



Tionól Reigiúnach Oirthir agus Lár-Tíre Eastern and Midland Regional Assembly

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Submission on the National Planning Framework: Ireland 2040 Our Plan Issues and Choices

This submission on National Planning Framework: Ireland 2040 Our Plan Issues and Choices, has been prepared by the three Strategic Planning Area Committees and approved by the Eastern and Midland Regional Assembly at the meeting on 10th March, 2017.

Introduction

The Regional Assembly is served by three Strategic Planning Area Committees, namely Dublin, Eastern and the Midland. These three committees met in February to discuss the Issues and Choices documents that were published as part of this initial phase of the preparation of the National Planning Framework. The comments, observations and opinions of the elected members of these committees have formed the content of this submission, which was approved by the full Assembly.

This submission primarily addresses the Choices and Issues paper as presented for public consultation and includes additional commentary around a vision for the region and other matters for consideration in the formulation of the National Planning Framework.

Issues and Choices

Peoples Health and Wellbeing

The region contains some of the fastest growing communities in the country, with increasing demand for housing, access to a quality environment, local services and infrastructure. The region also contains an extensive rural hinterland with towns and villages that have a good quality environment but with increasing problems around access to employment, population decline and social isolation. For many people across the region, long distance car based commuting has now become the norm.

The NPF urgently needs to address the lifestyle costs of commuting and the serious impacts both on people's health and well-being and on the environment. There is a need for more local employment opportunities, with a particular challenge to address the loss of jobs in the Midlands counties. Solutions may also include incentives for home working and co-working hubs, for example in public buildings such as libraries.

Reducing the reliance on private cars for commuting will require a combination of strategic public transport, car sharing and active travel (walking and cycling) solutions. Shared cars are suitable for all urban areas, from small settlements to high density urban areas. The biggest barriers to active travel are lack of finance and quality of infrastructure. The provision of high quality inter-urban cycling links and cycle lanes which are separate from road infrastructure will enhance urban quality and bring added health benefits. These solutions need to be financed properly as part of a step change away from investment in travel by private car. Incentives for workplaces to provide cycling infrastructure could include rates relief.

Well-being requires a holistic 'Live work and play' approach with increased funding and access to the natural environment and green space for physical and mental health benefits. There needs to be a focus on community health and preventative health, also considering the needs of future generations and age-friendly services. Urban areas need to allow for private housing retirement schemes, close to services, to cater for aging population. There may also be potential for clustered retirement developments at village scale.

Place Making

Cities

Cities are crucial to drive economic growth and competitiveness. Placemaking is vital to create attractive urban centres where people want to live, businesses want to locate and to offer a good visitor experience. There is a need to promote greater design quality through the use of development standards that seek to enhance the attractiveness of urban spaces, including a requirement for the use of local materials to create a unique sense of place.

There is some concern among members about the primary focus on the second-tier regional cities, at the cost of the capital city and the Eastern Midlands Region as a whole. This lack of focus is of particular concern, when considering the urgent need to address the legacy of NSS failure and the serious impact on people's quality of life. Where commuter driven rapid housing development occurred but did not come in tandem with the benefit of local jobs, services or amenities, there is a clear need to plan for the people that are already living in our region and also to plan ahead for natural increase of this young and diverse population - where will the next generation live and work?

Notwithstanding the concern around the lack of focus on Dublin, there is support for the selection of designated growth settlements with the potential to achieve enough critical mass to drive regional development, create a strong axis with Dublin and enhance inter regional potential. In particular mechanisms should be investigated as to how the Midlands can benefit from its relationship with Dublin, for example the Togher designation in Laois, which aimed to establish linkages with Dublin Port. To help frame a regional approach, the NPF should offer guidance and suggested criteria to inform settlement designation e.g. land availability, high speed transport, distance to national airport/port, infrastructure capacity etc. Investment and commitment will also be needed to ensure anticipated growth and associated benefits occur in selected settlements.

