

Ireland 2040 – National Planning Framework

Submission by Social Democrats November 2017

The Social Democrats welcome the opportunity to comment on the latest draft of the National Planning Framework.

We would make the following points in response to the latest proposals:

1. We welcome that the draft plan has a focus on existing urban areas and that cities, towns and villages are being targeted for population growth. Consolidation of existing areas and far more efficient land-use in these areas are key to a good and credible plan.

However, a target to have only 50% of future population growth for the cities of Dublin, Cork, Limerick, Galway and Waterford combined is far too low. Indeed, it is unrealistic. It simply won't be possible, on current projections, to limit these areas to that level of growth and any attempt to limit growth will merely push up home prices in these areas even further. Failure to recognise this will result in a plan that fails to address congestion and infrastructure deficits in these areas.

It appears that little consideration has been given to the impact of inward migration. We can't on the one-hand be trying to maximise Brexit as an opportunity for inward-investment and not at the same time be planning for further net-migration. The two go hand in hand.

The draft plan should be far more realistic on this target.

2. The emphasis on renewing existing built-up areas is welcome. However, it is hard to square this with the target of 40% of new housing to be delivered within existing built-up areas. Again, this is simply too low. It is also hard to believe this commitment without a sea-change in our relationship with land and the laws underpinning it.
3. The basis for current City, County and Local Area Plans is the National Spatial Strategy (NSS) followed by Regional Planning Guidelines. The amount of land zoned and not as yet used in areas of high demand for up to 10 years into the future is extensive and will influence where development occurs and will undermine the approach of the National Planning Framework from the outset.

Much recent development has occurred on the periphery of cities and the commuter belts surrounding Dublin and Cork will continue to grow because of the amount of zoned land available. The transition between the NSS and the NPF requires specific consideration. In addition, the infrastructural deficits in these catchments which have developed rapidly in recent decades require specific attention in order that they are both physically and socially sustainable into the future.

4. It is welcome that more balanced regional development is a specific aim of the plan. However it's a mistake not to earmark a small group of areas to act as a counter-weight to Dublin by allowing and planning for the concentration of industry and population in these areas.

The plan, as drafted, is a scatter-gun approach and a recipe for failure. It repeats the mistakes of the past by trying to placate all interests and areas and not actually taking decisions and deciding strategy based on the rational long-term interest of the country as a whole.

Balanced regional development will only happen when regions other than the Greater Dublin area gain a much greater level of self-sufficiency and economic sustainability. The draft plan lacks courage by not committing to the evaluation and identification of a small number of such bases. Trying to please everyone will lead to another failed plan.

5. The focus on addressing rural depopulation and thereby dealing with the consequences for rural businesses, public service provision, and economic development in rural areas is welcome. However, the plan should be more explicit about the need to invest in towns and villages within these rural areas and to drive population growth in existing built-up areas rather than in the countryside. It is far too cautious and ambivalent on this point. It should also be far more specific about the strategies that will be employed to help develop sustainable export-orientated enterprises in these communities that will underpin local economies.

Driving population growth within existing built-up areas in rural Ireland rather than in the countryside is key to the efficient and sustainable delivery of public services and indeed most business services. Any other approach drives up the cost-base of our public services and our economy.

The Social Democrats would also like to see more explicit commitments to practical ways in which rural depopulation might be resolved.

The plan should include a clear commitment to community banking, new regulations to ease the planning process for over-the-shop residential development in our towns

and villages, and a far bolder approach to capital investment (which we set out below).

The plan should also include a commitment to stronger legislation to deal with vacant and derelict sites, end the rates rebate on vacant town centre premises in certain circumstances, and improve the town and village scheme.

We would also urge a clearer commitment to the enforcement of out-of-town shopping centre planning guidelines, the ending of upward-only rents, and better funding for local authorities in areas such as in-fill housing, street-scape improvements, access, and shopfronts.

