

Submission to the Draft National Planning Framework

From Dick Gleeson , Trinity Haus

The structure and layout of the document is excellent and is well supported by clear and attractive graphics. The emphasis on urbanism and the general reflective thrust of the document on valuing place-making is also very welcome. The language of the opening sections rightly places the spatial challenge within the broader dimension of an economic, environmental and social framework. It is particularly welcome that the overall vision rests on a broad platform of values, including opportunity, choice, quality, creativity , connectivity, collaboration, self-reliance and commitment. The strategic thinking relating to quantum on employment and housing requirements provides a more supportive and sustainable framework for the spatial objectives of population increase.

While acknowledging the extensive work gone in to the preparation of the NPF draft, I have some concerns. It is difficult to see how the broad population allocation across the three main regions was arrived at, and there seems to be a very slight evidence base to support this. It would have been helpful to see the recent historical population increase of each of the 5 cities and also the 41 towns indicated to have a population of more than 10,000. It would also have been useful to see how other countries compare in setting policies for towns which sit within the region of their capital cities. The use of the three big regions as a central vehicle for allocating the 1 million population increase is relatively crude as it masks the disproportionate negative impact which the draft NPF would have on some of the 41 towns. The NPF rightly refers to Ireland's weak urban structure, and sets out to address this issue. The use of the 3 regions has some curious consequences, and may even damage the existing urban structure. The SR region has 3 of the 5 major cities, Cork, Limerick, Waterford, where each of the three has a projected population increase of 50-60% to 2040. The EMR region on the other hand has only one of the 5 cities, admittedly the capital . However population increase in Dublin/suburbs is restricted to 20-25%. In addition to this restriction, the large towns in Leinster are also generally restricted to 20-25%. The implications of all of this is that the cities and towns of the SR region are being given the opportunity to greatly strengthen their urban structure, especially as the ambition for a 50-60% increase in the 3 cities is unlikely to be met, thereby providing increased allocation to the other SR towns. This is likely to have a reverse impact in the EMR region where the ambition of large towns may be seriously restricted, despite a lot of encouraging language in the draft NPF about reclaiming our urban heritage. Dublin as the only international large scale city in the Republic is likely to exceed the allocation of 20-25%, and this will impact on the global allocation for the EMR region. [In my experience, major capital cities in the EU take care to ensure that the competitive edge of their key city is protected.] In the EMR region there are significant urban centres of more than 10,000. These include the county towns of Dundalk, Navan, Mullingar, Longford, Tullamore, Portlaoise, Naas, and Wicklow, but also include very large urban centres like Athlone and Drogheda. While the NPF refers to the need to consolidate and regenerate urban centres, there is little reference to the role of the county town. Most of the towns in the list above have suffered from

urban sprawl from Dublin for decades, but there is now an opportunity to repair a damaged legacy, reimagine the role of the county town, and consolidate and create a sustainable base across economic, social, and environmental grounds. It is accepted that as the NPF states, not all of the towns will need to grow at the same rate, but the envisaged rate of 20-25% is worrying, especially, for example, for towns like Naas and Navan both of which sit outside the metropolitan footprint, but have a close working relationship with the capital.

Taking Naas as an example, the town has in the region of 12000 jobs which constitutes a sustainable counterpoint to Dublin. Within this figure there is a net inward flow of 4000 commuters over the outward flow. While the town, like many urban centres, has suffered decline in the core, an arc of peripheral development has grown around the motorway inter-changes. With the statutory support of an LAP, the town is exploring how best to heal the rift between the periphery and the core. A range of new infrastructure including a new rail station, motorway upgrade and a Business Park[Millenium Park] currently with 3000 jobs[including 1000 high level research jobs in Kerry plc] and capacity for 8000 jobs, will enable Naas to meet the difficult challenge of job provision and in so doing strike a sustainable balance between livelihood and livability. On the residential provision, development went very quiet during the years of the recession, but most sites zoned under the current LAP are being actively developed by half a dozen major developers in order to meet current demand. The consequence of this current activity is that the 20-25 % increase in population is likely to be achieved in the next 4-5 years alone, leaving aside the 2040 timescale. Naas meets each of the urban criteria set out in the NPF which will guide allocation under the RSES , and is particularly well placed in terms of strategic infrastructure to respond in a sustainable manner to significant population increase.

The worry is that the RSES will fail to acknowledge the potential of Naas or align with the town's ambition to renew and develop its role as a County Town and exploit the sustainable infrastructural base that is being provided through National investment. It is of course hoped that the political membership of the RSES will share the urban sensibility and ambition which underpins the NPF, however one could not have confidence that this will be so.

One of the issues that clouds the role and performance of the RSES is that there are no maps provided in the NPF which might refine the 3 regions to some degree. Certain references are not clear, e.g. the term 'Dublin and suburbs', and it is surprising there is no reference to Fingal, South County, or D& RD.

In the NPF overall, there is a huge emphasis on the provision of road infrastructure, and little in terms of rail provision. With the costly provision of new motorways, one would have at least expected the inclusion of the DART underground interconnector to Heuston. No mention is made of whether high-speed rail to Limerick was considered, or whether such a radical move would have proven a more cost effective intervention , instead of motorways, in creating a real counterpoint to Dublin. Also considering the critical importance of how cities strive to build partnership and network even across country boundaries, it is surprising that Belfast does not feature as a city, nor are the network of northern towns analysed as part of Ireland's urban structure.

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