

Submission by Cllr Marie Murphy, Clonmel Municipal District, Tipperary County Council.

Ireland 2040 – Our Plan Draft National Planning Framework

Introduction

The Draft National Planning Framework has identified that the development of our Regional Cities, is critical in complementing the role of Dublin, whilst providing effective regional development and a counter pole to Dublin's growth. The cities of Limerick, Waterford and Cork in the Southern Region will be instrumental in this new vision as each are major centres in their own right. A key issue for growth will be the ability of these City Regions to connect with each other in support of the economic growth of the Southern Region, and with the major international access ports and airports.

Upgrade of the N24

The upgrade of the N24 is vital, particularly when Brexit is taken into account. There has to be proper infrastructure to provide connectivity from the South East ports of Rosslare and Belview and Waterford Airport to Shannon Airport and the West of Ireland. While previous proposals have been developed to up-grade the N24 route, no proposal is currently part of the national capital road investment programme. In my opinion this is a major concern as it is clear that the current roads transport network is not fit for purpose. The N24, despite its importance to the region, effectively it is well past its sell by date because journey times are slow, it is sub-standard in its design and alignment and is congested where it routed through a number of towns and villages including Carrick on Suir, Clonmel and Tipperary Town.

In the Government's 2013 National Ports Policy, ports which handle commercial freight were categorised into Ports of National Significance (Tier 1), which includes Dublin Port Company, the Port of Cork Company and Shannon Foynes Port Company and Ports of National Significance (Tier 2), which includes Port of Waterford Company (Belview) and Rosslare Europort. With the presence of 4 of the 5 Ports of National Significance in the Southern Region the provision of high quality linkages between them is strategically important. Each of the 4 ports has substantial expansion plans and there is the potential for these ports to make a

major contribution to the economic development of the Country. Direct access from Ireland to mainland Europe will be vital when Brexit is finalised and I believe that this road upgrade is a critical piece of infrastructure in light of what's coming down the tracks. As far as I'm concerned, it is therefore imperative, that the upgrade of the N24 to the M24 is included in the 10 year Capital Investment Plan

Connectivity

We hear on a regular basis about the railways and particular lines that are not profitable. In my opinion there has to be investment in the Development of Inter-City Rail lines with emphasis on the Limerick to Waterford line and the reopening of the Waterford Rosslare line.

Planning for Diverse Rural Places

Tipperary County Council's submission in March 2017 outlined the importance of a national policy response to protect, enhance and develop villages in rural areas. Many of the actions set out in the Draft NPF are to be welcomed, including the programme for new towns and village. However the Draft Plan lacks an overall long term sustainable rural settlement strategy, whereby residential development in smaller towns, villages and the open countryside are considered collectively.

The Draft Plan states that the rural areas which do not cater for urban or suburban type development, however little or no policy guidance is provided on the assessment of single houses. The final NPF needs to give clarity on the importance of land use considerations in the assessment of housing need – protection of tourism assets, areas of natural beauty, roads infrastructures etc.

Clarity is needed on how the Housing Demand Need Assessment would be undertaken and implemented. I have concerns that this approach could lead to a displacement of local communities. In my opinion, the national policy objectives in relation to rural housing is inadequate with particular respect to the manner in which it addresses the issue of the continuing need for housing provision for people to live and work in Ireland's rural area. The uncertainty which has been created through the Draft NPF policy objectives on this issue needs to be clarified and resolved.

Population Growth

I note that the ESRI was commissioned to prepare population projections to inform the spatial growth of our country over the next 20 years. However, I believe from my research, that overall national growth projections could be too low and do not take into account likely migration into the country. This view is supported by the ESRI report which was published on the 26th October 2017. This report, entitled "Projections of demand for healthcare in Ireland 2015 – 2030" which projects an increase in population by between 14% (0.64 million) and 23% (1.08 million) from 2015 to 2030. In the preparation of the final document, the National Planning Framework needs to undertake a comprehensive re-examination and re-distribution of the national and regional population growth projections on this basis.

The Draft NPF under National Policy Objective (NPO) 1a indicates that the population of the Eastern and Midlands Region would at least match that of the Northern and Western and Southern Region Assembly areas combined. It is stated that “targeting this pattern is significant because it represents a shift in population trends”. Tipperary County Council submits, with reference to the trend in the most recent census, that this will not represent a shift in population patterns. When the Framework is analysed further in the context of the application of projected population growth in County Tipperary, it represents little or no targeted growth of Tipperary’s towns, villages and rural areas over the lifetime of the Plan. If we are to deliver meaningful balanced regional development and to support the viability of rural communities, the population distribution must be re-examined to achieve balanced regional development.