6. The promise of a new 10-year National Investment Plan in this plan holds no credibility. For many years now Ireland has under-invested in its infrastructure. We see this in the huge social problems and competitive disadvantages we face in terms of housing, water, public transport, broadband, retro-fitting and many other areas.

Part of the explanation for this under-investment is down to a legacy of the austerity years; part of it is down to a focus by Government on tax-cuts over investment; and part of it is down to a complete unwillingness by Government to challenge EU rules on capital investment.

The Social Democrats believe the current fiscal rules run completely contrary to Ireland's interests and counter to common-sense. Many economists, commentators and national representative bodies share this view. It is simply ridiculous that at a time of historically low interest rates, we are prevented from borrowing to make investments that will save us money in the long run. So a new 10-year National Investment Plan will of necessity fall short as it won't provide for the level of expansion required to fund the capital projects listed in this draft plan.

We would stress again that provision of DART underground is an absolutely vital piece of transport infrastructure for the country and should be given far greater prominence in this draft plan and form a centre-piece of the 10-year National Investment Plan.

We would also point out that the draft plan fails to mention, in respect of Cork, the M20 to Limerick road, the Cork North Ring Road, and any new flooding plan including the possibility of a tidal barrage. In respect of Dublin there is no specific mention of Metro West or the re-alignment of the Malahide Road and the flyover required at the Clarehall Junction both of which would unlock development lands in South Fingal.

Furthermore, the Social Democrats have concerns that a bid-based process for capital funds as briefly outlined in the plan will be open to political manipulation and favour those areas that are well-equipped to make their case or indeed who shout the loudest. There is also the danger that considerable effort and expense will be wasted in making bids.

7. In terms of planning, we believe there needs to be far more resources devoted to local area plans and local master plans. These provide planning certainty for developers and for communities and can help reduce the duration of planning applications and deal with contentious issues in advance of the formal planning process. We would repeat our call for legislation to be updated so that the drawing up of a Local Area Plan is not in itself such a prolonged and resource-intensive procedure.
8. The draft plan only commits to a “review of overall management of the development potential of State lands”. This is completely inadequate and part of the reason for the failure of Government to address the housing crisis.

The market-led approach to housing supply has failed. It is imperative that public land is used as quickly as possible to help resolve the acute housing shortage in our country. It is the only way in the short term that the State will be able to deliver thousands of social and affordable housing in mixed sustainable communities.

The Social Democrats have long argued for the creation of a new state authority, a new housing delivery agency, with an explicit remit in the area of public land-banking. Such a body is only mentioned as a possibility in this draft plan. It would be a huge mistake not to proceed with this.

9. The plan as drafted is very weak on land use. At the heart of poor planning in Ireland is the dysfunctional relationship Ireland has with land. Land is seen first and foremost as property, an investment, a commodity – and it is protected as such in our laws and in our Constitution. The productive use of land in the common good comes a very distant second.

The strategy proposes little in the way of alternatives. This is a very important piece that is missing from the draft plan.

The Social Democrats believe that Ireland needs to fundamentally change its relationship with land. The constitutional protection of land-owners has acted as a severe constraint on policy-makers and has been used as a do-minimum charter on issues such as upward-only rents, vacant site levies, rent certainty and even affordable housing.

Land use should be a key part of a 20 year plan for our country and we believe that the plan should commit to a referendum on Article 43 of the Constitution to better support the common good.

10. There should be much greater details and commitments in the plan as to how it would achieve the decarbonisation of the country and help deal with climate change. As we outline above, ambitious capital investment is key if we are to deliver improved population density and consolidation of urban areas as envisaged in the draft plan. Investing now in areas such as public transport, particularly rail, is one obvious way to address this issue but is not given enough emphasis in the plan. Such investment will save us money in the long-term and help reduce the significant EU fines we face for failing to meet our climate change targets.
11. We would like to see far more emphasis on place-making. The challenge is not just about building new homes but also about building new communities. There is a critical need to build in community infrastructure as part of new developments but also community focal points that promote strong community identity and attachment. The draft plan should also put a strong emphasis on the importance of integrating all new development with the pre-existing community.

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