

8th November 2017

*For the attention of:*

**Mr. Eoghan Murphy TD, Minister for Housing Planning and Local Government**  
**Mr. Damien English TD, Minister of State for Housing and Urban Development**  
**Mr. Niall Cussen, Principal Adviser Planning, Department of Housing Planning and Local Government**

A Chara,

Longford County Council welcomes the opportunity to comment on the Draft National Planning Framework (NPF) issued by your Department in September of this year and to highlight the concerns felt about the adverse impact the proposals in the document will have on County Longford and the Midlands. A copy of Longford County Council's submission is attached. We have also included in our submission some suggested textual changes and proposed wording for various objectives which may assist in the final drafting of the document.

Longford County Council recognises the need to develop a balanced strategy for the future development of Ireland. However the focus on developing regional cities along the south and west coast, as a counter balance to growth in the Dublin region would leave Longford, in the middle of Ireland, with no defined role. We recognise that the NPF sets the vision for Ireland 2040 and outlines the Government's proposed long term strategic framework. However Ireland 2040 will ultimately set the framework for the future development of County Development and Local Area Plans and through this set the boundaries in which Planning Authorities must operate. Could the focus on coastal cities result in a 'horse shoe' effect in regional development? Is there a risk that in 2040, the North West and counties in a central belt, running through the Country, from Cavan to Tipperary will suffer the same fate as experienced under previous Frameworks and the Government will yet again face the challenge of addressing imbalance in regional development?

Longford County Council strongly recommends that the National Planning Framework process provides for a "**Health Check**" through which the concepts and objectives are field tested and the true impact on regions, counties, cities and rural towns and villages are assessed. In this way Government can ensure that the potential for Longford and similar Midland counties can be fully realised through the plan.

Having considered the current draft, Longford County Council is concerned that there are conflicts with current National Strategies including Housing Action Plan, Action Plan for Rural Development and Action Plan for Jobs. Is there a risk that these important strategies, which have helped breathe life back in to rural counties, could be undermined or require revision to the detriment of regeneration and revitalisation in counties such as Longford?

*cont'd...*

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Longford County Council believes that a "**Midlands Sub Region**" of the Eastern Midlands Regional Assembly (EMRA) region should be given a special designation in the plan to counter balance the evidence based disparity between counties Laois, Longford, Offaly and Westmeath and the remaining counties in the EMRA region. There is also a need to designate Athlone as a city at this time and not wait for the proposal to emerge through the Regional Spatial and Economic Strategy.

Longford County Council is concerned that the restrictive population growth allocations outlined in the Draft NPF (25% for Longford Town and 15% for our remaining towns) will lead to stagnation in the social, economic and physical development of our county. Will this policy see counties like Longford continuing to see an aging population with young people migrating to the bright lights of the cities or counties within the hinterland of these cities? This needs to be addressed to reflect County Longford's potential to contribute to regional and national growth.

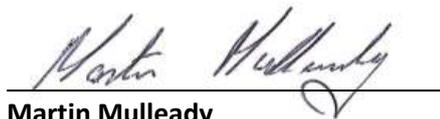
The link between employment growth and population growth referred to in the document will discriminate against County Longford and neighbouring counties in the Midlands Region. If this policy was in place in 2016, would County Longford have been able to attract the Center Parcs development which is now generating 750 construction jobs and will provide 1000 full time jobs when it opens in 2019? The links between population growth, employment growth and investment in infrastructure require a more imaginative approach so as not to deny County Longford the opportunity to attract a major flagship development in the future.

With regard to the provision of infrastructure, Longford County Council recommends that the NPF provides detail on the improvements planned for the N4 and the N5 and that a commitment be given to extending the Natural Gas Network to counties Longford, Roscommon, Leitrim and Sligo.

Longford County Council looks forward to our concerns being addressed in the final draft of the NPF which will allow our county perform to its full potential in the years ahead.

