

From: Dara Calleary <Dara.Calleary@Oireachtas.ie>
Sent: 09 November 2017 12:05
To: National Planning Framework
Cc: Angela OHara; Liam Henry
Subject: Submission re Draft National Planning Framework-Ireland 2040

A Chara,

I refer to the latest consultation on the draft of National Planning Framework (NPF).

The latest draft is a serious blow to those who believe in balanced regional development. It simply cannot proceed in its current form.

There are a lot of vague aspirations within the document but the specific proposals of the draft and the overall tone of the language will be detrimental to true regional development. It will place the so called "large" and "small" towns and rural areas at a considerable disadvantage to the designated cities who will have the financial clout of the forthcoming capital plan behind them whilst the other areas will have to await a spatial planning process to be led by the regional assemblies. The plan as currently worded will take also further powers and discretion away from local authorities in relation to planning in their areas.

The original consultation document sets the following challenge

The National Planning Framework will also be a tool to assist the achievement of more effective regional development. In order to ensure that positive outcomes arising from national growth can be shared by people throughout Ireland, the potential of all areas will need to be realised, relative to their capacity for sustainable development.

The plan as phrased completely fails in that challenge and in fact if implemented will constrain the potential of many areas to develop in a sustainable manner.

There is inherent criticism within the plan of the previous NSS which designated Growth centres and Hubs. This plan lacks the courage to even do that. Instead it relies on the existing cities and leaves the designation of other centres to regional assemblies and regional authorities without providing a criteria, a timeline or resources.

The following points are by no means exhaustive but reflect my principal concerns in what is a very flawed document. My overall view is that document is not fit for purpose and needs to be extensively revised and re-submitted for further consultation.

(1)National Policy Objective No 7 re cities, large towns & small towns

The plan recommends growing the existing cities and has a relatively prescriptive set of proposals in relation to infrastructure development for those cities. This list has to be viewed in the context of statements made that this NPF will be aligned to the proposed revision of the Capital Plan. Will these proposals therefore become the capital plan and areas not designated as cities will therefore be left with the "crumbs" of the capital plan?

In contrast there is a vague statement about a "Regional Spatial & Economic Strategy" (RSES) for towns in excess of 10000. However there is no timeline attached to this proposal and where will the associated infrastructure projects be funded from? Will this process apply to towns with less than 10000 people?

Many proposals were made during the most recent phase of consultation around the development of Sligo as a growth centre to anchor the North West. Given the importance attached to cities in this draft plan and the priority attached to their development why were the Sligo proposals not proceeded with? The notion that there will be no major city north of Galway defies the concept of balanced regional development and is a central flaw in the draft

strategy.

(2)National Policy Objective 9b re the selection of locations for employment growth

What criteria will be given to the Regional and Local Authorities to identify and quantify locations for strategic employment growth? What resources will be given to them to complete the process? What level of public consultation/input will be involved? What is the timeline?

If you do not live in an area designated as a location for strategic economic growth -what future does this plan lay out?

(3)National Policy Objective 9b & National Policy Objective No 10 re presumption in favour of development of existing urban areas

This will exclude rural areas from employment growth. What will the implications be for Rural areas/Gaeltacht areas/ island communities

(4)National Policy Objective 14 & National Policy Objective 15 re targeted employment growth in small towns and rural areas and the reversal of rural decline in the core of small towns and villages

See point (2) above. Also which plan will take precedence-the RSES process or the County Development Plan? Will the power of local authorities around their development plans be completely undermined in future?

(5)National Policy Objective 17a 17b 18a 18b 19 38 39 in relation to rural housing and single housing and the local Housing Need Demand Assessment (HNDA) and how they contrast with Policy Objectives 3a 3b & 3c

Who or what body will define "demonstrable economic demand" as per 18b? What is the process involved in the HNDA and will this process reflect the different needs of different areas depending on population trends, economic and social opportunities etc

Are these provisions qualified by Policy Objective 3a 3b & 3c?

I feel the need to repeat much of my previous submission re The West & North West as it seems our key needs have been overlooked or given a mere nod in this version of the plan.

Contrary to the provisions and the language of this plan-we exist!

And we don't want to be just about the Wild Atlantic Way and tourism as suggested by the Minister in some of his public commentary on the NPF review in January 2017-we are proud to offer some of the best tourism experiences in the world but we are also proud to be an International Healthcare Hub, a location for International Data Storage, a location for Off Shore Energy, be home to some of the strongest third level institutions in the country, home to many of the leading Multinational Companies in the world, home to a burgeoning creative sector, home to a unique food industry and so much more!

