



Srath na Mart
Learga
Contae an Chabháin

JOHN PAUL FEELEY

County Councillor



Stranamorth
Blacklion
Co. Cavan



National Planning Framework,
Department of Housing, Planning and Local Government,
Custom House,
D01 W6X0.

8th November 2017

Re.: Ireland 2040 Our Plan - Submission

Dear Sirs,

I am one of six county councillors who represent an electoral area stretching from Blacklion and Dowra in the West of County Cavan to Killygarry east of Cavan Town. It is a vast area which encompasses many of the challenges faced throughout the country in that the western part of the electoral area is very much rural and as a result of negligible state investment an area in decline whereas in and around Cavan Town has been significant development over the years with increasing population and indeed substantial potential for further development given the right conditions. It is effectively on the fringe of the Dublin Commuter Belt.

There are a number of issues which I feel are of concern to the areas which I represent and which I believe should be reflected in the National Planning Framework (NPF) for the years ahead.

Our County as a whole and particularly the western part thereof have suffered significant depopulation over recent years and it is essential that nothing of the NPF could be used to prevent necessary investment in services and infrastructure and in particular potential increase in population. In fact the NPF should facilitate and encourage investment, development and population in these regions at a higher rate than other more densely populated areas.

The blanket approach to increases in populations within designated towns and villages with a proposed cap of 30% does not allow for the potential for the towns in the region to ever catch up with or indeed surpass other parts of the country which have had significant population growth in the past. The 30% figure prevents counties such as Cavan and the towns, villages and communities within from ever bridging the gap with the rest of the country. A general percentage cap is not acceptable.

Appropriate well considered development which has generally been the case in County Cavan should be left at the discretion of the local authority who are best placed to take account of local factors and variation of needs within the region generally and within particular parts of their administrative area.

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It is also essential that Irish Water and Government adopt a flexible approach to investment in provision of additional capacity in water, waste water and other infrastructure to facilitate potential development in towns and villages.

The need to address the traditional economic imbalance within the country must be reflected in any plan and as such provision must be made for dedicated and frontloaded investment in regions such as County Cavan to bring basic infrastructure such as the N3, N55, N56, N87 and N16 up to standard and also ensure that investment programmes in water, regional roads, broadband, health and education are targeted in these most deprived areas.

In particular the development of the 'East-West' link between Dundalk and Sligo via Cavan town should be included in any plan which seeks to ensure balanced and appropriate regional development.

The existence of the border has prevented economic development in this county since partition. The legacy of the Troubles in terms of a lack of investment and development has never been adequately addressed and now the threat of Brexit will further hampers development. It is essential that the NPF take particular account of these issues.

A key factor in securing investment and development in the region is the provision of adequate educational opportunities for those moving from second level education and those seeking to enhance their educational qualifications. Cavan Institute can, with adequate investment and links to institutes of technology and universities elsewhere in the country provide these essential services in the region and again the NPF must take cognizance of this need.

Given the significant pressure for development in the greater Dublin area and the substantial need for office space and accommodation for workers arising from growth in the domestic economy, likely relocation of businesses as a result of Brexit and significant FDI the NPF should make provision for an extensive programme of decentralisation of state agencies and large sections of government departments from the greater Dublin area dispersing them in an organised coherent fashion throughout the regions. The relocation of a modest number of such jobs to any regional town and exponential economic impact in that town and its hinterland and can form the basis for economic regeneration within the regions.

Rural communities have not been allowed to grow and develop and as a result of planning restrictions many communities are now withering away. Investment in local primary schools, sporting facilities and other state services will be entirely wasted if restrictions which are

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unreasonable and unworkable are not removed. The current EPA restrictions on waste treatment for one-off houses which have a particular impact in the western part of County Cavan have effectively sterilised these communities in terms of grants of planning permission. It is essential that workable and reasonable solutions are found which will allow people to provide homes in the areas from which they come. In reality these are areas where there will not be significant demands for grants of planning permission for new houses irrespective of what conditions are in place which means that it is all the more essential that those who wish to live in these communities are facilitated to the greatest extent possible.

Many communities particularly those in West Cavan have been the victims to unregulated afforestation. The current planning regulations are virtually non-existent. The NPF should provide discretion to each local authority to determine the level of exemption if any available for afforestation before planning permission is required. The planting of large-scale forestry has a destructive environmental effect, damaging watercourses through siltation and acidification, destroying sensitive environments and biodiversity.

Large-scale planting most importantly has a devastating impact on the local community, preventing local small farmers from making their enterprises more sustainable, increasing a sense of rural isolation and destroying the visual amenity of areas which have tourism potential.

There is virtually no local economic spin-off from this type of afforestation. It should be brought into the normal planning process which will allow in the first instance for locals to be aware of the plans of landowners to plant and allow them to make their feelings known and allow local planners with a knowledge of the local community to make decisions and put sensible and reasonable conditions on such development. In addition this type of development should be subject to financial contributions to the local authority on the same basis as any other development.

When initially introduced development contributions were justified on the basis that in Ireland we do not have a local property tax system. That situation has now changed and each homeowner is subject to an annual local tax. Therefore the primary justification for the introduction of development contributions on domestic development is redundant. Appropriate levies should be put in place where there is actual investment required by the local authority/Irish Water in the provision of infrastructure to service development but in all other cases the national planning framework should provide for the removal of these unjust levies for residential development.

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I trust that the foregoing can be taken into consideration in finalising this plan.

Yours sincerely,

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