

**To: Department of Housing, Planning, Community and Local Government  
("the Department")**

**Re: New National Planning Framework ("NPF")**

**A NPF Submission from Wicklow Planning Alliance ("WPA")**

### **Introduction**

WPA is a "linkage" group participating in the County Wicklow PPN

### **Challenges:**

With regard to the issues and choices set out in the Department's Executive Summary, we agree with the connection that the Department makes between the Planning System or a National Spatial Strategy and the following:

- general health and quality of life issues, including physical and mental well-being;
- an effective response to Climate Change;
- the balance to be achieved between catering for a growing population and protection of the environment;
- the best possible management of public money to fund energy networks, roads, rail and general public transport, water and sewerage facilities, education and healthcare facilities including something as basic as respite care, postal services and broadband
- a successful jobs and employment strategy

**HOWEVER**, we have one major difficulty with your analysis. It omits to mention the way that land use zoning by elected local councillors at best ignores and at its worst subverts National Spatial Strategy.

If the new National Planning Framework (NPF") is nothing more than a "high-level document" that provides a framework or principles only for future development and investment but leaves the detail of how the NPF is to be implemented to lower level plans then whatever vision is set out in the NPF will not be achieved.

The NPF must do more than "influence"; it should be prescriptive and make those that are responsible for implementing the plan accountable; the power and discretion to zone land for development is an enormous power with knock-on consequences for general health and quality of life issues; those who exercise that power must be held to account. They should provide evidence-based information to justify their initiatives and decisions. Jobs do not fall out of the sky simply because a green field is zoned for employment. The NPF should contain clearly defined targets, indicators and responsibilities and include a mechanism for effective monitoring and reporting. The power to zone land should be taken away from elected members and rest with a National Authority.

Our views are influenced by what currently happens not just in County Wicklow but across the country in relation to the drafting of both the County Development Plan ("CDP") and Local Area Plans, ("LAP").

Currently, we already have higher order strategic planning policy documents and the existing law requires a CDP and a LAP to be consistent with national plans, policies and strategies relating to proper planning and sustainable development for example,

- the old 'National Spatial Strategy 2002-2020',
- the 'Regional Planning Guidelines for the Greater Dublin Area 2010-2022'
- the National Transport Authority's 'Draft Transportation Strategy for the Greater Dublin Area 2011-2030'.

Currently, a CDP and a LAP should provide for and control the physical, economic and social development of the County, in the interests of the overall common good and in compliance with environmental controls. In practice both the CDP and the LAPs deliver land use zoning that scatters zoning across the County; zoning that rejects the advice of the professional planners, the advice of the Chief Executive and the advice of the Minister. The result is often not in the best interests of the common good.

It is disheartening to listen to elected councillors complain that the National Transport Authority ("NTA") and Transport Infrastructure Ireland ("TII") won't commit to delivering infrastructure to service the zoning choices set out in a CDP or LAP.

A CDP or LAP is not a spending plan but they create spending expectations and elected councillors talk about them as though they are spending plans. When there is tension or disagreement between elected members and bodies like the NTA and TII that deliver infrastructure the general public is the only loser.

We have too many "big picture" planning documents whether at regional, county or local level that make no commercial or financial sense because they conflict with or ignore the spending restraints on the bodies like NTA and TII that deliver necessary infrastructure.

For those that travel north on the M/N11 every day to work in Dublin the M/N11 is at full capacity. It is simply not possible to squeeze in more capacity without building new highways through the Glen O'Downs and a new railway tunnel through Bray Head; environmentally and financially the cost of this is too high.

On the other hand, there is loads of spare capacity on both the train and the M/N11 travelling south. If there was an obligation to ensure that CDP's and LAP's made commercial sense land use zoning would abandon the "*one for everyone in the audience*" approach of dispersing zoning across the county and instead aim to consolidate growth in no more than two or three designated towns that are easily accessible to the M/N11 and rail transport and create the mass necessary to make it attractive for investors and workers to turn around on the N11/M11 and commute from Dun Laoghaire, Shankill and other places in the GDA to places of work in Arklow and Wicklow town. The IDA has made very good logical presentations to Wicklow County Council about the difficulties of attracting jobs to County Wicklow but the elected members are not listening to the IDA.

We are concerned too about the timing and synchronising of the work of LAP's and CDP's with both the work of the regional assemblies and the NPF. We are concerned about both time lags and also competition between LAP's, CDP's and the regional assemblies.

