

**From:** Gerry Warnock <gwarnock@longfordcoco.ie>  
**Sent:** 27 October 2017 15:58  
**To:** National Planning Framework  
**Subject:** Submission on Draft NPF  
**Attachments:** Submission on Draft NPF - Cllr Gerry Warnock.pdf

A Chairde,

Please consider the attached submission.

Kind Regards

Cllr Gerry Warnock  
Longford Municipal District  
Longford County Council  
Tel: 087 966 3562  
Facebook: **Gerry Warnock**  
[gwarnock@longfordcoco.ie](mailto:gwarnock@longfordcoco.ie)

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# Submission on Draft National Planning Framework (NPF) – Ireland 2040 Document

**By Councillor Gerry Warnock – Longford MD, Longford County Council**

## Regional Balance

I do not believe that Regional balance has been achieved in the “4 Regional Cities” proposition.

The Southern Region seems to be the principal beneficiary of this proposal with three out of the four proposed locations.

It appears at a glance that the objective is to strengthen the Southern Region to rival the influence of Dublin and the surrounding dependant counties (Louth, Meath, Kildare & Wicklow).

One has to wonder if this is a strategy based on regional/economic balance or is it a decision that is politically motivated!

What is apparent is a gaping hole encompassing the entire Midlands area and the Northern & Western Region with Galway being the only location designated a Regional City.

I purposely omitted mention of what is termed the Eastern & Midland Region as I do not believe that the peripheral counties of Longford, Westmeath, Offaly & Laois (Former Midland Region) are comparable to the Eastern Counties of Louth, Meath, Kildare and Wicklow whose economic and social development are contingent on a thriving Dublin.

The four peripheral counties are not an equal beneficiary of a prosperous Dublin and I thoroughly believe that these counties should be treated as a separate entity (Region) in terms of national focus for investment and stimulation of economic growth.

I have grave concerns that the economic strength of Dublin and the Eastern Counties creates a false narrative that the level of prosperity and growth is consistent throughout the Eastern & Midland Region when in fact there is a distinct “Two Tier” Economy within the Region.

A simple indicator of the divide is the difference in property prices between the Eastern and Midland counties.

Property prices are consistently used as a barometer to measure economic activity in an area.

To further illustrate this point I refer to the distribution of the Local Property Tax.

The Local Property Tax Equalisation Fund redistributes funds to Local Authorities which do not have a sufficient property tax base to generate sufficient funding for its services.

The Midland Counties are principal beneficiaries of the Equalisation Fund to the tune of €21.6m in 2017.

In contrast Dublin and the Eastern Counties contributed in excess of €50m towards Equalisation in 2017.

In light of the above and in order to achieve 'actual' Regional Balance I believe that there is a compelling argument for focal points within the former Midlands Region and the Northwest.

The Draft NPF defines a city according to the EU/OECD definition of a settlement around a core centre with a population more than 50,000 people. I think that sticking hard and fast to this definition is restrictive given the geographical location of our traditional large settlements, which are all coastal locations with many contained within the Eastern and Southern Regions; while urban development in Midlands and Northern & Western Region are defined by smaller settlements (mainly large and small towns) in traditional rural areas.

In my view it is impossible to achieve balance unless special consideration is given to the latter grouping.

I am proposing that Athlone and Sligo are given special designation due to their strategic locations as "Strategic Settlements" that would attain parity in terms of focus and level of development and growth with the four proposed Regional Cities.

Such a measure would go a long way in redressing an obvious omission in any goal to achieve balance within the Regions.

### **Projected Growth and Investment (Large Towns >10k)**

The proposed document outlines a strategy that links job creation with projected population growth. I have no objection with that per say, but I do question the projected population growth of 20-25% in the Large Towns category.

Using Longford Town as an example:

After Census 2006 the population of Longford Town (Longford Urban 1; Longford Urban 2; Longford Rural) was 7,622.

Census 2016 saw this rise to 10,008 which represents a population increase of 31% in Ten Years.

According to the projections outlined in The Draft, it is envisaged that the population of Longford Town in 2040 will be somewhere in the region of 12,000 – 12,500 people.

Based on the actual run rate I believe that these projections are severely understated and I have major concerns given the fact that national economic stimulation programmes and job creation opportunities are linked to a flawed projection and that Large Towns, such as Longford, may not receive an appropriate level of focus in accordance with actual population growth as outlined!

## **The Future Standing of Local Government and Local Democracy**

Since the publication of the 'Putting People First' document back in 2012 and the subsequent enactment of The Local Government (Reform) Act 2014 there has been quite a lot of speculation pertaining to the future of Local Government in Ireland and in particular to the future of Local Democracy.

The 2014 Act at 'the sweep of a pen' removed the sub-county, or Town Council layer of Local Government that had served the people of 80 Towns throughout Ireland for over one hundred years.

This move which pushed local decision making even more towards centralisation was completely against OECD norms and happened without any meaningful public consultation or dialogue.

Unfortunately the language used in this Draft does nothing to allay concerns regarding the future of Local Government. It certainly seems that there is continuity of the objectives of 'Putting People First' which in my opinion is pushing towards the objective of Regional Governance with what they define as 'empowered' (non-statutory) community groups assisted by a Local Administration without the layer of a local democratically elected statutory body which is accountable to the people and charged to hold the executive both locally and nationally to account.

The rapid programme of local authority mergers which immediately followed the enactment of the LGRA 2014 has set a precedent and established a framework for the process of regionalisation.

This hypothesis has been given further credence following recent revelations on the disclosure of an FOI request into the 2015 Cork Local Government Review process, where it appears that senior official(s) from within the Department attempted to influence the decision making role of the CLGR Committee with a pro-merger narrative to counter some of the opposing arguments, which could be interpreted as affecting the independence of the process

(<http://www.irishexaminer.com/viewpoints/analysis/special-report-documents-reveal-how-senior-officials-prepared-pro-merger-information-459620.html>)

**“Just because you're paranoid doesn't mean they aren't after you.”**

— **Joseph Heller, Catch-22**

I firmly believe that if we do not raise the issue or seek clarity during the consultation process, we may be letting a "Trojan Horse" into the Sector as it is clear from the Draft that the Final Document and its objectives will receive legislative backing and then it gets complicated.

**ENDS.**