The consultation document poses the question as to services and resources that are needed in the context of building sustainable communities-in that context the NPF review should prioritise Mayo, Sligo, Galway, Roscommon & Leitrim in the following ways

- (a)Recommending the Upgrade of the N5 Mayo to Longford road
- (b)Recommending the Upgrade of the N4 from Longford to Sligo
- (c)Recommending the completion of the N26 Upgrade Ballina-Swinford Road as a project that highlight connectivity with the N5 and the N17
- (d)Recommending in the context of regional connectivity and of BREXIT an enhanced North South Transport connection from Derry to Cork utilising public transport assets and new road projects
- (e)Designation of Ireland West Airport Knock as a major Economic driver (see later point)

- (f)Completing and then properly time tabling the Western Rail Corridor as a freight and passenger service offering access to ports and also access to employment, education, healthcare and leisure requirements
- (g)Recommending and been ambitious about the need for Broadband Speeds that allows people to work from regional locations, that allows industry in the region to be at the cutting edge of their chosen field, that allows families to live in rural locations whilst having access to essential services which are increasingly online and demand fast download speeds.
- (h)Recommending & supporting a modern and regionally connected public transport system that involves both stage companies and private operators
- (i)Recommending in the context of the Capital Plan review (see above) and in the context of planning based on inter regional connectivity recommending an upgrade (and an alignment of road expenditure to achieve this) of the Non National regional road network that links key population, employment & service, health zones with smaller populated towns and areas eg the R312 connects Castlebar to the energy and tourism hub of Erris-properly upgraded it offers tremendous sustainable potential to both centres.
- (j)Investment in rail freight facilities and lines including an upgrading of the rail line to/from Foynes port and the enhancing of inter regional rail services

Ireland West Airport Knock

Ireland West Airport Knock is geographically perfectly located to be an economic driver for the country. The NPF review should highlight the advantages it offers including the access it has to the UK (and through these routes to many other international locations) and the attraction this is for business in particular. Over 700,000 passengers used the airport in 2016 and it employs at peak over 150 people.

- (a)Its location on the N17
- (b)The involvement of all local authorities in the West in its ownership structure demonstrates the abilities of local authorities to work together on a shared economic future
- (c)The public land adjacent to the airport is currently the subject of an SDZ application. This has the potential to be a regional economic hub offering opportunities for developing an aviation hub, an energy hub, data management and call centres.
- (d)The further development of services to and from the airport-including a US service-will allow it to be a vehicle for building a sustainable economic future for the region

Public & Community led transport including the Western Rail Corridor

The NPF review should support the delivery of a properly funded Public and Community led transport model. The Public transport network should be reviewed and assessed to ensure that it continues to be relevant to the living patterns of those it seeks to attract. Bus and rail timetables should be aligned to assist people in accessing employment, education and public services (including health) in the designated growth centres.

The rail service should become an inter regional service as well as an access to Dublin service-for instance properly timed commuter trains to and between Galway, Sligo & Mayo along the Western Rail Corridor will give opportunities for workers, students, for those accessing health appointments etc.

Community Led transport models should be encouraged and funded where other models are not commercially feasible in order to encourage sustainable communities.

Supporting Education & Local Enterprise

One of the biggest draws of population from the regions to Dublin is education. Students leave their communities at 18 and many will not return.

The development and support for NUIG, GMIT, GMIT Castlebar & IT Sligo are crucial in this regard. They should also be supported in providing Incubation & Enterprise Space both on campus and across the region to encourage the development and growth of an indigenous local enterprise base.

Education facilities and resources at primary & secondary level should be protected.

Supports to sustain and grow local communities & towns (including Gaeltacht & Islands)

Whilst growth centres will be designated as part of the NPF review this is a National Planning Document and it should outline a vision for all communities. That should involve addressing communication deficits (broadband, mobile phone coverage) road infrastructure deficits, public transport deficits, addressing the deficiencies in primary healthcare provision, deficiencies in childcare provision, the provision of sheltered housing for the elderly and for those with additional needs in order to keep them in their home communities, and a statement of support within the document for local development initiatives such as greenways which are economically and environmentally sustainable in turn encouraging tourism and SME growth.

Our towns are in need of an injection of capital and political support to sustain their future. The NPF should contain a statement of support for our town and should issue a resource and a political challenge to sustain their future.

Our Gaeltacht communities and Island Communities are entitled to support in this review-their future is dependent on a co-ordinated government effort to address their challenges.

Agriculture

The NPF review should contain a statement of support and outline a series of principals to sustain and grow agriculture and farming as the key economic driver of rural communities.

Healthcare

As a support for sustainable communities and to reduce the travel burden and the associate transport burden on large urban centres there should be a statement of support for the proper resourcing and development of primary health care services which are locally based. The proper use and resourcing of the existing GP, Pharmacy, District Health Services & the Community hospital network could alleviate pressure on the large regional hospitals, reducing unnecessary journeys and allowing the development of a strong speciality led regional health service.

Yours Sincerely,

Dara Calleary

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