



9<sup>th</sup> November, 2017

Niall Cussen  
Forward Planning  
Department of Housing, Planning and Local Government,  
Custom House  
Dublin 1.

Dear Niall,

Many thanks for the recent information meeting hosted by your team in Granard last month in relation to the Draft National Planning Framework which is currently on public consultation. It was particularly helpful to have Minister English attend and address some of the members' concerns and issues. At the last meeting of Eastern and Midland Regional Assembly held on 13<sup>th</sup> October, 2017, the members also discussed the Draft. The Members have instructed that I issue the following comments from their discussions at that meeting and from the meeting with the Minister. I have set out each contribution separately as bulleted paragraphs below.

- Concern expressed over the impact the draft National Planning Framework would have on the Midlands SPA, there is too much focus on cities and not enough supports for rural Ireland. There is a serious restriction on one off rural housing in areas within urban influence and much of the region would be included in this area. There would be no economic activity in the Midlands as a result and it would lead to downzoning in many locations. There is nothing for the County of Longford and Athlone should in included as a key settlement.
- Similar to the National Spatial Strategy there are still winners and losers and the document supports only the 5 cities and the Northern and Western Region, there is nothing for the Midlands. Rural development cannot take place as there is a functional need restriction in the policy, making any development impossible.
- The framework is based on the failed economic policy of FDI – to direct growth away from Dublin. How can the plan force growth outside of Dublin, like the FDI policy this rebalancing approach will not work? The key urban centers outside of Dublin City are not considered and their propped growth will be severely constrained. Planned infrastructure and economic growth around the airport, Swords and the M1 corridor is not considered, and will be hindered by the plan.



- The plan is difficult to interpret and the text can be confusing. Coupled with the de-zoning as a result of the implied growth figures, this could lead to legal challenges (on interpretation or de-zoning). It will be challenging to make a Regional Spatial and Economic Strategy, a Development Plan or a Local Area Plan that is consistent with the NPF as it will not be acceptable at a local political level. It is unclear which boundaries relate to which policies and in this regard the Dublin Metropolitan Area should be reexamined as additional settlements should be included. The Eastern Counties grew and met the demand when Dublin didn't historically so how will Dublin now be the focus of growth?
- The draft NPF will restrict Portlaoise. For example, the Laois Development Plan core strategy has planned for 5,000 population growth to 2023, however a 25% growth rate to 2040 only allows for a 5,500 population growth. With some €750m in public investment in infrastructure in the last 15 years, it would mean a poor return on significant public investment. Towns under 10,000 population will effectively have no growth and this will lead to further decline. The Midlands will just become suppliers of renewable energy to the rest of the country with no population, and there is still no guidelines for development of wind energy.
- The draft NPF is considered a reasonable starting point, Ireland is becoming increasingly urbanized and we have to accept this, however it also needs to cater for rural Ireland. Concern over how the policies will be delivered, a new governance model is required especially at metropolitan level. There are too many new boundary definitions and it should just be Dublin County with a plan and governance body.
- Huge concern on the impact on the Midlands as it is being downgraded, it will have an impact on rural landscape, planning and housing. There is a consensus amongst key stakeholders in the Midlands that this will have a negative impact. What will happen next for local authority planning, will development plans be revised as a result?
- There is no reference to how this plan will be implemented and financed and how LAPs will be delivered or are they now defunct. CFRAMs are referenced but they are not finalized / adopted. Will this plan force people to live in urban areas and what will happen to rural areas – no policy supports, it ignores that people choose where to live? Portlaoise is not supported, it has no reference to Athlone and looks east to Dublin and South, it grew significantly despite no NSS support and it should be allowed to continue to grow.

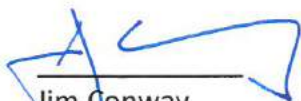




- The draft NPF is too Dublin centric and the proportional allocations and hard numbers are too restrictive. How can this growth be achieved in cities, is the land available? Will existing rural services be maintained in the face of declining population, 1/3 of Kildare population is rural so it is relevant to all of the region? Is the 10,000 population threshold fixed, Athy is just below this threshold so that restricts its growth to just 15%?
- What infrastructure is named in the draft NPF? Transport and communications are needed to support rural Ireland. Has quality of life been considered as a key issue?
- Where is the rail based development policy that has been in place for the last number of years? There is no reference to development around rail corridors or nodes and increased density at these locations and this is not a factor in settlement prioritization.
- Do we have the infrastructure (rail) capacity to provide for the additional growth in Dublin city? Even with no population increase there is a significant housing demand that is not being currently met, how can we accommodate the demand for single occupancy housing. The focus on four alternative cities to Dublin is flawed and it should focus on one to provide a sufficient counter balance.

This letter follows on from the Eastern and Midland members' submission and that of the Executive at issues stage. I trust it sets out the concerns and issues raised by the members and assists you in finalizing the final National Planning Framework.

Yours Sincerely,

  
Jim Conway  
Director