



**Congress Submission  
to the Department of Housing, Planning &  
Local Government**

**Draft National Planning Framework –  
Ireland 2040 Our Plan**

**Irish Congress of Trade Unions  
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## Introduction

The problem about a national planning framework is that by suggesting it in the first place there is an inherent assumption that it is necessary. For reasons that we will explain, we do not disagree with this conclusion. However, we are concerned that by reaching the conclusion first i.e. 'we need such a strategy' there is a danger of structuring public policy to meet the conclusion rather than addressing the objectives that should have been identified first, after which a strategy can be devised. The chief focus of the proposed strategy is to re-orient resources away from the greater Dublin area. However, no attempt is made to analyse how this would benefit the majority of citizens. There is an assumption that such a strategy will produce a good outcome, without a serious 'pro' and 'con' analysis. To pursue the attainment of a conclusion without having regard to the considerations that led to that conclusion creates the real possibility of mis-steps with potential detrimental impact on citizens.

Therefore, while the ICTU agrees with this focus in the strategy, we believe that there is a need for a much clearer analysis of what advantages could be gained or lost by not pursuing this proposed national planning framework; by identifying the positive effects against which such a framework should be measured and against which progress, or lack thereof, can be evaluated.

In a sense, therefore, the ICTU is concerned that the framework starts at the end rather than at the beginning. If public policy is geared to achieve ends that are predetermined without reference to the identified needs of citizens, the risk is always that we will see wrong decisions and decisions that, even if apparently in tune with citizens' needs, have unforeseen impacts. Given the influence of the Enlightenment on public policy, it is worth reminding ourselves of John Stuart Mills' utilitarian philosophy that 'happiness is the only end'. Every policy should be a means to that end. The State cannot guarantee happiness but, to continue the Enlightenment reference, it is the function of a State, as per Locke and Jefferson, to facilitate citizens in making the best decisions that result in the best life possible

If, as most people would accept, that is the purpose of the State, the question is not 'should we have a national planning framework?' but, rather, 'what are the important things for ordinary citizens to give them a decent and rewarding life?' We would suggest that the following rank high on any person's list;

- A home
- Decent, well paid employment
- Good accessible public services such as income support, (where necessary), health and education, (the latter is of value, in itself, and in terms of improving living standards)
- Environment - physical environment, good transport facilities etc.
- Community – including family and neighbours

A national policy strategy, we would suggest, should be measured against each of these priorities. No doubt others will suggest different priorities and the list is not exhaustive but we feel that sometimes 'priorities' are, in fact, suggested means rather than 'ends'. For example, a heading in the framework is 'Strengthening Ireland's rural fabric'. Its inclusion suggests an acceptance that public policy should gear itself to this 'achievement'. Undoubtedly, having more people living in rural areas creates positives for community, physical environment and it would probably help to ensure that people have decent homes. On the other hand, it is, undeniably, easier to secure decent well paid employment in urban areas, accessibility of public services improves with a more urbanised population and transport links are easier to provide. This is a good example of the confusion of 'ends' and 'means' in the framework. We would prefer if the framework identified the advantages

and disadvantages, in this case of maintaining and/or enhancing rural populations. No matter what policy is pursued, people will exercise their right to live in particular places. In the case of those who choose to live in rural areas, the advantages can be identified e.g. people might be encouraged to live in healthier physical environments but to pretend that this can co-exist with easy access to public services, for example, is fundamentally dishonest. The truth is that citizens know this but a pretence is maintained that policies can be delivered that, somehow, will overcome the disadvantageous aspects of rural living.

In case this, in any way, appears to suggest an attack on rural life, it is worth observing that telling people it will be possible to provide homes for everybody in urban settings that match the advantages of the physical environment of the countryside is, equally, as hypocritical.

A degree of honesty is required. If policy is geared principally to increased urbanisation, and the suggestion of alternative 'hubs' to Dublin is precisely that, then the depopulation of rural areas will continue. Furthermore, the transport headaches of major urban centres experienced by Dublin, in particular, currently, will be replicated in the newly expanded hubs unless there is detailed advance planning. A framework that does not address these facts or does so vaguely is a pointless exercise.

This returns us to the point that policy should be judged against the sort of considerations that we set out above rather than in the expression of meaningless pieties.

What follows are our thoughts on a physical planning strategy measured against the important considerations that are, in our view, necessary prerequisites to secure the wellbeing and happiness of our citizens.

## Providing Citizens with Homes

The ongoing failure of the state to engage directly in the building of homes for citizens is the largest obstacle to resolution of the crisis in this provision. The continued exclusive reliance on the private sector condemns many of our citizens to the unnecessary and unforgivable circumstance of homelessness.

