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Sent: 08 November 2017 17:07
To: National Planning Framework
Subject: Submission to National Planning Framework (1581) 171104

Niall Cussen

Date : 4th November '17

Chief Planner

Ref : 17-1581

Department of Housing, Planning & Local Government

Re : Submission to National Planning Framework

Dear Mr. Cussen,

I will preface my submission by referring to my e-mail (17-1544) of 26th October which sought an extension of the date for submissions to Friday, 24th November. While I would like to express my gratitude for the extension until the 10th November I remain strongly of the view that insufficient time has been given for considered responses on the draft.

I stated my reasons for seeking the extension as follows.

Substantial nature of the draft document

Need to study the contents in detail

Requirement for meetings with other elected representatives

Time required to formulate submissions

Implications nationally/regionally/locally

My understanding from the initial Issues and Choices and from the draft National Planning Framework is that the latter will be underpinned by legislation and financially

through a 10 year National Investment Plan. Therefore more studied consideration was required than the time-frame permits. Certainly, I hope that when the consultative process for the Regional Spatial & Economic Strategies is announced more time will be allowed for formulating the inputs to them.

I note that Kilkenny County Council will respond to the draft on an objective by objective basis and that I have made my contribution to the Council's critique of the draft National Planning Framework and to the submission made by the Piltown Municipal District Council.

Therefore I would like to make the following comments and observations separate to the above.

- 1 I referred in my previous submission to Section 1.1.6 of Issues and Choices and the question that needs to be asked at the outset of the National Planning Framework process is what the vision should be.

**What sort of place should Ireland be in 2040 and
what do we need to achieve this?**

There was a recurring reference to place – the development of Ireland as a place, place based aspect to public policy, quality of life through place making, vibrancy of places and place based leadership.

The draft National Planning Framework seems to have made a clear differentiation between the importance of place in different parts of the country. This differentiation is due to an emphasis on an urban, ordinal and hierarchical approach focused on the five big urban centres with seemingly lesser regard and ambition for other areas of the country.

The approach is to scale up these larger urban areas, admittedly at rates which allow for higher growth rates outside of Dublin.

It will be difficult for areas not within the sphere of influence of the larger centres to feel part of the ambition for the country as a whole.

There are many counties without direct links to the large urban centres and many will feel that the National Planning Framework treats them as subsidiary to the national ambition and thus their sense of place where they live and work is diminished.

Also the relationship between each of the named five urban centres and its hinterland including other urban settlements is not explored nor is there a full examination of intra regional dynamics and each cities role as primary centres within each region.

Nor is there any exploration of the intra regional dynamic in parts of the country outside the wider areas of the five named cities. The approach does not recognise that other towns/cities might have the potential to become regional cities in their own right where local ambition is matched with harnessed resources and investment.

- 2 Our identities are greatly influenced by our sense of place. This is a major determinant of our sense of county identity and the integrity of our county boundaries should be safeguarded within the National Planning Framework especially as its originating vision is based on place.
- 3 I note that Chapter 1 includes ‘Collaboration’ as part of the vision for Ireland 2040. The vision for Ireland in 2040 is for a collaborative society in which our cities, towns, counties and regions engage in new partnerships

that benefit people, communities and businesses both locally and internationally. Its inclusion as part of the vision 2040 is to be welcomed.

In my submission (Ref: 17-414) of 14th March I referred to the collaborative approach taken by the Piltown Municipal District Council as evidenced by the joint meetings with Tramore & Waterford West Municipal District, New Ross Municipal District and Carrick-on-Suir Municipal District Councils. This model of working together has yielded tangible progress for individuals and communities living within all the municipal areas.

The exercise of this collaborative approach could be replicated in other authorities where there is a need for inter local authority cooperation to achieve the objectives sought under the National Planning Framework.

- 4 The elements of place, identity and collaboration could be brought together to give real regional focus to the National Planning Framework. The setting up of the 8 regional authorities in 1994 had the potential to develop this focus. People have a sense of identity and a sense of place which evolved over 20 years. They can identify with their region.

Certainly that was the case in the South East and the disestablishment of the Regional Authority in 2014 was a step that I regret. It is imperative that within the National Planning Framework recognition is given to the sense of regional identity which has been retained.

The regional assembly areas as currently constituted do not have the elements of place and identity referred to above and while they could have an oversight and monitoring role their configuration does not lend itself to driving regional

development to its fullest potential.

Kilkenny is part of the Southern Regional Assembly area. The latter is composed of three old regional authority areas, structures based on the 1994 configuration, including the South East, Mid-West and the South West. They are still retained as planning areas within the Southern Region.

The role of the planning areas should be developed taking into account their different characteristics and strategic issues so that the objectives and implementation measures of the National Planning Framework at sub-regional level can be achieved and delivered. The development could include planning and also have an administrative and representative dimension.

In the case of the South East it could input into the Regional Spatial and Economic Plan with measures strategically dovetailed to the needs of Carlow, Kilkenny, South Tipperary, Waterford and Wexford. These counties could together retain NUTS III status for EU Programmes and bring other initiatives such as the South East Action Plan for Jobs within its remit.

Likewise the other two planning areas with the Southern Region

I would be of the view that new sub-regional entities based on the planning areas within the Southern Region should be established as a prelude to the public consultative process on the Regional Spatial & Economic Strategy.

The strategies developed at sub-regional level (3) could be incorporated into an overarching and overall strategy for the Southern Region. Such strategies then could act as a bridge between national policy and local implementation by the constituent local authorities in a consistent and coherent manner. Thus priorities

could be addressed through the optimum use of funding from the National Investment Plan.

There are already self-evident priorities which demand a regional approach in the South East including a University for the South East, proper connectivity with the Mid-West, West and with the South West and, high speed broadband.

- 5 A similar approach could be pursued in the other three Regional Assembly areas and this would enable all parts of the country to share in the vision of the National Planning Framework, allow them to work with regional strengths and have a more inclusive approach which would elicit more support than a strategy built primarily on accessible centres of scale.

- 6 A focused South East regional entity could accommodate and coordinate more appropriately the Metropolitan Area Strategic Plan for Waterford as proposed in Section 9.2. Clarity on representation, role and extent of the Metropolitan Area Plan is required as quickly as possible for it was stated on many occasions that the issue of a boundary extension into Kilkenny by Waterford City & County Council would be determined in the context of the National Planning Framework.

It will be obvious from the above that my view is that the existing boundary should be left in place and clarity to this effect should endure henceforth.

Thank you for your attention to the above. I look forward to hearing from you.

Yours faithfully

Tomás Breathnach

