

DRAFT NATIONAL PLANNING FRAMEWORK – IRELAND 2040

Submission by Pat Casey TD, Wicklow Constituency Office – The Bluebell, Main St, Arklow, Co Wicklow

The National Planning Framework sets as a goal, effective and balanced regional development. The Draft Plan as currently published does indeed place this core objective at its heart but there are significant defined goals which are contrary to the aims of this plan particularly when it comes to rural Ireland.

Sustainable and efficient planning is a framework that all responsible public policy makers aspire to. I have studied in detail and with interest not only the current draft plan but many of the submissions to the plan which I will refer to later. In that regard I would like to commend the staff assigned to this project for their diligence and commitment in ensuring transparency.

National Planning and the infrastructure, growth capacities and public investment that logically emerge from such strategies must have the widespread confidence of the Irish people as a whole.

There are also important implications for democratic governance in Ireland at both national and local levels contained within the current plan and how the plan forms a framework for taxpayer investments over a long period of time.

I make my remarks in that context and while my suggestions are prescriptive they are by no means exhaustive as the nature of public policy in all areas of planning and indeed public confidence in the transparency and logic of planning is changing.

1 – The contradictions and implications of Nested Planning

The Draft National Planning Framework by its nature forms a hierarchy of growth strategies and investment plans which have implications for every community in Ireland both urban and rural.

The National Planning Framework should have a chronological coherence to it. By that I mean that emerging from a National Planning Framework, other national strategies such as transport and energy should flow.

With regard to transport for example I do not clearly see how the TII national plan can be seen as flowing from the NPF as it not only precedes it there seems to be no adequate connection to it.

For the NPF to be coherent, all existing national infrastructure plans should flow from it.

In the context of managing the sustainable growth of Dublin for example, the transport infrastructure of commuter counties such as Wicklow must be an important element of national planning. Yet the TII and the NTA have ignored crucial investments plans for

the N/M11 and N81, and expanding and improving Rail infrastructure such as the LUAS extension to Bray, and improvements to Arklow, Wicklow and Greystones rail links.

The National Planning Framework has obvious connections to the Capital Plan yet there is no consultation with regard to the implications for Capital Plan Investment strategies and the NPF.

A national planning framework that is credible sits at the top of the Irish planning tree but requires significant regional and local government buy in.

As a former local authority member I have strong concerns at the ongoing erosion of local government in Ireland over recent years. This erosion has contributed to a growing lack of confidence in democratic governance and accountability amongst Irish people which needs to be addressed.

A National Planning Framework can empower local government. It can do so by allowing elected local authorities to contribute to the framework and indeed dispute aspects of the framework on an ongoing basis. A Framework is by nature a flexible approach to planning and the knowledge and ambition of regional and local authorities is not clearly defined in the current draft NPF.

There is also little acknowledgement and role for civic society and groups within the current NPF other than publishing the large number of submission from groups such as the GAA, Public Participative Networks's, environmental groups and concerned citizens. A public policy platform as significant as the NPF should have an ongoing role for civic society not just a submission procedure.

There seems to be little priority or co-ordination to address the barriers to the development of Towns such as Arklow and Blessington in Wicklow due to waste water treatment inadequacies.

In Arklow's case there is a 25 year saga of poor planning and of poor delivery that has hampered a key commuter Towns development in conjunction with dangerous environmental pollution.

Blessington's proximity to Dublin requires sustainable growth and development but yet again the lack of waste water capacity is preventing this. The NPF and the Capital plan must align and spell out how these key barriers to the development of towns is to be addressed.

2. Rural Ireland – aspiration but ambiguity

Rural Ireland faces significant challenges and yet contains massive opportunities to contribute to the sustainable growth of Ireland.

The deprivation index recently updated by Pobal contains the stark fact that affluence declines the further you live from urban conurbations such as Dublin. Towns with populations between 1,000 and 5,000 were the worst affected by the recession. There is now a detailed geographic map of deprivation in Ireland that must be addressed by the NPF.

The draft NPF contains a lot of aspirational and vague commitments to addressing rural demographic, social and economic decline but little on constructive proposals to address the rate of rural deprivation and the pathways to growth that would address the unsustainable growth of certain cities such as Dublin.

Local Authorities and Regional Authorities must be empowered to grow towns and villages not at the expense of rural Ireland but in conjunction with it.

No organisation has greater reach and support in Ireland than the GAA. In its excellent submission it outlines that rural decline will see the organisation lose up to 30 clubs in the Leinster region alone within the next 10-15 years.

2.2 Rural Housing

National Policy Objective 18b states “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.”

As a rural resident of Wicklow and indeed as a member of Wicklow County Council for twelve years I have substantial evidence of the difficulties that residents of Wicklow face when seeking to build a home in rural areas.

To restrict rural planning for homes to “demonstrable economic need” is restrictive in the extreme.

The draft NPF does not explain to the people of rural Ireland what they mean by economic need rather than economic and social need to live in the countryside. They have not explained what the definition of ‘must have a functional economic requirement for housing’.

If this economic need is adopted it’s another nail in the coffin of Rural Ireland except this time death by policy framework.

I would like to outline two examples that clarify the difficulty with objective 18b if incorporated into County Development planning policies.

A 4th generation family who have lived in rural Wicklow, works in a factory about 8 miles from the family home and currently qualifies to live in the area they grew up in, but because of this proposed change they don't have an economic need to live there and don't qualify so must move to the town or village to live because their need is social and not economic.

