

**SUBMISSION TO THE**

**National Planning Framework - Ireland 2040**

**Laois County Council**

**10th November 2017**

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**INTRODUCTION**

Laois County Council welcomes the National Planning Framework and supports many of the worthwhile objectives and outcomes that are outlined therein. At the Consultation stage the following strategic issues were outlined by Laois County as imperative to a final document as follows: -

- Ensuring Good environmental standards are met across the Country
- The Creation of Jobs and employment zones within the Country to counteract unsustainable growth patterns and commuting patterns
- Investment in our Social Infrastructure
- Creation of Tourist Initiatives to sustain Rural Ireland
- Infrastructural requirements for the future growth of the economy

Laois County Council notes that much of this has been reiterated through the new National Planning Framework. The principles and guidance it promotes in relation active land management and zoning is welcomed.

Laois County Council acknowledge the role of **the Planning Regulator** but queries the intended detail, breadth and depth of any delegated powers to such a regulator, how it would interface with An Bord Pleanala and how it would impact on the principles of subsidiarity and local decision making.

Laois County Council welcomes many aspects of the Draft NPF in particular the following:

- i. **Climate Change and environmental sustainability** is well dealt with within the document;
- ii. **The proposals regarding the consolidation of town centres** for more population to live within which would increase the viability and vitality of many town and village centres;
- iii. **The requirement for cross border Spatial Plans** which is of particular relevance to the work being done by Laois County Council in conjunction with both Offaly County Council and Carlow County Council with respect to Portarlinton and Carlow Graiguecullen respectively;
- iv. The acknowledgement of the **ageing population** and the provision of services for same;
- v. the contribution of **green infrastructure** to the requirements of a growing population in terms of health and well being and environmental sustainability

## THE VISION

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Laois County Council welcomes the vision outlined in Chapter 1 of the National Planning Framework which we feel is based around worthwhile objectives. While it is implicit within the document that the growth of the regions based around the five main cities together with the identification of “Regional Growth Drivers “ on page 131 (at RSES stage) is the main thrust of the spatial vision, it is curious that that this element of the vision is not detailed upfront.

Laois County Council supports the primacy of Dublin City and the growth of it as an international city on a world stage. Its future growth is paramount to the success of the Country as a whole as it competes on an international stage for future investment and jobs.

It is disappointing that the Midlands area within the Eastern and Midland Regional Assembly (EMRA) area is apparently forgotten within the document. Much of the document gives guidance in relation to both the east and west coast but very little if any acknowledgment of the centre of the island. On the basis of the “balanced regional development” philosophy this omission is counter intuitive.

**The lack of a spatial vision for the Midlands Region within the document is seriously concerning to Laois County Council.**

## POPULATION PROJECTIONS & PORTLAOISE

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**Total Additional Population in 2040 = 475,000- 500,000 people**

**Dublin City = 265,000 people**

**Remaining EMRA Region= 235,000 people**

**Towns >10,000 population= 20-25% total growth until 2040**

*(This means for example if a town had a population of 20,000 in 2016 the maximum targeted population allocation in 2040 would be 25,000 at 25%)*

**Towns/Areas<10,000 population= 15% total growth until 2040**

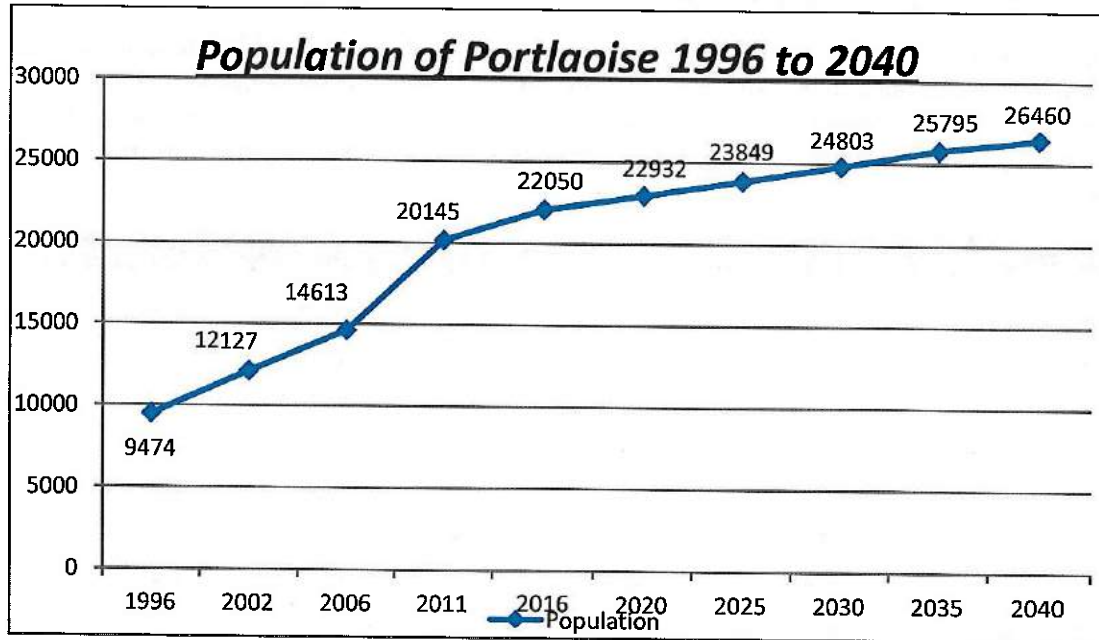
*(This means for example if a town/area had a population of 5,000 in 2016 the maximum targeted population allocation in 2040 would be 5,750 at 15%)*