Is mise le meas,

Signed:



**Martin Mulleady**  
Cathaoirleach



**Paddy Mahon**  
Chief Executive

# Longford County Council

## *Draft National Planning Framework Submission*



**8<sup>th</sup> November 2017**



## SPECIFIC REQUIRED CHANGES TO TEXT OF DRAFT NPF DOCUMENT

**Justification for request:** When the Regional Strategy for the EMRA is prepared the Midland Towns such as Longford will receive a substantially smaller proportion of the 25% for Towns >10,000 and could go as low as 10 to 15% which would be unsustainable.

**Additions in red.**

**Deletions in blue.**

**Page 36** – In Section 2.4 which states that *‘future jobs growth would be geographically more distributed, but to a limited number of large and regionally distributed centres to include the north and west’*; either:

**a) include the ‘Midlands’**; or

**b) exclude the ‘north and west’**,

otherwise this is prejudicial towards future jobs growth in the Midlands.

**Page 37** – **Remove National Policy Objective 2a which states that ‘population and jobs growth will generally be aligned to occur within the same functional area...’**. This alignment will discriminate against the ‘Outer’ Midlands which is a sub region with a large commuting population to employment centres (Figure 2), located on the cusp of 2 regional assembly areas.

After National Policy Objective 2b include the following additional National Policy Objective:-

***‘The location and nature of peripheral counties from the five Cities will be recognised and addressed with key measures to address population and employment decline through the Regional Spatial and Economic Process’.***

**Page 39** – Table 2.1 the Eastern and Midland 2040 column should include additional text:-

***‘Growth of other towns to be determined on an equitable basis by Regional Spatial and Economic Strategies within overall National Framework’.***

Insert caveat to Table 2.1 that reflects the additional National Policy requested on page 37:-

***\*\*\*‘The location and nature of peripheral counties from the five Cities will be recognised and addressed with key measures to address population and employment decline through the Regional Spatial and Economic Process’.***

**Page 47** - Table 3.1 Ireland 2040; Targeted Pattern of City Population Growth needs to include **Athlone and Sligo**.

**Page 48** - In paragraph 2 the following additional text should be included:-

*‘Within both the Eastern and Midland and Southern Regional Assembly areas, overall targeted population growth for large towns with >10,000 population in 2016 should generally be 20-25%, which is ahead of projected national average growth. **It is recognised that the Midlands is a more peripheral and predominantly rural location further away from any City sphere of influence and therefore an overall targeted population growth for large towns with >10,000 population in 2016 shall be no less than 25%.** The purpose of this is to accommodate focussed and proportionate growth while preventing excessive levels of city generated overspill development in certain locations’.*

Under ‘3.6 Ireland’s Large Regional Towns’ after the 4<sup>th</sup> paragraph include additional text:-

***‘The Regional Spatial and Economic Strategies must recognise that in relation to counties located along assembly boundaries, a flexible approach which is cognisant of both assembly regions must be taken to the application of growth targets’.***

**Page 65** - The following additional objective should be included:-

**National Policy Objective 14b**

*‘Ensure that the targeted population growth of Ireland’s towns >1,500 in the Midlands shall be no less than the targeted rate of 15% in the Regional Assembly area, to be applied regionally through the Regional Spatial and Economic Strategy process and locally through County Development Plans’.*

**Page 68** – National Policy Objective 18b in relation to rural housing is too restrictive and should make provision for inclusion of demonstration of *‘social’* need to live in a rural area and not just economic reasons.

**Remove the requirement to carry out a HNSA for rural housing as part of the core strategy preparation.** It is an onerous task contrary to rural revitalisation.