The question, therefore, in the context of a national planning framework, is what contribution can such a framework provide, if any, to improving the situation regarding the provision of homes. It is, therefore, disappointing that the summary, 'What success looks like', makes no explicit reference to the provision of homes and makes no direct attempt to relate the framework to this objective. There is recognition in the framework that significantly more homes will need to be built and there is a suggestion that enabling the cities of Cork, Limerick, Galway and Waterford to grow by more than twice as much up to 2040 as they did in the 25 years up to 2016, will have a positive effect in meeting this need. However, in terms of meeting housing needs, no clear explanation is given as to why this objective of development in cities outside Dublin is better or worse than a corresponding growth in the Dublin area.

The suggestion of using infill, brownfield and publicly owned sites is welcome but it is not related to any vision of improved provision of housing nor is there any specific policy suggestions for tackling the issue of vacant properties.

Land opportunities are more likely to be available in less developed urban areas than in an over-developed city such as Dublin, where the availability of such opportunities will, inevitably, be less and, therefore, in conjunction with a vigorous strategy of identification of suitable infill, brownfield and publicly owned sites, the greater availability of usable development land in urban centres

outside Dublin seems to us to present much greater capacity to address the undersupply of housing and we feel that the framework could have provided a stronger case on this basis for the expansion of the identified urban centres and the relief of pressures on the Dublin area.

It is axiomatic also that it ought to be much easier to meet housing needs in the small towns that the framework identifies as requiring a strengthening of their urban structure. However, this cannot be planned in isolation, as the framework recognises, and any such development is dependent on inward investment into those towns, so that jobs are available for citizens locally.

If meeting housing needs in smaller cities is easier rather than in Dublin and in towns rather than cities then it follows that the ready availability of land in the countryside ought to make it easier again. The framework states as an objective '..... a special focus on activating the potential for the renewal and development of small towns and villages'. This is highly laudable but the only specific policy recommendation designed to achieve this is objective 17b that speaks of the provision of vital services such as water to provide the necessary infrastructure. The decline of small towns has many factors that will not be reversed simply by the provision of infrastructure. It might, for instance, make more sense to relate the potential development of some small towns that are adjacent to the cities identified for significant development as a priority rather than adopt a 'one size fits all' approach. We have seen in the Dublin area, in particular, that urban expansion has consequences for surrounding smaller, urban centres.

If, as seems logical, it is easier to meet housing needs in less populated areas, it is not clear why it is proposed that 'one off' housing in such areas should be subject to the requirement to show a demonstrable economic need to live there. This additional barrier will serve to discourage rural living. The impact will be to push more and more people into living in urban areas. This might be of value in easing access to public services and employment opportunities but it comes at a price for community and for the provision of cheaper housing.

As a general observation, it would be useful if a planning framework drew some attention to the possibilities that might be provided through land value taxes.

## **Securing Decent Well Paid Employment**

Public policy has, for many years, been geared towards maximising the distribution of foreign direct investment (FDI) across the country. Whether this is necessarily the best means of maximising the overall economic impact of such investment is a discussion for another day in another context. What is clear is that the IDA has been very successful in distributing jobs across the country, although there is an inevitable draw to the greater Dublin area. If the primary planning objective is to develop alternative hubs to Dublin, the focus has to be on attracting investment into the four smaller urban centres identified in the framework. A degree of honesty is required in identifying this as a priority, as opposed to offering a little bit of everything for everyone. Alternatively, it is difficult to foresee any impetus towards the expansion of these urban centres. The framework shies away from a firm conclusion in respect of this matter and, by so doing, risks the real possibility that a central policy objective will have no means of being made to happen. The framework posits suggestions that will have an indirect consequence of attracting investment to the four non Dublin locations, such as enhancing third level institutions. However, one of the few direct suggestions related to employment creation in these locations is the creation of a Science park in Cork. Therefore, it is not clear from the framework how the demand to live in the locations specified can be generated.

Of course, FDI is not the only 'driver' of economic development. The enhanced development of our indigenous food industry presents great, additional opportunities, particularly in the south of the country where land is good and the potential to use quality raw materials to generate significant value added is at its greatest. However, the failure of the framework to recognise this with regard to the cities in that region or to suggest ways to harness this available resource to maximise opportunity is a strange failing in a set of proposals that suggests the development of nearby urban hubs.

If it is the case that there is a settled view of the value of developing alternative urban centres to Dublin, as the framework suggests, then it is incumbent on those making such a suggestion to be clear in setting out the steps required to achieve that value. There is a serious gap in the framework in its failure to engage with this question to any significant degree. Interestingly, in contrast, the proposals for Dublin contain two objectives that will generate the potential for further employment opportunities for the capital i.e. development of Dublin Port and determining accessible locations for people intensive employment.

