

Please find below the comments and issues of concern to the Tipperary Local Community Development Committee (TLCDC) in relation to the Draft Ireland 2040 Plan. You should note that the submission and contents of the original submission by Tipperary Local Community and Development Committee to this process still stands and ought to be seriously considered in the context of the points made below and the content of the new national plan.

**Commentary:**

TLCDC would like to compliment the department on the manner in which the document is written – it is easy to read and follow, is clearly laid out and addresses most of the key areas one would expect in the context of a national development plan. There are also areas which are to be welcomed which include an attempt at building stronger city networks to balance out the over reliance on Dublin; the recognition of the role of rural areas and towns/villages and the proposal to look at ways of providing sites within villages to facilitate growth in these areas.

However, notwithstanding the above, there are a number of areas which are a cause for particular concern for the TLCDC, and particularly in the context of valuing the sort of society that we wish to build and sustain, both within urban and rural areas. The following areas below need greater clarity or a review of proposed policy and we would welcome consideration of same. There are three key concerns which are interlinked – population and investment

***1.0 Population Projections and Spatial Assignment***

The ESRI report published on 26<sup>th</sup> October 2017 projects an increase of between 14% and 23% from 2015 – 2030 which is higher than that of the Draft NPF. More importantly the proposed spatial distribution as proposed by the NPF of the expected population growth appears to go against the aim of the NPF which is to secure balanced regional development. The NPF states that the population of the Eastern and Midlands Region would at least match that of the Northern and Western and Southern Regional Assembly areas combined. This is clearly not a shift in population trends but merely reinforces what is the current scenario (and it has been acknowledged by Government and the issues papers that the current scenario is not reflective of balanced regional development).

On further drilling into the projected population figures (taking account of the targets set for the 5 cities and the % increase assigned to each region), the scenario proposed in the draft NPF represents little or no targeted growth of Tipperary's towns, villages or rural areas. Whilst it may be stated that the RSES process will dictate where the growth will occur, the level of flexibility

offered to the RSES will be severely hampered as 3 of the 5 cities are in the southern regional assembly area, and there are a number of towns >10,000. Hence any growth outside of these areas will be effectively non-existent.

Page 48 of the document lists criteria that the RSES will use in determining future targeted patterns of growth in large towns (>10000). Greater clarity is required which includes

- a. If a town is located within a defined city region catchment – what does this mean for that town – will it be allowed grow or will its growth be restricted because it is within that regional catchment (Clonmel and Waterford City is a case in point) – will those towns that are not influenced by a city region be allowed to grow at a greater rate?
- b. Scale of employment provision and net commuting flows – how will this impact the larger towns – need some clarity on the direction that this may have on their growth if the commuting flows are positive or negative

The document also (pg 68), refers to a commuter catchment area within the 5 cities and large towns (>10,000) and that rural housing in the open countryside will only be permitted in these areas where it can demonstrate a functional **economic** need. Whilst the draft NPF does not illustrate where these catchments lie from a spatial perspective, there is a fear that it could effectively ensure that areas within the Limerick city area of influence (which covers a large part of north Tipperary!) will only accommodate rural housing with an economic functional need. Similar for areas of south Tipperary that lie within the Limerick City , Waterford City and Cork City commuter catchment areas as well as the Clonmel catchment area (which is over 10,000). There is a real genuine concern here that this will restrict genuine rural housing in the vast majority of Tipperary to those with an economic functional need only – this would sound the death knell of rural communities as we know them and go completely against the objective of the NPF which is to support and enable resilient rural communities. The Draft NPF needs to look carefully at this statement as it could have significant unintended ramifications for rural communities and ensure that it (or its supporting RSES strategies) do not unintentionally restrict rural housing accommodation in areas which are not under pressure from an urban generation housing perspective and where it is in the best interest of sustainable planning to continue to support local community social linkages in order to support the wellbeing and sustainability of these local communities .

The draft plan as proposed will ensure that

- a) There continues to be an overly concentrated effort at building up Dublin at the expense of the other regions.
- b) There continues to be an overconcentration on the “economic/value for money ” model at the expense of the community/social aspects. Sustainability in its true form is about sustaining communities from an economic, social, and environmental perspective. This means that development and indeed investment needs to be informed by what type of community we wish to sustain and how will this be achieved. The only option being offered in the draft NPF is a sustainable urban community over 10,000 with little meaningful offering to those areas under 10000 population
- c) Large parts of rural counties may not be in a position to accommodate the genuine rural population in areas where they have resided for generations and which contributes to the unique interconnected and supportive fabric of rural Ireland.