**Page 71** - The paragraph on *‘Tourism’* should include the following sentence:-

*‘Key Flagship developments which will give rise to considerable employment benefits to the region will be encouraged’.*

**Center Parcs** should be included as a successful case study.

Insert 2 no. additional objectives:-

**National Policy Objective 21b**

*‘Support and promote the development of sustainable and green Tourism in Rural Areas to deliver real social and economic benefits to rural areas’.*

**National Policy Objective 21b**

*‘Support and promote the development of a National greenway network through Ireland to support sustainable transport and tourism related benefits’.*

**Page 77** - **Remove the Hierarchy of Settlements and Related Infrastructure diagram.** This hierarchy could be used by Government Departments as a decision making tool for infrastructure investment. It is factually incorrect, derived from an old source *‘Strategic Investment Board Limited, 2008’*, and very negatively discriminatory towards Rural Ireland and its small towns that serve much larger hinterlands than is recognised in CSO figures. In many cases the rural hinterland of these small towns contains much larger support populations. Granard in Longford, for instance, with a current population of 1,397 has a support population of 6,000 in the surrounding area and its economy and social service provision supports this larger population. We are very concerned with the inclusion of this chart as it may be used in the future by Government Departments and Agencies when determining eligibility for infrastructural investment.

**The reasoning for the specific changes are provided overleaf in the supporting submission.**

Longford County Council while acknowledging the work that went into the preparation of the draft National Planning Framework is nonetheless extremely disappointed that our comprehensive submission to the *'Issues and Choices'* paper has been largely ignored. Longford County Council wishes to raise in the strongest possible terms our concerns in relation to the following:-

**Draft NPF contrary to Current National and Regional Strategies**

- The ethos and detailed requirements of the following existing high level National and Regional Plans have not been enshrined for the 'Outer' Midlands Area in the draft NPF:-
  - *'Realising our Rural Potential'* – Action Plan for Rural Development;
  - *'Rebuilding Ireland'* – Action Plan for Housing and Homelessness;
  - *Action Plan for Jobs for the Midland Region*;
  - The Failte Ireland 4<sup>th</sup> tourism brand covering the greater Midland area.

Rather the draft NPF has adopted a contradictory approach to established Government policy which will contribute to and accelerate the stagnation of Rural Ireland as opposed to its regeneration and revitalisation, will lead to a drastic reduction in housing provision at a time of National crisis in the housing sector, and which does not take due cognisance of the recommended job targets for the 'Midland' region.

- Longford County Council strongly recommends that the National Planning Framework process undertakes a serious '**Health Check**' in advance of its adoption through which the concepts and objectives are field tested and the true impact on regions, counties, cities and rural towns and villages are assessed.

**Reinforcing Regional Imbalance**

- Many of the commitments in the *'Issues and Choices'* paper have not been sufficiently followed through, with particular reference to details on the roles, comparative strengths and direction of the regional areas, in particular the sub-regions.
- At a National level there is a need to develop a clearly defined and balanced strategy for the future development of all parts of Ireland. This document is not accomplishing this, but reinforcing and building upon the regional imbalances which the National Spatial Strategy created.
- The Southern Region seems to be the principal beneficiary; accommodating 3 out of the 4 regional city locations.
- The document is biased towards Dublin, the East and 4 no. regional growth centres on the periphery of the country. The Midlands has been left out of the equation completely and as such regional balance will not be achieved.
- The geographical location of our traditional large settlements are all coastal locations mainly within the Eastern and Southern Regions; by definition a coastal location is geographically limited in its catchment area to expand.
- The draft NPF defines a city according to a population of more than 50,000 people. This definition is far too restrictive. Urban development in the Midlands and Northern & Western Regions are defined by smaller settlements. It is impossible to achieve regional balance unless special consideration is given to the latter grouping.

**Future Role of Midland Region?**

- There is a large non economic zone proposed for the middle of Ireland with no future defined role. The statements in the *'Planning for Diverse Rural Places'* chapter are of little value, while introducing National Policy Objectives which will result in the further stagnation and decline of rural Ireland and its small towns and villages. There is a need to develop positive intervention strategies for those regions that have been clear '*losers*' over the last 40 years of national development.