It is interesting, and welcome, that the framework does address the issue of employment creation in rural areas with a number of specific and clear sighted recommendations including a recognition of the value of a further enhanced food sector. This section of the framework reflects a thought out approach that is considerably clearer than that evident in respect of the proposed alternative urban hubs. The emphasis on development related to agriculture, aquaculture and tourism is the correct one, in our view. It is worth noting, however, that this approach is not without difficulties. The hospitality industry is notorious for low pay and poor working conditions. It provides employment, as a result, that is often part-time, seasonal and transitory and rarely does it provide lifelong opportunities of the sort that will encourage young people to remain in the industry and, as a consequence, in the locality. An over reliance on that industry to provide employment is never going to halt or slow down the exodus of young people from the countryside.

This, in turn, reflects a more general point that is often overlooked in policy formation. It is not the provision of employment alone that generates demand from people to live in a particular place. Well paid, rewarding, interesting jobs provided by employers willing to treat employees with respect will act as a magnet for people to live in a particular area.

Therefore, if a physical planning issue is under consideration, a question to be asked has to be 'How can we provide the sort of employment that will attract people to stay?' We suggest that the framework, where it addresses the issue of employment creation at all, does so with insufficient attention to this aspect. All of that said, we recognise that an ever increasing concentration of employment opportunities in an area creates overheating in that area and generates under development elsewhere and that an integrated planning approach that distributes employment opportunities across wider areas has beneficial social consequences. Clearly, FDI decision makers require certain assurances regarding a ready pool of skilled labour that mean they often gravitate to urban locations, in some cases these locations might also represent significant markets. With proper planning, it should be possible to devise an industrial strategy that makes the four smaller cities sufficiently attractive for those decision makers, provided other factors, such as quality public services, good physical environment and transport links can be put in place. Therefore, in terms of maximising quality employment opportunities, we think that the idea of developing four smaller cities is a good one.

## Public Services

There is no simple answer to the question of what level of accessible public services should a citizen be entitled to expect. It is self-evident, for instance, that only a certain number of third-level educational institutions is required, so there cannot be one in every significant town. Likewise, there are signs of an increasing policy belief in the value to be had from greater centralisation of health provision. The difficulty, however, is that inevitably, a concentration of resources creates access problems and we end up, for instance, with no cancer treatment centre of excellence north of a line from Dublin to Galway.

We are surprised that very little specific analysis or, indeed, reference to, the implications for public services of a national framework is contained in the proposals. It seems to us that a frank recognition of the impact on accessibility to such services for citizens who chose to live away from major urban centres is warranted yet not once in Chapter 4 of the framework is this referenced.

This is an oversight that relates not just to issues of quality of life but has implications for the potential to attract investment to create employment etc.

In a national planning framework, it seems to us that it is necessary to explore all of these issues in greater detail. A section of Chapter 4 refers to planning and investment to support job creation. However, the crucial question of whether, for example, inward investment can be attracted to rural areas if certain public services are located elsewhere is not discussed. This leads us to the view that the analysis of what is required to strengthen the 'rural fabric' is incomplete.

That is not an issue that arises in respect of the non Dublin cities targeted in the framework for development. Each of them has adequate hospital and university provision and they have also, as a result, large populations of well-educated people likely to be attractive to inward investors as a ready pool of skilled labour. However, a national planning framework that has as one of its core objectives the development of cities outside the capital needs to pay some attention to the detail of what educational disciplines are available in what third-level institutions and how these might be harnessed to attract the sort of investment and job creation that can, in turn, act as a driver for the demand for the sort of development that the framework envisages. That said, in a general sense, there ought to be no difficulties in utilising the availability of public services in the non Dublin cities to create the conditions that will allow the sort of development that the framework suggests is desirable in those cities.

## Environment, Including Transport

People who choose to live in rural areas will cite the undeniable virtues of the physical environment, cleaner air and open space. In terms of attracting investment, these are virtues that can be pitted against the benefits of urban locations discussed above. However, there is one undeniable fact that requires attention and that is the inadequacy of public transport links right across the island. In a rural context, public transport is, to a large extent, non-existent for most people. In practice, to link back to the point about public services, citizens who live in rural areas often have to drive long distances for hospital appointments etc. If we are serious about maintaining a significant rural population, this issue has to be addressed, yet it is not referred to anywhere in the framework.