**330,000 additional Jobs= location of jobs aligned to population growth**

**Dublin City= 50% of new homes on infill/brownfield sites.**

**Remaining EMRA Region= 30% of new homes on infill/brownfield sites.**

The above is a synopsis of the proposed population projections for the East / Midlands region. This confirms that the draft NPF suggests a maximum allowable growth of 25 % in Portlaoise town up to 2040. It must be noted that this 25% would only be allowed if Portlaoise is identified in the RSES process as a large regional town earmarked for increased growth.



The above table demonstrates the growth of Portlaoise town since 1996 and projects forward to 2040 based upon a 20% growth in population. Why did this growth happen in Portlaoise despite it not having any status in the NSS of 2002? One can clearly link the growth of Portlaoise (mirrored by Portarlinton town also) to the delivery of the M7/M8 Dublin to Limerick/Cork Motorways and the affordability of property prices over the period.

- Newbridge ByPass - Opened 1993
- Portlaoise Bypass - Opened 1997
- Heath/ Mayfield - Opened 2005
- M7/M8 Motorway - Opened 2010
- Castletown/Nenagh - Opened 2010

The opening of the Heath / Mayfield motorway meant that there was a motorway connection between Portlaoise & Dublin from 2005. This was a major factor in the population increase reflected in the 2006 to 2011 period. Therefore Portlaoise grew as a result of state investment particularly in the Motorway network (almost €500M invested in Motorways through Laois). The state continued to invest heavily in other infrastructure also in Laois namely:

- ✓ Water Services - Schemes such as Portlaoise Main Drainage, Portlaoise Waste Water Treatment Plant Upgrade (>\$50 M combined)
- ✓ Education Facilities - 3 new Secondary Schools in Portlaoise, 6 new Primary schools in Portlaoise
- ✓ Leisure Facilities - New Leisure centre, new playgrounds and new Library at an advanced stage of design.

Similarly improvements to the Gas supply network and the Electricity supply network including regional (Existing) and National (commenced) scale Electricity sub-stations have meant that there has been substantial state investment in Portlaoise in the last 15/20

years. This investment coupled with private sector broadband rollout providing 1GB broadband speeds in Portlaoise means that the town has the capacity to grow further and beyond what is set out in the draft NPF. There is no intention that Portlaoise would become a City in any shape or form but we must ensure that the significant state investment of almost €1Bn is maximised before larger amounts are spent on infrastructure in other parts of the Country.

There is a compelling and evidence based argument that Portlaoise should be allowed grow at a rate which will establish it as a key economic driver for the region and a prime urban centre. Portlaoise is now the largest town in the Midlands region, one of the largest towns in the EMRA region, the 11<sup>th</sup> biggest town in the Country and is larger than any town in the West / Northwest region.