- The key role of the EMRA defined ‘Midlands Region’ (Figure 1) to act as an economic and transport development zone supporting the National Economy is not recognised and supported in the NPF.
- The Midlands remains part of the NUTS II Region in terms of EU funding and therefore differs from the remainder of the EMRA. The peripheral counties of Longford, Westmeath, Offaly and Laois (‘Outer’ EMRA & former Midland Region) are not comparable to the eastern counties of Louth, Meath, Kildare and Wicklow, which are large economic and social beneficiaries of Dublin’s influence. The ‘Outer’ Midlands is in a location where it is falling between ‘two stools’ and is missing out to other beneficiaries. These ‘Outer Counties’ of Longford, Westmeath, Offaly and Laois (Figure 1) should be treated as a separate entity (Region) in terms of national focus for investment and stimulation of economic growth.
- The Midlands should be given a special ‘Midlands Sub Region’ designation in the NPF, with a defined regional growth centre, its own population and positively biased jobs allocation and commensurate funding in the National Investment Plan. A specific positively biased jobs growth target for the Midlands and investment through the National Investment Plan to assist same should be specifically provided for via a ‘designation’ for the Midlands Strategic Planning Area.

**Figure 1: Forgotten ‘Outer’ Counties of EMRA Region (Longford, Westmeath, Offaly and Laois)**

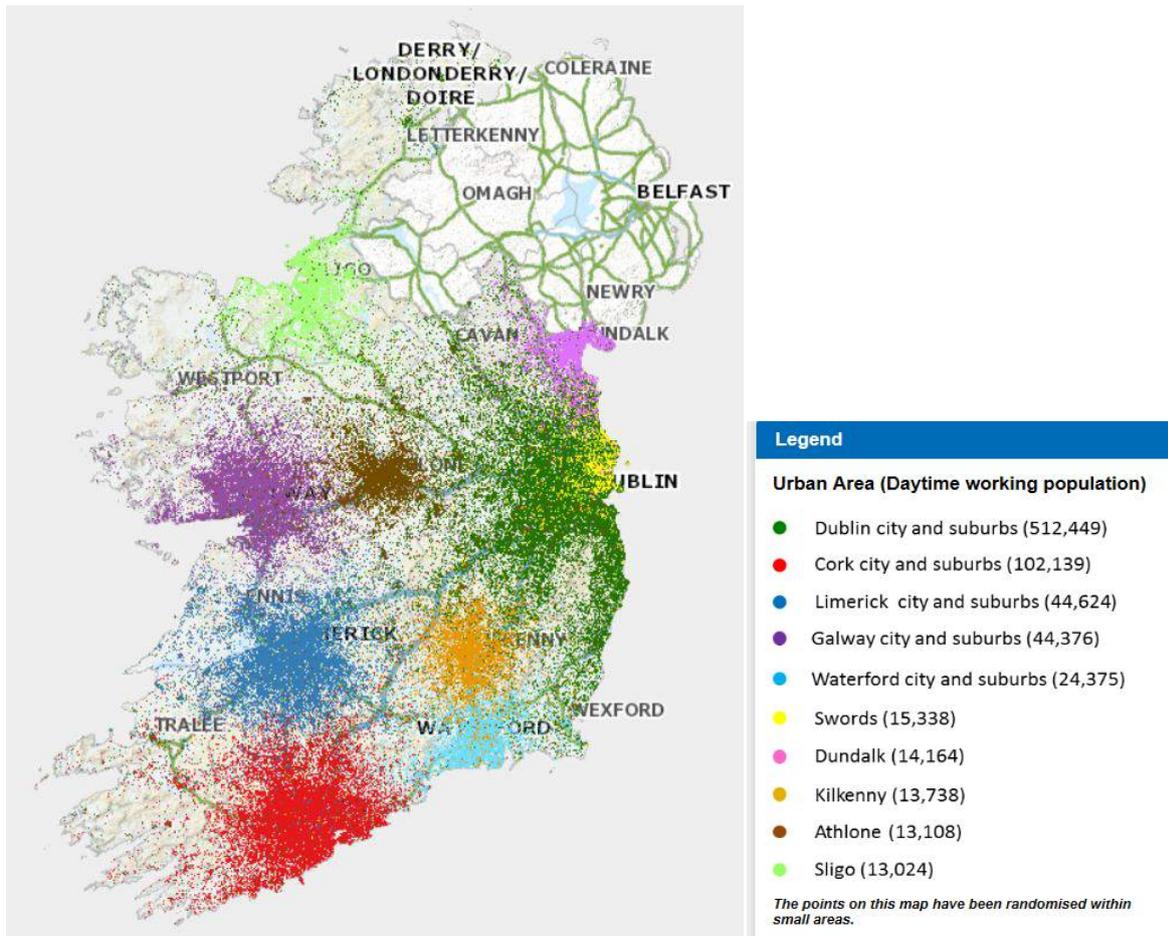


- The economic strength of Dublin and the Eastern counties creates a false narrative of the level of prosperity and growth in the EMRA Region, when in fact they present distinct ‘Two Tier’ economies as illustrated by the vast difference in property prices and the distribution of local property tax. The 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.

**Need for Additional Growth Centres in Midlands and Northwest**

- A central growth centre is needed, without which significant future potential and economic opportunity will be sucked out of the ‘Outer’ Midlands Region with consequent detrimental consequences in terms of facilities and quality of life issues for the population.
