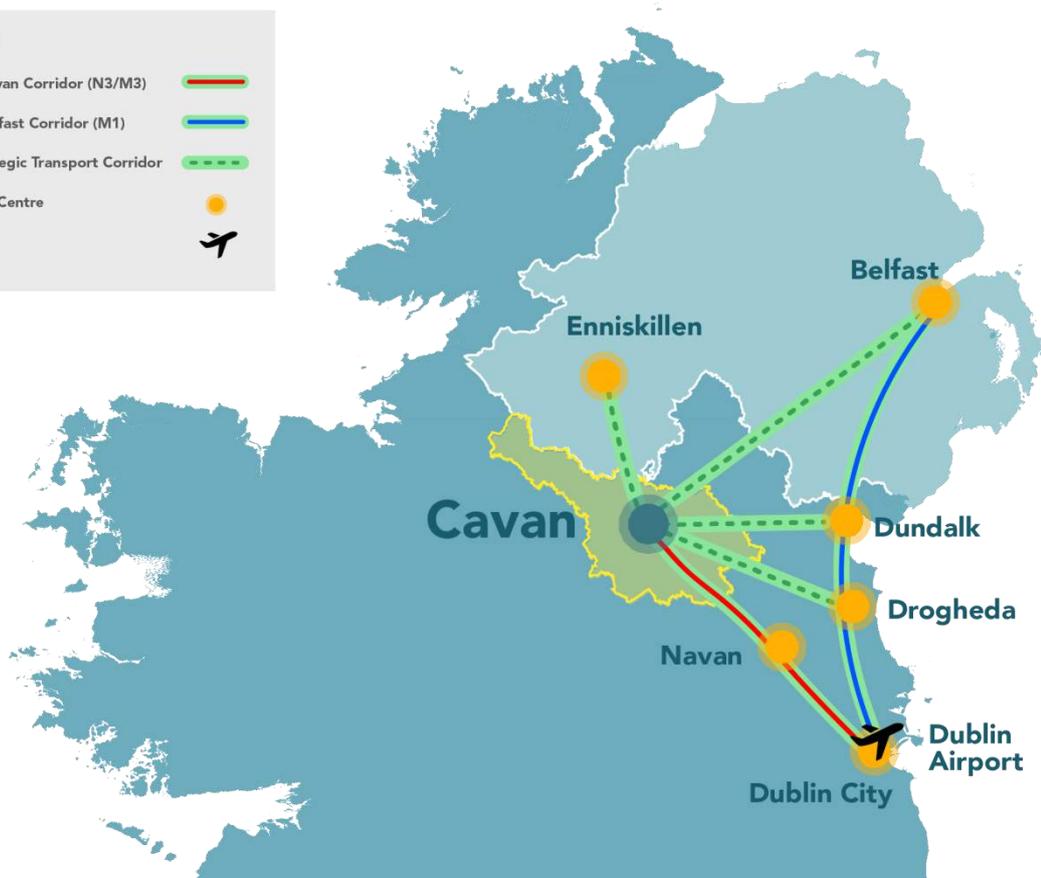


Submission by Cavan County Council

Draft National Planning Framework Consultation



November 2017

Chief Executive

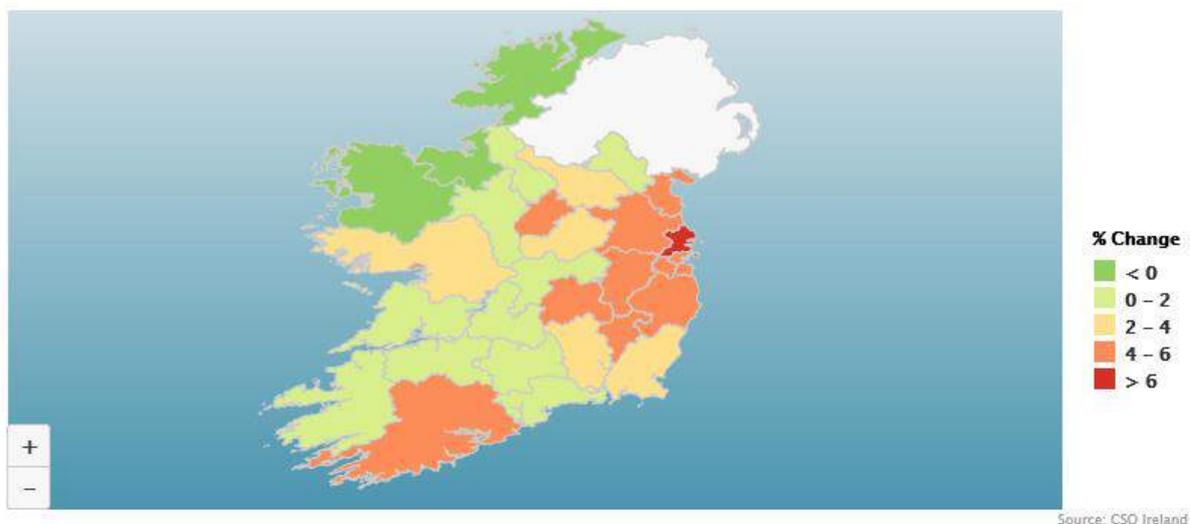
Introduction

Cavan County Council welcomes the publication of the Draft National Planning Framework and the opportunity to make a submission. Having considered the draft document, Cavan County Council highlight the following key strategic aspects to be considered as part of the National Planning Framework final document.

Growth within Region:

The Draft National Planning Framework regional parity approach is welcomed, however, the targeted growth for the Northern and Western Region will not result in any percentage population growth for the region by 2040 and, in fact is likely to fall (current share of national population in region is 17.8%, which is likely to drop to c. 17% with current Draft NPF targets). The region has been the most stagnant of all three regions over the last census period and it is important that sustainable growth is facilitated in the region. The targeted growth rates in the region are 150,000 to 175,000 persons. The draft NPF does not provide the basis for arriving at this figure and, as such, it is difficult to comment on such growth targets and whether such targets will delivery regional parity. For example, County Cavan has seen the most growth over the last census period within the region with 4% growth, with the next highest being Galway at 2.2% (see map 1 below). The growth of County Cavan also reads positively when compared nationally. The National Planning Framework and in particular the Regional Spatial and Economic Strategies need to recognise that for sustainable growth to occur within the region, counties experiencing growth should be recognised in population targets.

When the actual targets within the Draft National Planning Framework are broken down to a county by county basis, concern arises that the growth of Cavan may not continue unless the Regional Spatial and Economic Strategies allow for growth beyond any targets set. It is suggested that the National Planning Framework clearly establishes the principle that a pro rata population distribution approach will not be sustainable for regions and that places within regions experiencing growth should be supported.



Map 1

Investment:

The region has suffered investment imbalance in the past in key areas such as broadband, energy, accessibility, water/wastewater and education. It is important that this imbalance is corrected in the National Planning Framework and National Infrastructure Plan. The National Planning Framework in this regard will need to