Rank	Town	Population	2040 (+20%)	Diff(20%)	2040 (+25%)	Diff (25%)
1	Drogheda	40,986	49,183	8,197	51,233	10,247
2	Swords	39,248	47,098	7,850	49,060	9,812
3	Dundalk	39,004	46,805	7,801	48,755	9,751
4	Bray	32,600	39,120	6,520	40,750	8,150
5	Navan	30,173	36,208	6,035	37,716	7,543
6	Newbridge	22,742	27,290	4,548	28,428	5,686
7	<b>Portlaoise</b>	<b>22,050</b>	<b>26,460</b>	<b>4,410</b>	<b>27,563</b>	<b>5,513</b>
8	Balbriggan	21,722	26,066	4,344	27,153	5,431
9	Naas	21,393	25,672	4,279	26,741	5,348
10	Athlone	21,349	25,619	4,270	26,686	5,337
11	Mullingar	20,928	25,114	4,186	26,160	5,232
12	Celbridge	20,288	24,346	4,058	25,360	5,072
13	Greystones	18,140	21,768	3,628	22,675	4,535
14	Malahide	16,550	19,860	3,310	20,688	4,138
15	Leixlip	15,504	18,605	3,101	19,380	3,876
16	Tullamore	14,607	17,528	2,921	18,259	3,652
17	Maynooth	14,585	17,502	2,917	18,231	3,646
18	Arklow	13,163	15,796	2,633	16,454	3,291
19	Ashbourne	12,679	15,215	2,536	15,849	3,170
20	Laytown-Bettystown-Mornington	11,872	14,246	2,374	14,840	2,968
21	Wicklow	10,584	12,701	2,117	13,230	2,646
22	Skerries	10,043	12,052	2,009	12,554	2,511
23	Longford	10,008	12,010	2,002	12,510	2,502
	Sub-Total	480,218	576,262	96,044	600,273	120,055
	Regional Total for towns >10,000	480,218	576,262	96,044	600,273	120,055
	Potential Population Increase		(@20%)	96,044	(@25%)	120,055

The table above highlights the concerns of the Members Laois County Council.

*As we are part of the East / Midlands Region we are 1 of 23 towns over 10,000 population who will be effectively competing to secure some of the population growth assigned to our region for towns of population > 10,000.*

*Our recently adopted County Development Plan identifies within its core strategy a projected potential growth of 5,237 in Portlaoise in the period up to 2023. If Portlaoise does not achieve a designation as a regional scale town it may only be allocated a 20% growth which equates to 4,410 up to 2040 – almost 1,000 less than what we have recently projected for 2023.*

*This is not sustainable and cannot be accepted because if it is we will have the same as previous National Spatial Strategy, i.e. towns growing which were not identified to do so and why?.....because the infrastructure is there and people are making the choice because of connectivity and affordability to live in a location within comfortable commuting distance to their jobs (Direct train from Portarlington to Heuston Station – 39 minutes; Portlaoise to Hueston 49 minutes)*

Laois as a County somewhat bucks the National trend as it has a marked young population:

Age Range	Population
0-14	20,812
15-24	9,435
0-24	30,247
Total Population	84,697
Total % of Population Under 25	35.7%
National % of Population Under 25	33.2%

Limiting the potential of Portlaoise to grow naturally raises concerns around being able to meet the housing demand generated by the portion of this 30,247 who want to live and work in Laois during the period up to 2040.

In addition to Laois County Council having concerns regarding the methodology for distributing growth, the growth projection is considered conservative. The projected growth of one million people by 2040 does not appear to align with the ESRI report “Projections of Demand for Health Care in Ireland, 2015-2030”, which projected a million extra people by 2030.

Due to the Strategic Nature of the Plan it is critical that flexibility is built into the Plan so that if growth is greater than anticipated or if Regional Parity takes longer than envisaged by the Plan there is capacity for this growth to be accommodated in a sustainable planned manner.

The levels of growth anticipated when worked out from the overall figures for Portlaoise would greatly limit its capacity to build and grow. This may not allow for much growth within the county over 4 development plans. It is considered that a higher percentage population growth be used for the County Towns and not the 20-25% as indicated within the document. Acknowledging the potential for increased populations as per the above mentioned ESRI report would provide the necessary flexibility in this regard.

The Council commissioned a ***Public Realm Plan - Vision for a Better Town Centre*** in 2016 which has actioned a number of areas for improvement in terms of residential capacity, public amenity improvement, sustainable development on a social, economic and environmental scale.

Many of the national Strategic outcomes outlined within the NPF have already been factored into the ***Public Realm Plan - Vision for a better town centre for Portlaoise*** where the main aims are

- The Creation of a Low Carbon Town Centre
- The Delivery of a Walkable Town Centre
- The Greening of Portlaoise Town Centre
- Exposure of Cultural Heritage within Portlaoise Town Centre
- Exposure of the River Triogue as a pedestrian / cycling route
- The Reconnection of the Old and New Town
- Accommodating Living in Portlaoise Town Centre

National Policy Objective 3c which requires **30% of all new homes with the built-up envelope of existing urban settlements is welcomed** and will support our own policies and objectives as set out in the above referenced Vision Statement for Portlaoise Town 2040.