For those people for whom it is possible to do so, driving in rural Ireland is a much safer and comfortable proposition than heretofore as our roads have improved. However, the framework makes no reference to this or to the development of public transport links.

In the case of Dublin, in particular, but also to a lesser extent our other cities, transport has become a considerably worse problem. Interestingly, the framework's vision for development in Dublin makes no reference to the problem. Nor does the framework make any reference to the recent commentary about Dublin's lack of high end office space, which must be a significant factor, (if it is true), in the ability of the city to develop further.

There are surprising omissions. We are not competent to judge if the commentary regarding office space is valid or not. However, anybody who lives in Dublin will testify that the constant traffic gridlock is one of the least attractive features of the city. Even if there were no plans to develop opportunities in the city, this issue requires attention. There is no plan in contemplation currently that will come anywhere remotely near addressing this major difficulty for the citizens of, and visitors to, our capital city. The pending development of the Luas network will improve matters along only two corridors from the south and south west of the city to the north-west. The north-south corridor of the DART is catered for adequately. All other travellers are required to utilise buses that have to compete for space with private cars, (which are used in such numbers that roads are unable to cope at peak times), or to use private cars. The consequence of people living within a few kilometres of the city centre spending two to three hours per day commuting is a result of ridiculously poor planning. This framework should have been an opportunity to address this.

The transport/traffic issue is not referred to at all in respect of the non Dublin cities designated for development. Yet, if this issue is not made an integral part of any development plans, the same scale of problem experienced in Dublin will be replicated.

The issue of transport needs to be put at the heart of planning. The aim of any such plan should be to provide quick, clean and efficient mass transit systems that are not forced to share space with private cars. This involves a mix of rail, light rail and bus only routes into and out of the centre of major urban hubs. It probably requires extensive 'park and ride' facilities. Above all, it cries out for the sort of public investment that has been consistently withheld to date.

On the wider issue of the environment, the framework is surprisingly light on the challenges that face us. One has to go to the chapter on island and marine potential to find specific suggested actions to cope the challenge of climate change. While the recommendations made in this context are worthy, this issue has to be faced more generally. Our planet is changing and this poses such a range of potential consequences that every effort at future planning has to regard it as the central issue to be taken into account. A planning process that fails to address the need to reduce the use of fossil fuels is not only a cause for concern, it is a process of devising a plan while overlooking the central aspect that could throw that plan out of kilter completely. Every single chapter of a planning framework needs to analyse the potential consequences of climate change; needs to suggest strategies to lessen the risks and needs to be honest. For example, we observed above that our roads infrastructure has improved. However, almost all travellers are reliant currently on fossil fuels to utilise this improved network. This will not continue and planning needs to take account of this.

We have no unique insight into the environmental consequences of climate change nor have we any specific policy to suggest to take account of these consequences. However, we are surprised at the lack of attention to the issue in the framework and we believe that it is a flaw in the proposals.



## Community

The value of community is incapable of clear definition but we know that people tend to be happiest when surrounded by the support of family, friends and neighbours. Ahead even of the value of physical environment, it is likely that most rural dwellers will cite community as the chief value of living in the countryside or in small towns or villages.

The larger the urban centre, the greater the potential for tenuous community linkages. Nor is it possible to create 'community' by artificial device. What is possible is that poor planning can impact on the sense of community.

There is nothing of significance in Chapter 5, with which we would disagree to any great extent. It is well thought out. We have observed already that there are deficiencies, in our view, regarding the provisions covering housing policy. However, that is more a criticism of a lack of specificity in respect of policy implementation than of the sentiments underlining the proposals.

## Conclusion

The aspirations of the framework are, in our view, generally worthy. Our observations are focused on the lack of statement of clear operational policies to give effect to those aspirations.

We understand that, for example, this is not a set of proposals for a housing strategy. However, statements of intention regarding housing, worthy as they are, have limited value in a national planning document, without reference to the means of implementing the objectives.

We would also favour a different approach to the analysis of planning needs to focus on the factors that give potential for a happier life for citizens and to measure suggested policy approaches and implementation analysis against those factors.

We have suggested five headings against which to undertake this exercise.

Having done so, for our own part, we find much to commend in the framework. However, we see this as a 'first draft' of headline intentions that needs to be advanced by a significantly enhanced level of detailed implementation. If this is done then the framework can come to be viewed as a major, positive, first step towards a better planned future up to 2040.

We feel that all planning propositions put forward by any arm of the State need to put climate change at the heart of consideration. We are entering an unpredictable phase in human history. By definition, unpredictability makes planning more difficult and renders outcomes more uncertain. That is not an excuse for not trying, it is simply a central challenge to be identified and for which specific policy responses are required.