the new framework, as they have not aligned with higher level plans in the past (e.g. Luas to Bray, investment in mainline rail).
- The framework must be statutorily based and the transport agencies must be legally required to comply with same.

## **CLLR CHRISTOPHER FOX**

### **Plan chronology**

- Once the NPF is made, a change in legislation should set out a review process for regional and county plans, so that into the future, each flows for the level above in chronological order.

#### **CLLR JAMES RUTTLE**

##### **Spatial framework**

- Athlone should be prioritised for significant development as a regional pole for Roscommon, Longford etc

##### **Housing & employment**

- The right of rural people to live in the countryside must be supported; must maintain rural communities

#### **CLLR TOM FORTUNE**

##### **Plan chronology**

- Illogical to have a national plan being prepared after county plans.