

NPF Submissions,  
Forward Planning Section,  
Department of Housing, Planning,  
Community and Local Government,  
Custom House,  
Dublin D01 W6X0

A chara,

I would like to submit the following brief comments on the National Planning Framework.

I do so having pursued this issue through various parliamentary facilities and having campaigned on the need to broaden the scope of the NPF's predecessor, the National Spatial Strategy.

I welcome the fact that The National Planning Framework will act as the strategic planning context for relevant Government policies and investment in housing, water services, transport, communications, energy, health and education infrastructure.

I do note however that the process is set to involve preparation by the three new Regional Assemblies of their new regional spatial and economic strategies, and for planning authorities and An Bord Pleanála.

These Regional Authorities, which emerged as part of the Government's reform of local government as set out in Putting People First- Action Programme for Effective Local Government and the Local Government Reform Act 2014 provided for the existing 8 regional authorities and 2 regional assemblies to be replaced by 3 new regional assemblies.

With respect to my own electoral area this relates to The Southern Regional Assembly which has 27 members and covers the county councils of Carlow, Clare, Cork, Kerry, Kilkenny, Tipperary and Wexford, the city council of Cork, and the city and county councils of Limerick and Waterford.

My views on this matter are tempered by the fact that I have consistently opposed the radical democratic deficit created by the abolition of Town and Borough Councils.

This has undermined the capacity for genuine local input into any future planning process and has transferred it to a more centralised and distant regional format.

While the stated aim of the new assemblies is to co-ordinate, promote or support strategic planning and sustainable development and promote effectiveness in local government and public services, I remain unconvinced that the models of regional representation we are creating are the most effective means to achieve these outcomes.

I would advocate a return to more local forms of representation in terms of strategic planning and sustainable developments. Continuing the move toward further and further centralisation in all aspects of strategy will ultimately be in my view counterproductive.

I want to welcome Minister Coveney's previous commitment to me in December of 2016 that the process for creating the NPF would involve consulting with other Departments and agencies in recognition of the whole-of-Government approach and the challenges and opportunities that exist to better align place making, investment priorities, employment and environmental strategies.

This approach it must be said is characteristically absent from almost all government approaches to rural Ireland that have emerged in the last number of years.

Aspirations are made, commitments are given and yet Departments do not seem to work in cooperation with one another.

For example I have recently suggested to the Minister for Finance that he create a cross-departmental approach to the issue of so called 'vulture fund' activity in rural Ireland. The problems of home finance and the sustainability of farm land and the agri-sector are increasingly and intimately linked. We require coordinated forward planning on this issue.

I want also to welcome Minister Coveney's comments that If we want our country to be the best it can be, we must ensure that development and services are located where all of our people can best be served. In other words, that the right development can take place in the right places, at the right time.

I agree wholeheartedly with this sentiment as it speaks to the urgent need to develop, not diminish local transport infrastructure links. I would qualify that support however if it meant the continuing pursuit of a policy which ignores or makes unsustainable the wishes of our citizens to live and raise their families in rural Ireland.

It is a clear fact that Ireland has one of the highest proportions of people living in rural areas among EU states. Indeed Eurostat figures indicate 42% of Irish people live in rural areas compared to an EU average of 27%.

Any National Planning Framework policy that emerges from this process must take these figures seriously and must not seek to further create through stealth or omission the continuing and unfair dominance of the Dublin region.

As you will know The programme for government commits to delivering 135,000 jobs outside of Dublin by 2020.

The NPF must work to achieve this goal not undermine it.

A revised plan for the rejuvenation of rural Ireland cannot escape or evade this responsibility.

There are a host of other issues that are besetting rural Ireland which the NPF process must take cognisance of; the lack of support to the Post Office Network and the knock on effects of increased social isolation is just one instance.

Access to adequate levels of maternal healthcare both pre and post-natal must be delivered as per the National Maternity Strategy.

In terms of planning for the future healthcare of our children I want to suggest the transfer of the proposed National Children's Hospital to a green field site at Connolly and away from the current St James' site.