clearly recognise that there will be a need to provide infrastructure at locations beyond which certain levels of demand might suggest and that such investment occur with the upcoming Infrastructure Plan. If this is not recognised then the region will fall further behind and will not be in a position to act as a counter balance to the congested Dublin Region and will not be in a position to fulfil its potential. Delivering infrastructure to the region early is essential for the region to grow. Therefore, important infrastructure such as upgrades to the N3, N4 and N5/A2 should form part of the National Infrastructure Plan 2018-2027.

The upgrade of the Dundalk/Cavan/Sligo East West strategic route is also very important to the border region. This is currently a heavily trafficked poorly aligned route serving significant FDI and indigenous businesses moving goods to Dundalk, ports and Northern Ireland. Previous studies and policy documents have highlighted the need for improved road infrastructure in the border area as being vital for future economic development and the Cavan to Dundalk route in particular has been identified as strategically important in this regard. Without the upgrade of this strategic route economic growth in the region will be stifled. It is essential for the region that under the heading Enhanced Regional Accessibility the Dundalk/Cavan/Sligo East West strategic route upgrade is listed.

Brexit:

Brexit will have consequences for the economies in Northern Ireland and the Republic of Ireland, however, there is little doubt that the counties immediately north and south of the border will be most significantly affected. The border counties need to be recognised in the NPF as the part of Europe most impacted by Brexit. The impacts have already been witnessed in the agri-foods sector. The National Planning Framework needs to present a clear strategy to insulate the already peripheral border region from possible negative impacts and identify the need for a dedicated fund and investment to counter such impacts and take advantage of opportunities that may arise. The NPF needs to address the structural weaknesses in the border region and mitigate against any negative impacts of Brexit. The NPF needs to recognise the unique circumstances of the border counties with its unique cross border interaction. Businesses in Northern Ireland may wish to relocate or create a secondary presence in the EU but wish to remain close to their existing catchment. The National Planning Framework must provide border counties such as Cavan with the investment needed to make the most of such an opportunity.