The NPF does not address the 'Urban' as separate from the 'Cities' or 'Rural' context. In this regard, the elected members considered all urban settlements including towns and villages as well as cities under the theme of place making. The Eastern and Midlands region has a number of attractive towns and villages with strong heritage and natural landscape but with issues around out of county employment and retail 'leakage'. While the region is relatively affluent, there is increasing social inequality in both rural and urban areas including Dublin, which is characterised by highly contrasting areas of affluence and disadvantage.

Many of the urban settlements in the region have infrastructure problems due to rapidly growing demand, which are impacting on their quality of place. The Greater Dublin Area is experiencing severe infrastructure blockages around housing, water, wastewater and integrated transportation, which is also having an impact on competitiveness. Integrated transport should improve accessibility between all cities, not just to Dublin. There is need to improve connectivity, particularly the road network, to allow the Midlands to effectively interact with the remainder of the region and indeed the other regions, in this regard consideration should be given to extending the M4 from Mullingar to Roosky.

The issue of vacant, underutilised and derelict properties are having a detrimental impact on urban centres. Policy measures are needed to identify and incentivise the reuse of vacant sites and buildings with a stronger active land management role for Local Authorities in delivering strategic serviced sites for development in urban areas, with targeted incentives, (to mitigate against additional building costs compared to greenfield) and to streamline the development of brownfield and derelict sites and promote living over the shops opportunity. In this regard, the members note the presentation to the Oireachtas Housing Committee's meeting of 1st February 2017 by Dr Lorcan Sirr, which addresses the issue of vacant housing, derelict sites and underused spaces.

The impact of online shopping and retail 'leakage' to out of town centres and motorway service stations is also having a serious negative impact on the vitality and viability of our towns and villages. There needs to be a coordinated approach in addressing this by linking macro to micro policies; from measuring the economic cost of free parking, to health checks in Local Area Plans and integrating planning into works programmes and public realm improvement schemes.

There is a need to promote more consolidation and densification, particularly in Dublin to achieve a more compact city, support population growth and avoid generating further sprawl. The issue of density also needs to be decoupled from the debate around building heights and refocused on achieving increased urban densities using innovative building typologies that recognise the diverse needs of different demographics from a young mobile workforce in the inner city to family living in the suburbs. There is potential to use statutory instruments to increase urban densities to provide critical mass and free up green space to create more live able walkable cities. There is support for the designation of a Metropolitan Area boundary as a policy tool to promote consolidation of the metropolitan area of Dublin, as demonstrated in the current Regional Planning Guidelines for the Greater Dublin Area.

The need to have clustered development in rural areas is also promoted as an alternative to one off rural housing, with historical precedent such as the clachán rural settlements. Plan led village scale development can foster community building and make infrastructure and service provision more viable in rural areas.

Opportunities for Our Regions

It is considered in terms of developing opportunities for the Eastern and Midland Region, that one of the first issues to highlight is the task associated with cohesive planning resulting from the diverse nature of Eastern and Midland Region. There is an incoherence of regional boundaries with the significant variation between the administrative regions of the Regional Assemblies, HSC, IDA Gardai etc The NPF should aim for better alignment between the boundaries of different agencies to achieve effective regional development. This has brought its own challenges, but fits well with the NPF Issues and Choices Paper which outlines that a more tailored approach to regional development requires an acknowledgement that in some cases building regional resilience is a priority, as opposed to an expectancy of high levels of growth everywhere. Despite this regional variation, there exists an identified common requirement to seek mechanisms to address deprivation and social inequality, both urban and rural, throughout the Region.

The eastern part of the country is highly likely to continue to attract significant investment as employers want to be strategically located in proximity to the capital city and its labour markets, Dublin Port and Airport. Whilst Dublin is recognised as the primary city and driver for the Region, in order to realise 'Effective Regional Development' the suggestion of a city within the Midlands Strategic Planning Area, as a regional city driver, is welcome. It is considered that this will help to deliver the determinants of regional growth that are required such as human capital, critical mass of population, density, frequency of large urban centres and infrastructure.