If the growth rates are applied evenly across the board for each of the larger towns within the EMRA region, there is a genuine concern that the future levels of investment in Portlaoise and Laois would be greatly curtailed.

With regard to services and health services in particular – the level of care provided in the Midland Regional Hospital would be scaled back, if one were to interpret Page 77 of the NPF. Likewise investment in water services and environmental improvements would be redirected elsewhere, etc. This is already evident in the “Hierarchy of Settlements and related Infrastructure” as detailed on page 77 whereby for example the provision of “maternity care” is associated with Cities. This is of great concern for Portlaoise where this service has been provided for a long number of years. This Hierarchy does confirm the need for an A&E Hospital in towns the size of Portlaoise which is welcomed by Laois County Council.

## **RURAL DEVELOPMENT**

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Laois County Council has a genuine fear that the manner in which this document is written will further contribute to **the demise of rural Ireland**. It is noted that Chapter 4 details how it is planned to strengthen Irelands Rural Fabric through the enhancement of unique rural settings, planning for future growth, putting in place planning and investment policies for job creation, etc.

Laois County Council is greatly concerned however that the strengthening referred to in Section 4.1 will be severely hindered by the population growth detailed for the region and the potential breakdown applied across the regions thereafter.

County Laois is located within the EMRA region which includes the Country's Capital City and main urban conglomerations for growth over the framework period of 22 years. The lack of

guidance in relation to the split of the population within the EMRA Region will be **to the detriment of the Rural Counties** and any potential investment choices that are made thereafter will be based on this document which again will impact on the future viability of rural Ireland and indeed the Midlands of the Country.

National Policy Objective 18b which introduces the requirement of providing a demonstrable economic need to live in a rural area will in our opinion be extremely prohibitive and may lead to rural housing in areas under urban influence **NOT** being available to those in most **SOCIAL** need for such housing.

We welcome the supporting policies in relation to strengthening Irelands Rural Fabric. Promoting appropriate style development at appropriate densities is something that is clearly set out within the County Development Plan –Village and Town Plans.

### **ECONOMIC POTENTIAL**

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National Policy Objective 2a of the NPF confirms that jobs growth will be aligned to occur in the locations identified for population growth.

As per our comments above this policy does not take heed of the substantial state investment already made in towns like Portlaoise which therefore has the necessary infrastructure to accommodate substantial job growth. Census 2016 identified almost 11,500 people commuting out of Laois on a daily basis to work outside the County. There should be a focused look at investment in jobs in locations such as Portlaoise which has the necessary infrastructure so to reduce the numbers commuting, reduce carbon emissions and improve the **Quality of Life** of our citizens.

We should maximise the return on existing state investment and “Bring the Jobs to the people – not the people to the jobs.”

Recent statistics show that the IDA has had little impact in Portlaoise, if this framework is adopted it is likely that there will not be any further IDA investment in the Midland Counties as there is no mention at National level of any future investment therein. There is very little if any acknowledgment of the contribution the LECP process has made to the economic and community sector despite Local Authorities investing serious time and money in the preparation of same.

County Laois has a strong linkage to the technical college at IT Carlow with 20% of the Student population being from Laois. Laois County Council has continued to develop this linkage through a number of programmes such as the REDZ programmes in Rathdowney and Portarlinton and also the potential for an outreach campus in Portlaoise. This contributes to the inter regional importance of Portlaoise as an economic driver for the EMRA / south east region.

Laois County Council in partnership with the relevant agencies such as Laois LEO, Laois Partnership, Carlow IT, etc continues to work very hard to build an economic environment conducive to local entrepreneurs through

- start up businesses supported through Laois partnership and the Local Enterprise Office (LEO)/ EI / Carlow IT;
- Community Enterprise Centres in Portlaoise, Portarlington and Mountmellick;
- Rural Enterprise Development Zones (REDZ) in Rathdowney and Portarlington and in the area of “the business of food”.

## CORE STRATEGIES

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The incorporation of **Core Strategies** within County Development Plans has provided a good evidential basis for the future population / residential requirement for the county over a plan period.

However there are some concerns with respect to the level of detail that is now required to be included in the Core Strategy- Vacancy, level of residential for an aging population, rural housing demand. The resources required to enable such detailed Core strategies requires consideration by the Department particularly for low staffed rural Counties.

Laois County Council welcomes the support given by the framework to the preparation of Joint Local Area Plans. However there is a level of confusion regarding the difference between a local area plan and an “urban area plan”.