Education:

Of those people living in County Cavan that have completed their education, 28% have attained a third level education. By way of comparison, this figure stands at 35% for the State.

The educational talent base is fundamental to ensuring a supply of skilled individuals and a broad ranging talent pool, however, the lack of a third level institution in the county and the employment opportunities available in the larger cities for graduates is a significant challenge for the retention of skilled people in the county and region. To mitigate this, there has to be an innovative, strategic and collaborative approach to harnessing the current educational institutions in the region to develop the provision of blended education across the region (e.g. Connacht-Ulster Alliance GMIT, ITS and LIT).

For over 25 years, Cavan Institute has provided the highest quality education and service to the people of Cavan and beyond. The Institute has been at the cutting edge of developments in Further Education through innovative course development. There are a number of different functional areas within the Northern and Western Region. As recognised in the draft National Planning Framework, Cavan Town is positioned to act as a principal town in terms of housing, job and education delivery. To address the lower level of third level qualifications in the sub-region and enhancing the talent base, there is a clear opportunity to build on Cavan Institute foundations in the National Planning Framework to establish an Institute of Technology in the town to serve this sub-region.

Single Housing:

National Policy Objective 18b:

In rural areas under urban influence, to facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic need to live in a rural area and relevant siting criteria for rural housing in statutory guidelines and plans.

It is recommended that single houses in the countryside include social/community functionality in addition to economic functionality.

Implementation:

Implementing the Ireland 2040 Framework is to be guided by targeting the following national strategic outcomes as per the Draft:

- Compact, Smart Growth:
- Enhanced Regional Accessibility:
- High-Quality International Connectivity:
- Sustainable Mobility:
- A Strong Digital Economy:
- Empowered Rural Communities:
- Enhanced Urban Amenity:
- Transition to a Low Carbon and Climate
- Resilient Society:
- Sustainable Management of Water and other Environmental Resources:
- Access to Quality Childcare, Education and Health Services:

Achievement of such outcomes will determine the success of the National Planning Framework by 2040 and the Framework can only be a success if both urban and rural local authorities deliver. In this regard, it is essential that local authorities are adequately resourced, having regard to requirements in Policy Objectives 63 to 69. It is recommended that Chapter 9 acknowledges the requirement for additional resources in order to achieve the above outcomes and to ensure under-resourced local authorities are not disadvantaged given the introduction of concepts such as the National Smart Growth Initiative

Existing Urban Settlements:

Objective 3c seeks to achieve 30% of all new homes within the built up envelopes of existing urban settlements. In rural counties such as Cavan, such a percentage will prove very difficult to achieve. There are significant costs associated with heavily constrained sites of this nature and when factors such as house prices are considered, the viability of these sites in rural counties in particular is questionable. The NPF needs to commit to a mechanism to unlock such sites, by way for example of incentives, to achieve this objective in rural counties.

Concluding Remarks

The region has suffered investment imbalance in the past in key areas such as broadband, energy, accessibility and education. It is important that this imbalance is corrected in the National Planning Framework. The National Planning Framework in this regard needs to clearly recognise that there will be a need to provide infrastructure at locations beyond which certain levels of demand might suggest. If this is not recognised then the region will fall further behind and will not be in a position to act as a counter balance to the congested Dublin Region and will not be in a position to fulfil its potential.

Whilst Cavan County Council welcomes the draft National Planning Framework, the following recommendations have been made

- Recognition of growth towns and counties in the National Planning Framework and Regional Spatial and Economic Strategies to ensure that their growth continues.
- Recognition that the previous investment imbalance in the region needs to be corrected in the National Planning Frameworks and National Infrastructure Plan including a commitment to deliver upgrades to the N3, N4 and N5/A2 and the Dundalk/Cavan/Sligo East West Strategic Route.
- Recognition of the threat of Brexit to counties in the border region and a national commitment and allocation of a fund and investment programme for the region.

- Recognition of the need for a Third Level facility in the central border area and identification that Cavan Institute is strategically placed to establish an Institute of Technology in the town.
- The NPF needs to commit to a mechanism to unlock urban sites, by way for example of incentives, to achieve objective 3c in rural counties.
- That the National Planning Framework recognises that additional resources will be required.