## **Recommendation:**

- In relation to population targets, the Draft NPF needs to seek more appropriate wording that does not allow the RESS to be used to restrict areas from appropriate growth. It is recognised that choices have to be made, that there is a settlement hierarchy that needs to be respected but all parts of the country should be enabled and supported to grow to a level appropriate to their position on the settlement hierarchy from an employment as well as population perspective. The population figures used should be indicative for the 5 cities and towns >10,000. In addition to this and provided it is aligned with the settlement hierarchy, additional growth should be allowed to facilitate local growth of rural areas, villages and towns < 10,000. This could assist in addressing a lot of the concerns of rural areas
- In relation to the 5 cities selected, there needs to be a greater effort made to ensure that the 4 cities outside of Dublin are enabled, supported and incentivised to grow at a rate greater than Dublin if this is about genuine balanced development and the need to reduce pressure on Dublin – this will have an obvious impact on how the 10 Year Capital investment Programme is also rolled out from a spatial perspective.
- Reassess the commuter catchment rural population policy and ensure that there are no unintended impacts and that it allows for a proportionate response to accommodating the rural population in the open countryside and does not adversely affect the ability of genuine rural applicants to live in the communities in which they were reared (whilst recognising that a lot of the population near cities are urban generated and could/should be more easily accommodated in villages/towns)

## **2.0 Employment**

The provision of employment opportunities and therefore employment growth is clearly linked with population growth – when the detail for this is worked out at the RSES level, there is a real concern that this process will feel obliged to restrict growth to areas only where there is a defined population growth projection set. On page 21, reference is made that there should be a target of no more than a 30 minute commute time to work (and goods to have access to international connections within 90 minutes to their home or work base) – how will this work in practice – in Dublin in theory, one may be within a 30 minute commute time but it could still take you 1 hour to reach the destination? Also, the 30 minute commute time could end up being a criteria for where employment or housing should be located. In theory this sounds fine, but in practice, this could result in those counties which have no significant large town being excluded from significant growth opportunities or those counties which have strong public infrastructure gaining at the expense of those that do not – thereby exacerbating the inequalities.

In addition, there are towns, that are not defined as “large towns” but which are within the commuting influence of a city (or even large town) – will they be prevented from using their advantage to attract and support employment uses in their town where there can be a contra flow of commuters? It is recommended that the document is clear that they should not be restricted.

Progress has been made on expanding the potential role of rural areas towards non traditional economic activity and this is to be welcomed. However, greater clarity in the document is required around this to ensure that the RSES do not take a very conservative and restrictive take on same

**Recommendation:**

- A statement needs to be included that employment growth, where it is appropriate, can be accommodated in appropriately sized settlements having regard to the working population catchment within a 30-45min minute drive and that it is not just confined to the large cities/large towns
- A further statement needs to be included which allows for home working in rural areas; that supports initiatives to develop appropriately sized enterprise centres/hubs in rural villages and that is also open to looking at the appropriate uses of abandoned commercial buildings for enterprise activity in rural areas where it meets all necessary technical requirements

**3.0 Investment**

The most significant concern of TLCDC revolves around the allocation and distribution of the capital investment fund. There needs to be an explicit statement outlining how it will be applied. If it is applied in line with the distribution of the projected population target, then the TLCDC would object very strongly as it would effectively mean that minimal if any capital investment would go into areas outside of the 5 key cities, thereby limiting if not preventing growth at any level. The NPF needs to indicate what proportion of the investment fund will be allocated to a) 5 cities; b) large towns and c) remaining areas and in particular, there should be a greater proportionate spend of such funds allocated to the northern/western and southern regional assembly areas over the Midland and east regional area if the genuine objective is to rebalance the growth of the country.

**Recommendation:**

- Need to ensure there is clarity in the final document on the proportionate breakdown of where the national capital investment fund is targeted from a city/urban; rural and regional perspective
- The document needs to specifically include for provision of the N24 so that the connectivity between Waterford, Limerick and Cork is provided for and provides the platform for greater and more sustainable growth