## CONCLUSION

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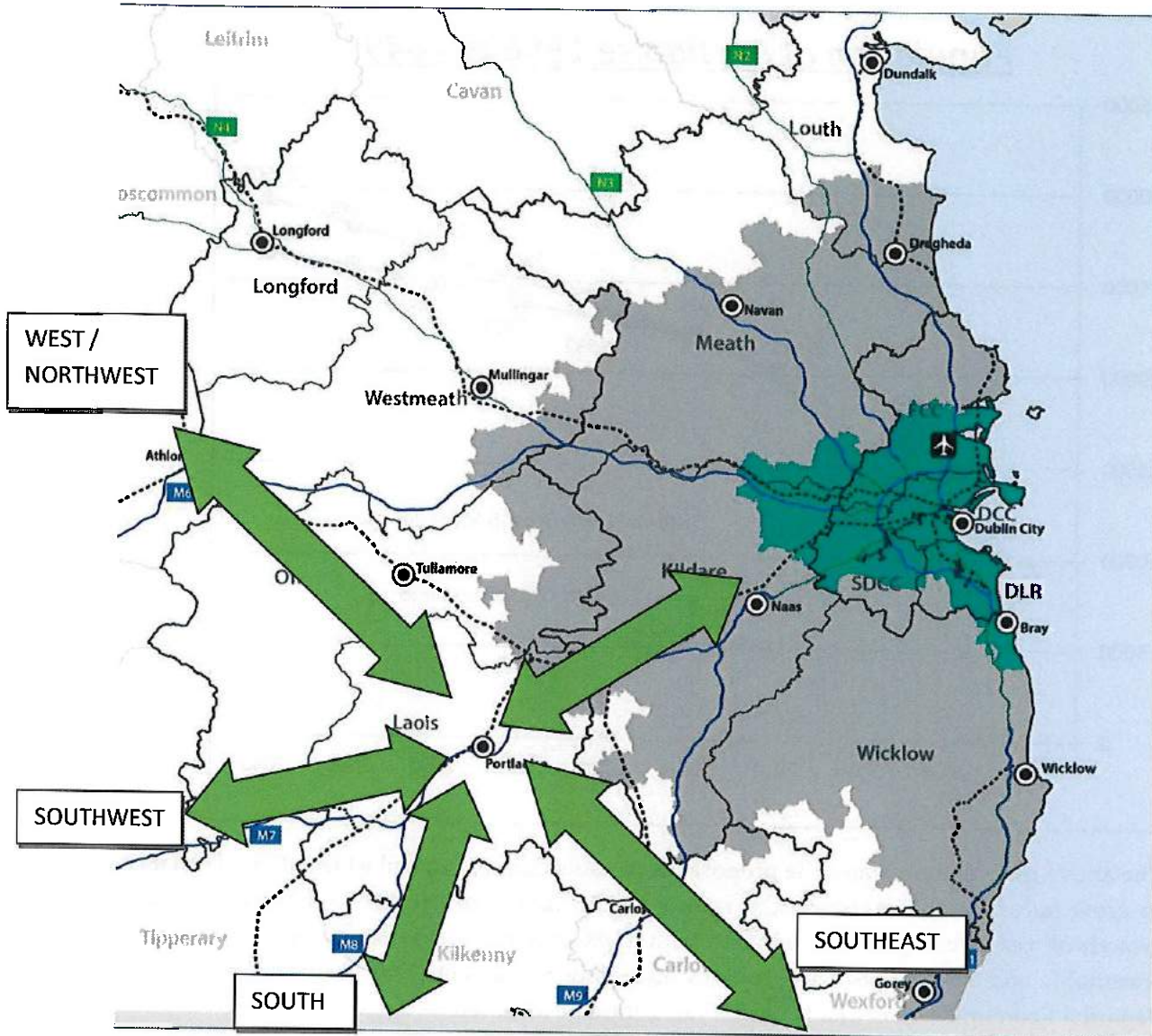
Laois County Council welcomes many of the policy objectives identified in the Draft National Planning Framework.