This should not be done, however, at the expense of the county towns and settlements throughout the Midlands SPA that play important and key roles for the people of the Midlands. In addition, any such designation should not be used as a means to overlook the necessary mechanisms needed throughout the remainder of the Midlands to ensure its resilience. Central to this is the need to foster environments that allow for jobs and economic progress.

The Eastern and Midland Region is framed by numerous settlements that are linked to Dublin and located on transport nodes, such as the motorway networks or train lines. For some of these settlements, such as Swords, there is an overdependence on car based development whilst others experience similar and alternative challenges. In this regard there is need to firstly recognise the important supportive role for Dublin that these settlements provide and also to set out criteria and analysis to promote sustainable forms of development for these satellite towns. To become economically competitive at a macro level, there is a need to address infrastructure and housing blockages and assess potential for growth along key transport nodes and corridors. This includes enhanced integrated public transport infrastructure such as Metro North.

A key opportunity for the region lies in maintaining and enhancing its attractiveness of place. This includes its culture and heritage, access to the coast, mountains, waterways, greenways etc. There is a need to devise mechanisms that better harness the natural assets and amenities of the Region in order to develop tourism infrastructure. In this regard, Dublin can act as the national gateway for Tourism in Ireland to the vast tourism potential associated with the Eastern and Midlands counties.

The Potential of Rural Ireland

In order to effectively realise rural potential, it is considered that a clear definition as to what is exactly covered under the umbrella of 'Rural Ireland' for the purposes of the NPF would be extremely beneficial. There is also a need, at national level, to address rural decline and ways of managing spatial development in places that have not been selected for growth. This is relevant in parts of the Eastern and Midlands that are outside the influence of Dublin generated growth. This may require a greater acceptance that not all areas can grow and there may be a need to plan for contraction or population decline in some places, and an economic strategy to help local communities shift to more tourism and natural asset based economies.

In protecting and enhancing the unique identity of rural Ireland, further mechanisms at a national level to and provide alternatives to individual houses in the countryside would be beneficial. This includes national policy direction and the introduction of mechanisms aimed at enhancing the vitality and viability of rural towns and villages through dealing with issues such as parking, retailing, vacancy, closure of services and infrastructure provision. Mechanisms to make serviced one-off sites available within settlement centres and perhaps the provision of incentives to address higher building costs on brownfield/urban sites could assist in this regard.

There is a need to ensure the protection of the agriculture industry and the rural landscape that supports it. This includes recognising the value of horticultural land and addressing development pressures and the potential impact that Brexit may have on food exports throughout the region.

Ireland in All Ireland Context

Strong synergies exist between the EMRA area and Northern Ireland. In particular the Dublin-Belfast Economic Corridor is one such direct synergy with other indirect synergies found throughout the region based on shared interests such as agriculture or tourism for instance. The NPF presents an ideal opportunity to establish a framework to build closer and stronger relations, formalise interactions such as the Dublin-Belfast axis and facilitate high speed transport connectivity along this route.

Concern exists as to the impact that Brexit may have on these relationships and it is considered that evidence based measures should be considered in order to mitigate against any associated negative consequences. Of particular concern is the potential impact on the agriculture and food production industry that is relied upon by so many throughout the region.

Marine

There is a need to harness the potential of the marine resources within the region, which encompasses the Irish and Celtic Seas including the coastline, islands and offshore in tandem with land-based resources. Fishing is a substantial sub-sector in Dublin, with Howth being one of six national Fishery Harbour Centers. Dublin Bay is a key natural resource and there is huge potential to develop the tourism and brand potential of the Dublin Bay Biosphere designation, for example wildlife tours and branded marine products.

Consideration should be given to the use of natural resources for smart green economy and renewable energy projects, for example off shore windfarms, subject to protection of the environment and amenity. With some of the region's Ports coming into Local Authority ownership there are potential development opportunities at Wicklow, Arklow, Drogheda, Dundalk and Bremore Ports. There is also a need to work with Waterways Ireland and look for more investment in inland waterways to unlock their tourism and transport potential.