Urban Structure: Towns

Tipperary is a vast county from the Waterford/Kilkenny border in the South East to the Galway border in the North West. Clonmel has the required population as per the draft NPF, but taking the size of the county into account, Nenagh which is just under the population requirements, when the hinterland is included and is my considered opinion that Clonmel and Nenagh should both be in the same classification. Tipperary has a very strong network of large towns, each of which has an ambition to grow and develop, attract business and tourists, and provide for new sustainable communities. The Draft NPF defines the role of rural towns as “local drivers for their surrounding areas” and focuses National Policy objectives only on proportional growth and addressing decline. In this regard, the Draft NPF does not provide a spatial framework to assist stakeholders in achieving their ambitions or local authorities in delivering for their communities.

The Draft NPF rather than identifying the socio-economic inter-relationship and connections between cities, towns and rural areas, has sought to draw a distinction between urban areas above 10,000 people and the remainder of the country. In this respect, the NPF does not recognise the role and function of large towns (which may be below this threshold) in the economic, social and cultural development of large parts of our Country. These towns have the ability to be economic drivers within their regions, counties and municipal districts, offering a high quality of life and strong support structure to their communities and businesses. In addition, significant public investment has been made in our towns over the past decades in infrastructure, education, health, community and social services. Therefore, towns have the capacity for growth and development and offer a unique offering to new residents.

The NPF should take reference from the CEDRA Report “Energising Ireland’s Rural Economy” in defining large towns i.e. those above 5,000 people. NPO 7 should be amended to acknowledge this distinct category and policy provision should be included which supports large scale economic development, job creation and strong residential growth. The NPF should include national policy provision to support town centre governance structures and supports for towns to market and brand their unique attributes.

Planning and Investment to support Job Creation

I acknowledge the recognition of the diversity and potential of the rural economy, in terms of SMEs, agri-food, tourism and the circular economy. Having regard to the Government National Policy Statement on the bio-economy, it is recommended that the Circular Economy

section is strengthened, and the requirement for a national hub and research and development facility is identified in the document.

The NPF should identify/support the development of Lisheen Mine (identified as a 'European Model Demonstrator Region for the Bio-Economy') as a national research and development hub for the bio-economy. The NPF should recognise that rural areas are working landscapes and Strategic Employment Zones based on natural resources/brownfield industrial sites should be considered and identified at a regional level.

Climate Change, Energy Policy and Planning

Climate Change and the transition to a low carbon economy are key global challenges of our times and effective spatial planning and development should be at the heart of the solution. I would urge the Department to include a stronger national policy response to promote renewable energies and ensure that climate change and energy considerations become part of all spatial planning processes. Tipperary County Council has noted that the recently published Draft National Adaption Framework has stated that the NPF and Local Development Plans must be responsive to ensure that climate change considerations are fully incorporated into plan making and national guidance is essential.

I welcome the fact that County Tipperary's leadership in Climate Change and Renewable Energy has been recognised in the Draft NPF. Tipperary can become a pilot and best practice location for the spatial planning for climate action, planning for energy production, the bio-economy, rural development and the creation of jobs in this sector. Renewable energy technologies are developing at speed and in all sectors (wind, bio-mass, solar etc.), a national strategy supported by planning guidelines, is needed to maximise and facilitate the opportunities over the next 20 years. I believe that the forthcoming Renewable Electricity Policy and Development Framework, given its narrow focus will not provide the spatial direction needed at a regional and local level.

Conclusion

The Draft National Planning Framework core objective of delivering balanced regional development and prosperity for all must be achieved. The key elements of putting in place a new national and regional development strategy for Ireland has focus on the growth of urban areas but does not make adequate provision for our rural communities. It is clear that the "business as usual" model will be perpetuated should the Draft NPF as presented be adopted by the Oireachtas. As stated in the previous submission in March 2017 by Tipperary County Council, I together with my council colleagues believe that Tipperary County, it's communities, business and voluntary organisations have the vision, capacity, track record and drive to contribute positively to achieving the ambitions of Ireland 2040.

I am grateful for the opportunity to make this submission and I would hope that notice is taken in the final NPF as it will be the 'bible' for the next 20+ years.

Yours sincerely

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