

The submission of the Wicklow Planning Alliance with regard to the draft National Planning Framework 2040 is attached below.

The WPA is a voluntary organisation concerned with responsible and sustainable planning in Co. Wicklow. We are also members of the Public Participation Network (PPN) in Co. Wicklow.

Our comments are joint observations made by our members and submitted c/o myself;

Dr. Richard Webb



Submission on the Draft National Planning Framework from the Wicklow Planning Alliance

We wish to make the following observations on the above:

In general terms the draft NPF is disappointingly superficial and appears to follow a ‘business as usual’ approach in thinking. Given the problems that we are currently facing and will face in the not too distant future, one would have expected some fresh thinking on the issues raised. It is not too late to do so. As it stands, the NPF reads as little more than a nicely illustrated wish list lacking expert input of critical thinking or even understanding of the issues to be tackled.

1. The production of County Development Plans before that of a National Planning Framework is rather ‘back to front’ to put it politely. As it currently stands, for example, the Wicklow CDP runs until 2022 so for at least five years it will be business as usual.
2. Does the NPF take precedence or will be back to the disastrous ‘have regard to’ approach in CDPs?
3. That there is a distinct lack of goals, targets, priorities, timescales, responsibilities and above all a system of monitoring, confirms the NPF to be merely a wish list.
4. There is no requirement for interagency co-operation, as highlighted by the submission from Wicklow County Council. At present we suffer a ‘tail wagging the dog’ approach where state agencies, such as TII for example, produce their proposals without regard to CDPs. Another example is coastal erosion, where we have about 15 bodies involved in the issue. Who is responsible? We face the same issue with regard to the flooding of the Shannon on almost a yearly basis.
5. Local authorities complain that central government issues it with an allocation of figures for population growth but that projection in population is not matched with funding for infrastructure to support that growth. However, it is the Council that disperses the population growth by land use zoning in a way that does not facilitate the best use of funding for infrastructure.
6. There is no requirement for cost/benefit analyses of the NPF proposals or for major projects, such as Metro North, that would enable ‘pet projects’ to be properly assessed.
7. Where the NPF seriously falls down is in the treatment of climate change, especially in the light of the recommendations to government of the Citizens Assembly. This shows that government has no understanding or concern regarding the seriousness and the implications of climate change. The issue is so serious and profound for Ireland on so many levels that it should be a key component of all proposals. This is the only chance we have to get this right.

8. There is little understanding regarding the vital importance of land use and land management in tackling climate change, such as zoning and flood plains, the restoration of bogland and natural forests to absorb carbon and reduce flooding and the value of sustainable farming systems.
9. With energy, no mention is made of the EU requirement for all new houses to be nearly zero energy by 2020, which can be achieved by support for rooftop solar for houses, farms, and public buildings for both new build and existing stock, as well as the need for deep retrofitting for the existing stock of homes. There is no commitment to community involvement in renewable energy generation, which arguably has led to community objections to most renewable energy projects.
10. In terms of transport, the proposals are entirely road based, with no understanding of the implications for good planning or climate change, or that more roads produce more traffic and as such, more the business as usual approach. This is an issue that is especially acute in Co. Wicklow with the N11/M11 congestion. Priority should be given to upgrading rail infrastructure, more frequent rail services and improvements to rail and bus timetabling, extending the LUAS to Bray rather than ending it in the middle of nowhere and Quality Bus Corridors, with more park and ride and integrated public transport services. It is also noted that no mention is made of the Dublin rail/DART interconnector that would markedly improve travel around Dublin and has a more favourable cost/benefit outcome than Metro North, which is proposed.
11. No mention is made for the upgrading of ports at Rosslare or in the Cork area for direct access to Europe post Brexit.

The Wicklow Planning Alliance was one of many that made earnest and balanced submissions to the organisers warning of the consequences of failing to get real about climate change and suggesting measures that should be considered to mitigate against the threats facing Ireland and it is disappointing to see that these have not been taken on board.

However, we recognise that the objective is to get everyone focussed on the same outcome. We would hope that the deliberations of the Citizens Assembly on climate change will be incorporated into the final plan. We presume that the plan will be rewritten dynamically, we hope before final publication, but certainly over the years so that a sustainable future is realised.

Presented on behalf of the Wicklow Planning Alliance

c/o Dr.Richard Webb

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