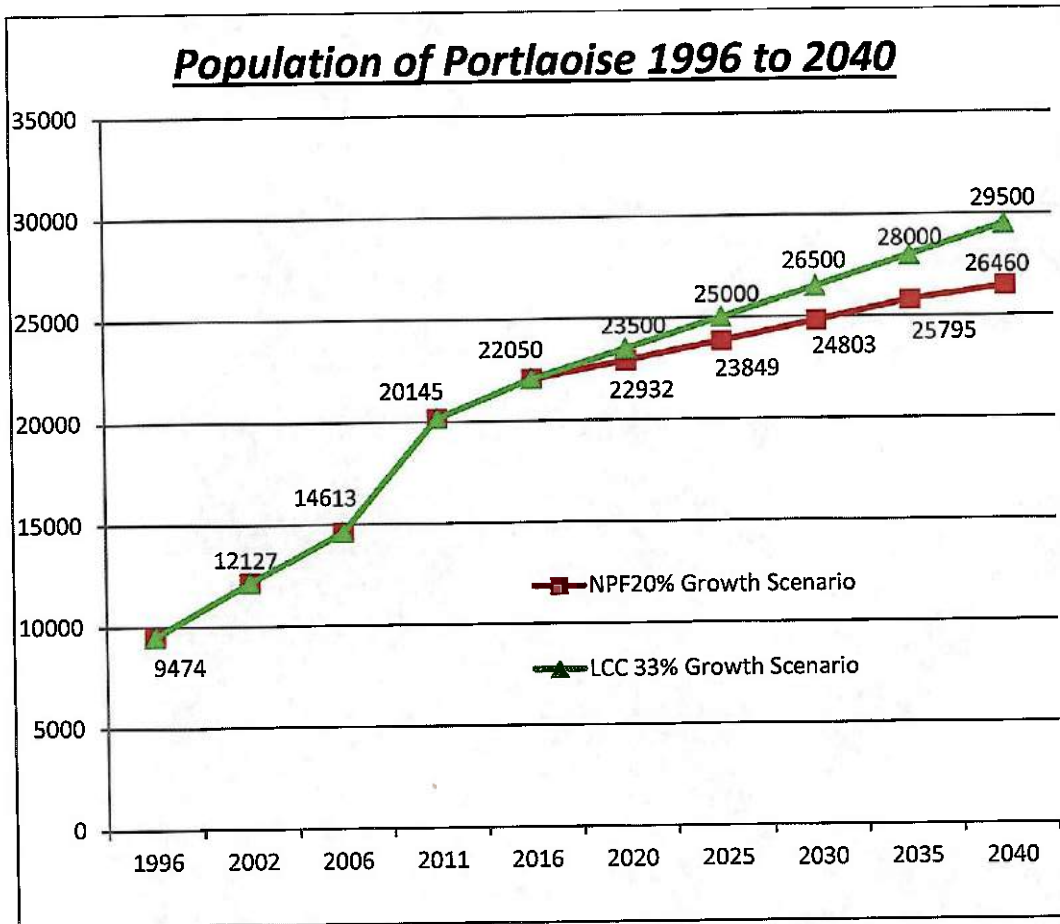
As highlighted above we have many serious concerns regarding how the proposed distribution of population growth will have a detrimental effect on our County and Portlaoise Town.

We have identified the reason for the recent growth in Portlaoise town that is linked to significant investment by the state into critical infrastructure in the County and town of Portlaoise in particular.

Rather than waste this investment we strongly recommend that the state maximises and optimises the return on this almost €1Bn of investment and allow Portlaoise to continue to grow as a town **not alone of regional importance but of inter-regional importance** and allow it to become an inter -regional economic driver due to its location at the convergence of Motorways / National Secondary Routes and National Rail lines.







The above table demonstrates the proposal from Laois County Council which allows Portlaoise to grow naturally and maximise the return on the state's investment to date. This modest growth of 33% over 24 years (compared with 232% over the previous 20 years) is more than reasonable and sustainable. This growth would allow the potential for Portlaoise as an Inter-Regional Economic Driver and Prime Urban Centre be achieved

In essence, Laois County Council would seek to have incorporated in the National Planning Framework -

- ✓ A Spatial vision that would include the Midlands which would incorporate the potential of the County Town of Portlaoise as an Inter-Regional Economic Driver and Prime Urban Centre;
- ✓ Revised population projections as per the above mentioned ESRI report would provide the necessary flexibility to plan for a sustainable future for our county towns;
- ✓ A framework that would maximise the return on existing state investment and "Bring the Jobs to the people – not the people to the jobs."
- ✓ Investment in jobs in appropriate locations outside of the cities is necessary to reduce outward commuting which will be unsustainable in the long term;

SIGNED

Padraig Fleming  
Cathaoirleach

Signed :

J. Moran  
Chief Executive

Date : 10<sup>th</sup> November 2017