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Message:

One page submission attached. [REDACTED]

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Personal Submission re Our Plan: Draft National Planning Framework.

Professor (retired) Seamas Caulfield, ex member, Advisory Group for National Spatial Strategy.

The Draft National Planning Framework proposes to focus disproportionate development on the four provincial cities and large towns of 10,000 and higher population. Referring to what the Draft classifies as 'rural towns and villages' (towns between 1500 and 9999 population) it states (p45):

'It is generally the case that the further these urban places are from the city, the more likely they are to have experienced stagnation or decline in recent years(Footnote 16). There are exceptions, including some successful places that are tourism 'hotspots'. While the same level of growth cannot be achieved in all places uniformly, this trend represents not only a significant loss of people, but also of potential and must be addressed.'

Footnote 16 reads (p151): **'The Census of Population 2016 indicates that small towns and villages (less than 10,000 population) aggregated together experienced less than half the national average rate of population growth between 2011 and 2016. Those with more than 5,000 people had a combined net loss of population during that time, when the national population grew by almost 4%.'**

The footnote and the comment about 'significant loss of people but also of potential' is due to a fundamental mistake in dealing with the Census figures as presented in footnote 16.

Along with Dublin and the four provincial cities there were 39 towns of over 10,000 in 2011. There were 152 towns with a population of between 1500 and 9999 people also classed as 'urban'. The 152 towns supposedly recording less than half the rate of national growth were in fact the fastest growing category of town (4.3%) against a national growth rate of 3.8% and a growth rate of 3.9% for the 39 large towns. The fundamental error has arisen due to Longford increasing from 9601 in 2011 to 10,008 in 2016 and likewise Skerries from 9671 to 10,043. The transfer of 20,051 people from one category to a higher one is the basis for the mistake which has had a major influence on the

disproportionate focus on large urban centres and provincial cities in the Draft. The 39 large towns did not grow by 48,269 but by little more than half that when the Longford and Skerries 20,051 is deducted from that figure.

Connacht/Ulster aka the Northern and Western Region with its provincial city on the southern edge of the region, with very few large towns but with many smaller towns in the 1500 to 9999 category and predominantly open rural settlement pattern will be seriously disadvantaged if the erroneous basis for much of the Draft strategy is not corrected.

(I am aware that it is not possible to calculate precisely the growth rates because of the change in treatment of 'environs of towns' in Census 2016 but as this change affects towns in both small and large categories it has no overall effect on the issue dealt with above.)