Irish people are not interested in local democracy if that means that in one county you pay for water or a fire service but in a neighbouring county you do not pay. People living in one off houses in remote rural Ireland expect the same public services that are provided to those living in cramped, high rise apartments in noisy, traffic congested urban areas. A strict prescriptive national spatial plan

will not diminish local democracy and is more likely to deliver “common good”, better management of exchequer investment and effective priorities.

If the NPF is to deliver “*sustained improvement in living standards and quality of life for all*” citizens, if we are to cease housing and rearing children in hotel bedrooms then more active land management by the State itself is essential. If the concentration of population and economic activity is to shift away from the East of the country, then the State itself must be more proactive in preventing the creation of private landbanks that are hoarded to increase prices and distort the market. Before any land is zoned for major development it should be acquired compulsorily by the State at current use value with no allowance for development potential, then serviced with necessary infrastructure such as water, sewerage, roads, schools, parks and play facilities and then franchised out to builders to build homes and places to work. We think Limerick in particular, should be targeted as a place to try and do things differently and learn from all the mistakes made in Dublin. Limerick has an attractive Georgian heart, it has the river, the university and much natural heritage.

In years to come our grandchildren are going to look back in disbelief and wonder how could we ever have thought it was OK to be so cavalier about Climate Change and natural resources, why we ever thought it was OK to be so car dependent, to spend so many hours every day commuting to work. If the Government starts immediately, Limerick could be targeted as the place to start building an economy that is about more than GDP figures.

### ***Answers to your Questions***

We answer your key **questions on page 7** as follows:

- Yes, we are prepared to make changes now so that a “healthier places” legacy can be handed over to the next generation of Ireland’s citizens.
- In order to effect improvements to our general health, including physical and mental wellbeing, in Ireland over the next twenty years the NPF should include provision for active land management by the State including the use of CPO powers so as to:
  - influence the location of population and economic activity
  - shift the concentration of population and economic activity away from Dublin and the East of the country
  - Prevent the hoarding of private land banks in locations best suited to development
  - Control and manage the price of land required for both social and affordable housing not just for the unemployed but for the poor that do work. The cost of renting in the private sector is forcing families to give up work and pushing them into welfare; this is demeaning, stressful and depriving citizens of very basic human rights. We think the cost of land is making housing unaffordable. We think families should not be burdened with the stress of mortgages for over-priced houses or high rents in the private sector.
- To ensure better or improved health and wellbeing of people and places in Ireland the NPF should identify the following as key priorities:
  - eliminate the need for long commutes to work

- eliminate car dependency
- provide more and more FREE park & ride facilities. Currently Greystones is proposing to charge for park & ride;
- improve building standards
- A greater participation in a healthy lifestyle could be encouraged by the provision of
  - more FREE PARK & RIDE facilities,
  - more public spaces for recreation like the mountain bike trails,
  - community gardens, play areas and green spaces generally.
  - Make it easy and attractive to walk and cycle everywhere.
  - Create a hierarchy of transport users and put pedestrians, cyclists and public transport users and their safety and convenience at the top of the hierarchy.

We answer your key **questions on page 9** as follows:

- We think Galway, Limerick and Cork cities should be prioritised as centres for development but in a way that learns from the planning mistakes of the past, that provides affordable housing and guards against infrastructural deficits.
- We think that a meticulously planned Cork-Limerick region could complement Dublin
- Administrative and governance structures need reform in order to take the power to zone land away from elected local members and to put a halt to the expectation that growth is to be encouraged everywhere.
- There should be more active land management by the State for the purposes of greenfield development and in the built-up areas of cities the designation of an area as an ACA should have consequences for and an impact on the character of development that would be deemed appropriate on neighbouring property. Built-up areas of cities need to accommodate a wide variety of workers, residents and visitors including young people leaving care or prison. Village centre and town centre designations must prioritise generous public spaces for pedestrians and cyclists and public transport so as to give such designations a sense of place, identity and destination. Otherwise, they become busy traffic congested thoroughfares where no-one wants to linger.
- The role of towns within the wider hinterland should aim not to compete with the cities but instead protect and enhance their own sense of place and self-sufficiency. Develop and protect the amenity value of their built and natural heritage and build their own community owned green infrastructure.
- Densification in urban areas should prioritise living over the shop scenarios.