- Both Athlone and Sligo are identified in the Census 2016 figures as major settlements of workplace commutes. To leave Athlone and Sligo out of the regional city designation when it is demonstrated by CSO empirical evidence to have such a sphere of influence is a major lapse and must be rectified (Figure 2).

Figure 2: Catchment areas of major Workplace Locations, 2016 (CSO, 2016)



- Table 3.1 Ireland 2040; Targeted Pattern of City Population Growth needs to include Athlone and Sligo.
- **Athlone** must be identified as a Regional city in the Midlands and supported to develop as an alternative growth centre and counter-magnet to Dublin for the following reasons:-
  - It provides the only real alternative growth centre to Dublin as Waterford, Cork, Limerick and Galway are too far removed to realistically make a difference.
  - It currently performs as a significant regional urban centre and economic driver for this wider region that should be recognised for its potential to perform the role and function as a regional city.
  - It straddles the Roscommon/Westmeath county boundary on the regional interface of the NWRA and EMRA boundaries and has the potential to perform a role as a Regional city and alternative growth centre to support the weaker counties at the junction of the respective ‘Outer’ regional regions.
  - It will encourage the development of a ‘green belt’ which can enhance quality of life.
- **Sligo** performs as a significant regional urban centre and economic driver for the northwest region that should be recognised through its designation as a regional city.

#### Restrictive Population Growth Allocations

- The future population allocations expressed as percentage allocations are far too restrictive and overly prescriptive for a Strategic Plan and will limit potential growth unnecessarily and further accentuate regional imbalance.
- As the background data and associated population projection forecasting models are not available, it is not possible to form an informed view as to the robustness of the figures.