A Wicklow farmer with 3 children. One takes over the farm activities and does qualify to build a home because they have an economic need but the other 2 children have to find their home in a town or village because their need is social and not economic.

Rural housing provision cannot be just on economic need only. There must be a social need as well. For years I'm hearing from department officials and planners that the country cannot sustain rural housing in the future and I agree with some of their concerns. The officials and planner's have yet to come up with alternatives, but they excel in ways to refuse planning for families to live in rural Ireland.

This plan with policy 18b on economic need must be changed before this plan is adopted, because within a very short time of this plan being adopted; this 'economic need' will become part of the core strategy of every county development plan.

This will have a devastating effect on rural Ireland if adopted. Its already hard enough. This has to be changed. There must be a recognition given rural decline and the pressures that rural commuter belt counties face, that there is a vital **Social** need for local people to be able to build a family home in rural Ireland.

This is the only part of the NPF where it's proposed policies (18a 18b & 19) have a direct effect on an individual ability to build a home. The language used is written in in such a way as to deflect from the direct implications it has on an individual person.

National Policy Objective 18a states "Ensure, in providing for the development of rural housing that a distinction is made between areas under urban influence i.e. areas within the five city regions and the hinterland of towns, and elsewhere and that the standardised EU/OECD definition of a city region shall be applied to identify the urban influence of cities and large towns (>10,000), with influence of smaller (>10,000) towns determined locally."

National Policy Objective 19 states "Project need for single housing in the countryside through the local Housing Need Demand assessment (HNDA) tool and county development plan core strategy processes"

Other text in this section needs clarity and should be explained and even map on a map identify the areas it's referring to

It is necessary to differentiate between rural areas within the five city regions, which are defined by a commuter catchment of at least 15% of the relevant city area workforce, and those outside the city regions or the hinterland of towns of all sizes.

The standardised EU/OECD definition of 15% should also generally apply to the hinterland of large towns (>10,000), with some local variation possible in relation to ED boundaries. The scale of the hinterland of towns will vary depending on the scale of the settlement and the area under the influence of smaller (>10,000) towns is best determined locally.

To quote the submission from the GAA, “consideration should be given to a relaxation of the controls on one-off housing in the countryside in areas where serious population decline or a demographic profile skewed towards the older age cohorts is endangering the survival of the community itself and organisations such as the GAA Club, which are critical to their viability as sustainable communities. Consideration should be given to the formulation of meaningful incentive schemes to attract people to live in these communities.”

2.3 Contradiction of rural planning Vs Industrial Wind Farms

The main reason supporting the restrictions on rural one off housing is the risk of damaging our landscape and the fragile eco-systems. The National Landscape strategy adopted by Government mandates the Government to be cognisant of planning strategies and their impact on the unique landscape of Ireland.

Wicklow has a rich and unique landscape that has benefited and indeed been created by human habitation in rural areas over many centuries.

It is ironic that while our National Planning Framework and Development Plans seem determined to stop people living in rural Wicklow as they have done to the benefit of the landscape over hundreds of years, the Government is determined to permanently damage our landscape by the fast tracking and incentivising onshore Industrial Wind Farming.

The NPF must take into account the reality of human habitation in rural areas such as Wicklow over hundreds of years that create the wonderful landscape that we have and the impact that 150 metre tall Industrial Wind Turbines will have on our unique upland views.

2.4 The potential of Ireland’s rural landscape re Tourism and Greenways

The Wicklow Landscape as currently exists forms a key pillar and a perfect example of a unique rural landscape on the fringes of a major urban centre that offers ideal opportunities for sustainable development with supports for outdoor recreational infrastructure such as walking and cycling trails.

The NPF can protect these unique landscapes while at the same time promote a sustainable economic model of development.

As a Glendalough Hotelier I have a lifetimes experience in the development and value of the tourist/visitor economic model in Wicklow. I have campaigned for years that this is a county-wide industry that must reach every part of Wicklow and indeed the East Coast Region capturing the Dublin and International market.

The Eastern Region would benefit substantially particularly rural towns and villages by a network of walking and cycling trails, co-ordinated signage and standards and marketing by Fáilte Ireland. The NPF should prioritise these developments.

Greenways such as the Arklow – Shillelagh outdoor trail and the Blessington greenway are just two projects that would be transformative if supported through planning strategies.

2.5 – Rural Port Towns, & Coastal Erosion

The current draft NPF refers to the strategic development of Tier 1 and Tier 2 ports only. While there it is essential that the Irelands national ports be of a high standard the many port towns such as Wicklow and Arklow have massive potential to make substantial contributions to the regional economy if coherent plans are put in place.

Wicklow Town and Arklow along with many other port towns all along our coast line have a maritime tradition and heritage that have sadly been allowed to decay over many decades.

As an Island nation the maritime tourism and the fishing industry need to be included in any NPF that wants to see an balanced, regional and sustainable planning until 2040. Excluding our port towns and their potential is an omission that must be fixed.

Coastal erosion measures have also a massive impact on the potential of Ireland coastal towns to develop in a sustainable way. Apart from the obvious damage to our landscape there can be substantial damage to our infrastructure such as the damage to the railway line at the Murrough in Wicklow Town.

Arklows coastal erosion has seen the disappearance of a beach and the construction of adequate measures would not only protect the town of Arklow but allow the return of a sand beach which would have significant benefits for local people and visitors.