Ireland's Unique Environment- Sustainability

The Eastern and Midland Region has over the years provided a significant amount of renewable energy developments to the benefit of the Country. To date these developments have materialised in an uncoordinated manner and it is considered that national guidance on the issue is urgently required. The NPF should set the framework for the development of a renewable energy policy that considers the protection of landscape character and residential amenities where appropriate and explores the potential of a range of renewable technology options including solar and micro generation in addition to large scale wind farms.

There is a need to capture community gain in a more meaningful way so that communities impacted by energy developments can appropriately benefit from such developments, in a manner that facilitates real change as opposed to delivering 'flower pot funds'. It is considered that the Midlands

in particular has provided a significant share of renewable energy production for the Country, with minimum payback to communities and extremely limited job opportunities associated with wind or solar farms. Consideration should also be given to decentralisation of the grid to allow local access to cater for a more community led approach to energy development.

Mechanisms are needed to allow for in built flexibility around future proofing for technological advances for example by 2040 there may be different transport models such as car sharing, electric vehicles or self-driving cars. In addition, Climate Action is required, particularly on reducing transport emissions. In this regard, suggestions include ensuring that the Strategic Environmental Assessment of the NPF includes quantified emissions projections as well as developing the capacity for regional carbon emissions projections in the RSES, relying on the EPA's expertise and that of Codema and other local authority level experts.

There is also the requirement to address the nature of future housing provision, including the provenance of building materials and mechanisms to balance the building costs associated with providing energy efficient buildings.

Infrastructure

A strong culture of centralised funding and weak metropolitan structures has led to fragmented governance, uncoordinated spatial planning and poor infrastructure provision in the Greater Dublin Area. While the Eastern commuter belt counties in particular delivered significant levels of housing, this population growth didn't always bring additional benefits of increased employment, amenity or investment. Likewise, some parts of the Midlands saw large population growth without the complementary levels of infrastructure investment.

Infrastructure providers need to be aligned to the planning process, with whole of government buy in for policy driven investment where it is needed. Ireland 2040 will need to provide a clear framework for prioritising strategic and social infrastructure investment in future Capital Investment Plans. There is a need to ensure wide agency buy in, and to address areas where control has been eroded for example funding for Irish Water and cuts to roads budgets.

In order for the region to realise its potential, there is a need to optimise investment in the rail network with a study of capacity to support future strategic growth along corridors. The Metro North, Dart Interconnector and Metro West are key pieces of public transport infrastructure to support the future development potential of Dublin City, Fingal, South Dublin and Dún Laoghaire Rathdown. The importance of the bus network is acknowledged, but more public funding will be needed to support services to in-between stops if more commercially viable point to point routes are licensed to private operators. There is potential to work with private operators to develop long distance express bus solutions that feed into Park & Ride at public transport nodes.

Key road infrastructure for the Eastern and Midland counties includes the Leinster Outer Orbital route, which needs to be interconnected at Arklow and to the South Port Dublin access route. It is likely that congestion charges will be used to rationalize road space in the future. To minimise that micro cost, we should be trying to reduce demand in the wrong places by investment in more sustainable transport links. In this regard, public transport routes and timetabled connections in the Eastern and Midland counties need to be developed to enable sustainable development in these counties, facilitating travel not just to Dublin City Centre but also other regional destinations by non-radial trips.

This network-based approach is essential to address severe road capacity issues on the M50 and connecting radial national routes in a manner which contributes to national policies of modal shift and climate protection. Further investment in walking and cycling infrastructure will be key to improving the livability of towns, villages and cities.

There is a growing recognition of the need to sustain Ireland's green infrastructure including our coast, rivers and wetlands, farmland, woodlands, parks and open spaces and nature conservation areas. Green infrastructure can provide natural solutions and cost effective alternatives to physical or 'grey' infrastructure and should be fully integrated into all levels of spatial planning and development policy. In this regard the NPF should set the framework for the identification and mapping of a strategic Green Infrastructure network as a key 'natural capital' resource, which can be strategically planned to deliver a range of eco system services such as the protection of environmental quality and biodiversity, human health and recreation, flood alleviation and climate mitigation and adaption.