- Table 2.1 - clarity is required on the spatial extent of the area called ‘*Dublin City and its suburbs*’, with particular regard to its impact on population and job allocations to the remaining EMRA area.
- When the Regional Strategy for the EMRA is prepared the Midland Towns such as Longford will receive a substantially smaller proportion of the 25% for Towns >10,000 and could go as low as 10 to 15% which would be unsustainable.
- In the midst of a national housing crisis, it is unfathomable that a proposed National Strategy is being prepared which will result in the consequent de-zoning of large tracts of land in the region and will result in a serious waste of expensive existing infrastructural investment in these locations. The Draft NPF as proposed is directly contrary to current National Strategy ‘*Rebuilding Ireland*’ – Action Plan for Housing and Homelessness;
- The projected population growth of 20-25% in the EMRA ‘*Large Town*’ category is severely understated e.g. in Census 2006 the population of Longford town was 7,622 which rose in 2016 to 10,008 persons, a population increase of 31% in 10 years. According to the projections the 2040 population of Longford Town will only be in the region of 12,000-12,500 people (an increase of a mere 2,000 – 2,500 persons in 22 years). This equates to approximately 47 houses per annum for the County town of Longford, and is far too restrictive.
- The 15% population allocation for the rest of the towns in the county would equate to less than 18 houses per annum and would make house building economically unviable. Rural towns and villages which fall below the 10,000 threshold of ‘*Large Town*’ status and which are the lifeblood of rural Ireland will stagnate.
- It is unclear if the ‘Outer’ EMRA counties will in fact receive the percentages indicated when it comes to allocation within the RSES. Growth of towns must be determined on an equitable basis. It must be recognised that the ‘Outer’ Midlands is a more peripheral and predominantly rural location further away from any City sphere of influence and therefore the following must be included:-
  - Large towns with >10,000 population in 2016 - an overall targeted population growth shall be no less than 25%;
  - Towns >1,500 population in 2016 – an overall targeted population growth of no less than the targeted rate of 15% in the Regional Assembly area.
- The location and nature of peripheral counties from the five cities must be recognised and addressed with key measures to address population and employment decline. Rather than a strict enforcement of percentage allocations, a transitional buffer zone with a percentage figure which is transitional between the adjoining Regions should be adopted. This would help to limit the increase in regional disparity between competing ‘*large towns*’ in neighbouring but differing Regional Assembly areas.

### **Rural Housing**

- Longford County Council has serious concerns at the necessity for the core strategy of Development Plans to account for the demand for rural housing related to the HNDA model – this will prove both very difficult to implement by the local authority in terms of resource allocation, and will also be adversarial towards rural generated housing and associated rural regeneration.
- The loss of population in rural areas will be seriously detrimental to all rural areas in Ireland, waste the significant infrastructural investment in small towns, villages, local schools and shops, and will be contrary to other Government policy which favours the revitalisation of rural Areas as embodied in ‘*Realising our Rural Potential - Action Plan for Rural Development*’.
- The National Policy Objective 18b in relation to rural housing is too restrictive and should make provision for inclusion of demonstration of social need to live in a rural area and not just economic reasons.
- The carrying out of a HNDA for rural housing as part of the Development Plan preparation is an onerous task which is contrary to rural revitalisation and should be removed.