We answer your key **questions on page 10** as follows:

- Identification of the strengths and weaknesses that distinguish one region from another is essential for regional development. Each region should aim to be different and have its own identity. The capacity of a region to realise its potential will be diminished if it simply tries to copy what is working in an adjoining region.
- We don't like the term "human capital" but each region must be an attractive place to live, work, learn and play.

- We think 3<sup>rd</sup> level education should be expanded to put greater value and prestige on non-academic training and skills. Ireland is behind other European states in developing a Green Economy. We think changes to address Climate Change could offer opportunities for all kinds of new technologies and new ways of living. To encourage start-ups people should have the free use for a limited time of work space to experiment with ideas. We think the construction industry in particular generates an enormous amount of waste that is not recycled. When slating a roof as many slates end up in a skip as on the roof and when tiling a bathroom as many tiles end up discarded as are affixed to the wall or floor. There must be somebody with the imagination to re-use this waste. The regions are ideal locations for the training and development of the new skills and materials needed for a Green Economy. There are excellent examples already up and running. Look at RTE's eco-eye programme and its report on the Shoalwater business in County Wexford. There should be no need for Ireland to import any of the materials that it needs for a successful, modern, Green economy.
- Strategic issues across local authority boundaries require co-ordination and collaboration but not competition. It makes no sense for two towns within a short distance of each other to build shopping centres or industrial units and then compete to attract the same anchor tenant. The anchor tenant is the only party that wins in that scenario. Adjoining local authorities need to collaborate in order to protect natural heritage like coastal areas, lakes and rivers and floodplains. They should also collaborate to achieve better sports and recreational activities.

We answer your key **questions on page 11** as follows:

- National economic growth and climate action objectives will be stymied if controls on one off housing are diminished; in particular, the Country's ability to achieve statutory targets for generation of green energy will be weakened.
- Local Communities should be encouraged to develop community owned generation of green energy and be allowed to sell into the national grid.
- Rural towns and villages should cater for strictly local needs
- To protect rural parts from development pressure development levies that are high enough to reflect the true costs of servicing development should be imposed. Spatial distribution exacerbates the need for vehicular travel, long journeys to work, school and college and congestion. It puts pressure on infrastructure such as water, roads, schools and health care facilities.
- the uplift in value as a result of zoning for development should accrue to the benefit of the State that bestows the zoning and not the landowner

We answer your key **questions on page 12** as follows:

- The NPF should facilitate co-ordination between settlements that share connections across the border. This will involve working with administrative and governance structures in Northern Ireland.
- We believe there are sound economic reasons why the NPF should facilitate a joined-up approach to strategic infrastructure and investment decisions that have a

cross-border dimension, for example in the areas of health, education, transport, agriculture and environment protection.

- We think Brexit will pose serious environmental challenges if businesses operating in Northern Ireland are not required to comply with the same EPA Licencing and general environmental standards expected of a member state of the EU

We deal with your **questions on Climate Change** as follows:

- The NPF should require district heating systems in all new developments.
- In American cities most new modern commercial developments have photovoltaic systems that harness solar energy not just for the particular building but for the city generally and the community in which the building is located.
- The NPF should set out a wide range of solutions for replacing fossil fuels as a primary source of energy in absolutely all new buildings whether in the residential or commercial sector. This is not difficult. The technology exists and is no longer new or expensive.
- promote and facilitate new community projects that can sell energy to the network
- prohibit reliance on oil or gas or any other fossil fuel as a primary source of energy for heating in all new buildings whether residential or commercial,
- Require all new buildings to meet the standard to qualify as “passive”
- Impose growth controls in rural locations so as not to permit a spatial distribution that will effectively sterilise wide areas against the siting of electricity transmission lines and wind turbines.
- Promote the use of electric vehicles and vehicles using gas and biofuels
- The NPF should be a vision for a low carbon urban future. It could be exciting; a new Industrial Revolution based on modern digital connectivity and clean energy. The NPF should be promoting energy co-operatives like they have in Germany. All over the county we could have thousands of people producing their own energy and selling it to the grid. Wind energy will eventually comprise more than 80% of Ireland’s renewable energy but wind energy does not have to be about wind farms owned by big corporations
- Climate Change resilience and sustainability should be central to the National Spatial Strategy.
- Require each administrative area to measure its carbon emissions.

The World Bank has warned that Climate Change is the number one risk to long term growth and economic security. We need to develop the skills and innovation required to meet the challenges posed by Climate Change

Joan Campbell

For and on behalf of Wicklow Planning Alliance