The following points are pertinent to this issue:

the recent doubling of estimated cost of building the National Maternity Hospital on a brown field as opposed to a green field site at St Vincent's University Hospital. That differential would also apply to the St. James's site;

that the creation of a site at St. James's to accommodate a Maternity Hospital will prove hugely expensive requiring major additional rebuilding of the adult hospital;

the assessment of the National Children's Hospital Project by An Bord Pleanála did not adequately address several important aspects of the proposal relating to the medical functioning of the site;

due to the restricted nature of the proposed St James' site, parking provision for the NCH is dramatically lower and hugely more expensive than that of international comparator hospitals;

the Independent Review of National Children's Hospital project (2011) and the Dolphin Review of 2012 stated that it would be 25% less expensive to build on a greenfield site than on an urban site;

accessibility to the proposed St James's Hospital site for patients, staff and medical personnel will lead to extreme levels of congestion and increase the risks of adverse medical outcomes.

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The current situation with respect to the national roads network is also unsustainable and must be addressed.

The emerging NPF policy must take account of the following:

Government must consider increasing the regional and local roads budget as part of the Capital Investment Plan 2016 - 2021, in the context of the mid-term capital review which is underway;

— ensure that Transport Infrastructure Ireland and local authority funding is examined in the course of the expenditure review, with a view to being progressively resourced to ensure proactive national road project planning to increase the pipeline of essential roads projects, so that sufficient numbers of projects are brought through the planning and design stages and ready for construction as funding becomes available;

— accelerate support for the safety improvement schemes for dangerous junctions and bends, particularly where serious accidents and fatalities have occurred;

— continue funding, to enable the restoration of class 3/cul-de-sac roads;

— ensure continuation of Ceantair Laga Árd-Riachtanais (CLÁR) funding for disadvantaged areas;

— require local authorities to examine speed limits on all regional and local roads, and to ensure the process of adjusting speed limits continues to engage with local communities;

— ensure that local authorities take responsibility for ensuring that drainage, hedge cutting and the removal of overhanging trees are carried out where appropriate, in the interests of road safety, and to reduce damage caused to large vehicles particularly buses, lorries and agricultural machinery;

— urgently address road safety issues involving wild animals, such as deer, in co-operation with local authorities and other public bodies;

— undertake swift implementation of the commitment contained in the Action Plan for Rural Development, to examine the scope for increased investment in regional roads in the context of the review of the Capital Investment Plan 2016 - 2021, which will take place shortly;

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Consideration must also be given to the comprehensive delivery of a national house building programme that is that overly complex or liable to create or compound further unnecessary delays.

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I would also like to refer to the need to perform a significant re-evaluation of the status currently assigned to the town and environs of Clonmel under the National Spatial Strategy (NSS).

It is clear at this point that Clonmel is suffering from what is essentially a failure to recognise the true regional and national importance of the town.

Under the existing NSS Clonmel is still designated as a 'County Town' when the reality is that we outperforms many of the designated 'higher order' centres in terms of key socio-economic strengths and the potential to build on existing opportunities.

As such the existing designation is hampering our ability to become far more actively embedded in policy decisions that can create enhanced, globally competitive and dynamic economic conditions; goals which are after all the explicit aims of the National Spatial Strategy.

What we also need to see are practical policy measures designed to encourage more balanced regional development. At the moment Clonmel is suffering both from the removal of several key services and from what I have stated time and again as being the less than subtle political agenda to prioritise other areas of the South East for political gain.

By any standard Clonmel is a significant regional player and that is why we need an urgent reassessment which not only better reflects that reality but which also takes seriously its central position at the heart of the recently defined Southern Region.

We have enormous strengths here in Clonmel such as a strong research and innovation capacity, and the availability of essential strategic infrastructure. In policy terms therefore, by failing to object to the continued designation of Clonmel as a 'County Town' we risk jeopardising these strengths by

selling our potential short. That is something which I think everyone can agree is in no one's immediate or long term interests

Thank you for taking the time to consider this brief overview of some of the issues at the heart of the National Planning Framework policy.

Go raibh maith agat,

Mattie McGrath TD