### Employment Growth

- Measures to address the national imbalance that has developed over the last 40 years by specifically and actively intervening and directing jobs, investment and infrastructure into the ‘Outer’ section of the EMRA region has not been provided.
- Jobs are to follow population at a rate of 0.66/1.0 (i.e. 666 jobs per 1,000 persons). The linking of job growth linked to employment growth needs further exploration and a ‘health check’ to determine the figure needed to sustain economic growth in the ‘Outer’ Midlands counties. The impact on existing companies, possible future expansion plans, sustainability of operation, ability to fill vacancies and possible restriction on economic growth must be considered.
- The national economic stimulation programmes and job creation opportunities are linked to flawed population projections. Consequently ‘Large towns’ may not receive an appropriate level of focus in accordance with actual population growth.
- The indication that the quantum of jobs allocation will be tied to population allocation is unacceptable as it will only increase economic disparity for low population towns, particularly in the Midlands Region.
- There is a serious risk that this strategy will adversely affect the decisions of companies to grow, expand and remain in the area, with consequent negative knock-on impacts in terms of maintaining population stability, provision of essential services and quality of life issues. This will perpetuate an ongoing cycle of decline for the Midland ‘Outer’ counties.
- There are concerns regarding section 2.4 which states that ‘*future jobs growth would be geographically more distributed, but to a limited number of large and regionally distributed centres to include the north and west*’; either a) include the ‘Midlands’; or b) exclude the ‘north and west’ as otherwise this is prejudicial towards future jobs growth in the Midlands.
- National Policy Objective 2a states that ‘*population and jobs growth will generally be aligned to occur within the same functional area...*’. This alignment will discriminate against the ‘Outer’ Midlands Region which is a sub region with a large commuting population to employment centres (Figure 2), located on the cusp of 2 regional assembly areas. This statement should be omitted.
- It should not matter if employment projections are surpassed as opportunities to deliver projects with significant employment potential must not be curtailed.
- The constraints of linking job allocation to population allocation will prohibit large flagship developments in lower population areas. For example if this were the policy in place at the time of the processing of the Center Parcs planning application, such a development would not have received the Government support and backing which it has.
- As demonstrated by the attraction of Center Parcs, there are a large number of environmental and economic factors that might lead to significant investment in rural counties with a low population base like Longford. The potential of the Apple data centre in Athenry is another example. Opportunities should not be lost due to limiting factors which this draft Strategy advocates.
- The NPF must specifically support the IDA approach of promoting a M4/N4 Economic Development Corridor from Dublin to Sligo through Longford.
- Agencies such as IDA and Enterprise Ireland have stated that locations with University status are essential if they are to deliver new investment for the region, therefore AIT must be designated as a University.
- Many of the ‘Outer’ Midlands towns already accommodate substantial commuter populations. The region enjoys considerable quality of life advantages, which are seriously compromised by long work commutes. It makes sense to invest in the Midlands to allow increased access to employment locally and to reduce long unsustainable commuter journeys.
- The draft NPF is directly contrary to the current Regional Strategy - ‘*Action Plan for Jobs for the Midland Region*’, which sets out much higher jobs targets for the Midlands than the reduced population allocation and resulting lower number of jobs proposed in the Draft NPF. The growth and expansion of existing industry in the Midlands will be restricted by the lack

of availability of workers in the future as a result of the restricted population allocations proposed in the Draft NPF.

### **Infrastructure Provision**

- The draft NPF fails to mitigate the legacy of underinvestment in the region north of the Dublin-Galway axis. The NPF must tackle the national imbalance that has developed over the last 40 years by specifically and actively intervening and directing infrastructural investment into the 'Outer' section of the EMRA Region. Improvements in critical infrastructure to open up the 'Outer' Midlands Region should be a top priority. It is not appropriate to leave these critical infrastructure projects to RESE stage.
- The draft NPF fails to identify the necessary investment in critical road infrastructure network to a Ten-T 'High Quality Road' standard or investment in other forms of lifeline infrastructure for the region to enable the harnessing of our regional value propositions.
- There is a lack of detail in relation to the improvements planned to the N4/N5. These have been given top priority by both the Budget Oversight Committee and the Transport Committee of the Oireachtas. In order to ensure that the necessary infrastructure is provided and to ensure that regional imbalance is counteracted, it must be specified that upgrading of the N4 and N5 will take place to dual carriageway/motorway standard for the entire length of these arterial routes.
- National investment in substantial infrastructure provision and improvement is of cross road networks within the Midland region is required.
- Towns in the 'Outer' EMRA could thrive if the infrastructural linkages to Dublin are improved to include motorway and high-speed rail. A commute of less than 60 minutes to Dublin from the 'Outer' counties in the EMRA region would lead to increased opportunity and quality of life for those who commute; would make the 'Outer' Midlands Region more attractive for investment; and strengthen opportunities to sustain economic development.
- To encourage greater use of sustainable transport, the provision of efficient high speed public transport links in the form of an upgrade of the existing rail network with dual tracking linking Dublin with the Northwest is essential.
- The NPF should recognise the opportunity to develop a regional airport in the 'Outer' Midlands Region at the existing Abbeyshrule airport.
- The draft NPF fails to identify investment in critical enabling infrastructure in terms of the electricity grid to enable the harnessing of our renewable energy potential.
- A major gas pipeline needs to be provided from Athlone to Sligo.
- Remove the Hierarchy of Settlements and Related Infrastructure diagram. It is factually incorrect, derived from an old source '*Strategic Investment Board Limited, 2008*', and very discriminatory towards Rural Ireland and its small towns that serve much larger hinterlands than is recognised in CSO figures. In many cases the rural hinterland of these small towns contains much larger support populations. Granard in Longford, for instance, with a current population of 1,397 has a support population of 6,000 in the surrounding area and its economy and social service provision supports this larger population. Alternatively clearly indicate that it is indicative only and very flexible.