Broadband and ICT connectivity will be key to the development of both rural and urban areas. There should be a requirement that during the provision of new physical infrastructure (including green infrastructure corridors) provision should be made for broadband infrastructure. The provision of telecommunications infrastructure needs to consider the protection of visual and residential amenities and explore opportunities for undergrounding powerlines where appropriate.

The Midlands has experienced difficulties in utility provision, for example gas provision in Longford. Additional Water and Wastewater capacities are required to serve strategic sites but they also need to be available for exceptional circumstances e.g. Center Parcs.

Enabling the Vision- Implementing the NPF

The NPF needs to lead with a clear vision for Ireland 2040 and beyond. The vision should be future orientated and seek to achieve balance between the need to be flexible and responsive to future technology, social, cultural or political change and the need for planning certainty and regulation. It should be underpinned by an effective strategic environmental assessment and economic

strategy. In tandem with this is the need for the NPF to be placed on a statutory basis and clarity provided with regard to framing the spatial vision.

There is a need to learn from lessons of the past – the NSS did not realise its potential as it was unsuccessful in matching its stated population centres with where the market delivered employment. While recognising the need for regional equity, there is a clear need to focus a significant amount of growth to where the most people can benefit and where services can be provided. In this regard there is concern about the lack of focus in the NPF on the potential of the Eastern and Midlands region within the dominant narrative of a ‘step change’ directing future growth away from Dublin and about the lack of economic strategy underpinning such a significant policy shift.

The Eastern and Midland counties are home to nearly half the country’s population and there needs to be a stronger recognition of the existing and future needs of these people who are already living and working in the region. Key to this will be the enhancement of communities, employment opportunities and integrated transportation to reduce long commuting times, which are having a serious impact on quality of life in the region.

There also needs to be a better understanding where actual investment and growth trends are happening to inform where future sustainable growth should happen. The inclusion of economic analysis would be very beneficial along with a strategy for job creation, sectoral strengths and strategic locations for economic development up to 2040. This will require a strong evidence base, expert advice and the development of realistic scenarios on which to base decision making and inform settlement designation. There is also a need for more information on population projections and migration patterns, housing, transport, retail, environment, agriculture etc.

There is a strong likelihood that Dublin, as the only city region of metropolitan scale, will continue to attract talent and investment, which is likely to generate continued growth in the wider region. It is suggested that NPF policies should not seek to constrain development, thus potentially hindering national economic growth, but rather seek to harness the economic potential of all regions. This will set the framework for the development of regional propositions that support the NPF vision and complement rather than compete with each other, by playing to local economic strengths, branding, natural assets and human capital.

The key to enabling this vision is the provision of the necessary fiscal incentives or stimulants needed for delivery. It is considered that funding will clearly follow policy. In order to ensure that the right financial and funding decisions are made, including capital investment priorities, a detailed rationale of policy decisions are required. In this regard the NPF needs to recognise and address areas of potential policy conflict, for example policies for investment in road infrastructure may need to be balanced against policies that seek to promote sustainable travel and a transition to a low carbon future.

Implementation could be assisted through enhanced metropolitan level governance. Furthermore Local Authorities, in particular those dependent on a low rate base for match funding, require mechanisms to be put in place to remedy this, as it acts as a barrier to local authorities attempting to help themselves.

The Regional Assembly welcomes the opportunity to show leadership in creating a vision for the region coupled with a defined stronger role for implementation and to support the alignment of policy with EU funding opportunities. It is considered that this role could be strengthened through continued and greater coordination with Chief Executives to drive the process.

Regards,

A handwritten signature in black ink, appearing to be 'J. Conway', written in a cursive style.

Jim Conway
Director
Eastern and Midland Regional Assembly
15th March 2017