### *Capital Investment Plan*

- As the links to the Capital Investment Plan will ensure that future infrastructure provision will be linked to areas of population growth, the limited number of '*large towns*' designations in the 'Outer' EMRA counties will lead to lack of opportunity for adequate infrastructure provision, thereby accentuating the deficiency in services and existing severe underperformance in the region.
- The NPF must acknowledge the designation of Athlone and Sligo as Regional cities and by implication enable the fast tracking of the Capital Investment Plan's consideration and prioritisation of necessary infrastructural investments, rather than awaiting the outcome of the RSES.

- The National Investment Plan is unlikely to contain the investment tools to allow the Midlands to perform to its potential when it does not exist as a tangible entity in the draft NPF.
- The initiatives regarding state owned lands being focussed only on lands in cities and large towns could miss the opportunities and challenges for state owned lands in rural areas. The potential of state owned lands in their totality should be addressed in the NPF, in order that the National Investment Plan will provide for investment where necessary to deliver the potential.

### **Tourism**

- The draft NPF fails to recognise the Fáilte Ireland 4<sup>th</sup> tourism brand covering the greater Midland area. This new branding and marketing package clearly recognises the separate entity that the 'Outer' Midlands Region is in its own right. The Midlands bears a closer relationship to the North and West Region than Dublin and the East and this should be clearly identified and positively considered in the NPF.
- The 'Tourism' section should include reference to the encouragement of key flagship developments which will give rise to considerable employment benefits in the regions.
- Center Parcs should be included as a successful case study.
- An additional objective should be included to support and promote the development of sustainable and green Tourism in Rural Areas to deliver real social and economic benefits to rural areas.
- Additional objectives should be included to support and promote the development of a National greenway network through Ireland to support sustainable transport and tourism related benefits.

### **Climate Change**

- The Strategic National Land Use Plan for Peatlands in State ownership should be widened to include industrial peatlands not in State ownership, and to include community, tourism and carbon sequestration uses.
- Alternative Renewal Energy options offshore should be favoured.

### **Other**

- In relation to smart growth, addressing decline in towns and villages, liveability, place making, service sites initiative etc., it is imperative that funding follows and is front loaded given the current severe strain on many settlements throughout the country.
- The HNDA, zoned and serviced land Development Plan requirements, Smart Growth initiatives, Brownfield/infill development, public realm and liveability aspirations, service sites initiative and enhancing low carbon transport will demand a commitment at a national level to adequately resource the Local Authorities.
- The terms 'infill', 'Brownfield' and 'the built up envelope of existing settlements' are used interchangeably and require clarity.
- The Draft NPF has no maps. Maps should be included in the final document.

### **Conclusion**

The connection between unsubstantiated population percentage allocations, with consequent significant de-zoning, reduced infrastructure and job investment and overly excessive restrictions towards 'one off' housing and the application of an associated HNDA model will result in the decimation of Rural Ireland and the 'Outer' Midlands Region in particular.

Government has an opportunity to address rural decline, regional imbalance that has developed over the past 40 years, provide for strategic infrastructural investment and rejuvenation and regeneration of rural towns and villages. Longford County Council's submission highlights a number of areas which, if addressed in the final document, will support the Government's vision for Ireland 2040.