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

10 November 2017

Dear Minister Murphy,

I Alan Kelly fully support the attached submission and wish to be associated with it.

Yours sincerely,

ALAN KELLY TD



Comhairle Contae Thiobraid Árann
Tipperary County Council

Ireland 2040: Our Plan : National Planning Framework

Submission by Tipperary County Council



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1.0 Introduction

Tipperary County Council welcomes this opportunity to make a further written submission arising from the publication of the Draft National Planning Framework (NPF). The Council has previously made a comprehensive submission to the Draft NPF process in March 2017. That submission set out a vision for our county which was outward looking, rational, spatially focused and informed by a strong evidence base of the strengths of our economy, our communities and our natural resources. It is not intended to re-state the content of that submission, save where points need to be augmented.

The Council has reviewed the Draft NPF as published and welcomes that Tipperary has been chosen as a best practice example for planning for the low carbon economy. The Council also notes that the diversity of the rural economy has been recognised and that policy provision and support has been made for low-density and serviced sites in rural villages.

“Ireland 2040: Our Plan, National Planning Framework” must deliver on its core aim of achieving balanced regional development in order to achieve an internationally competitive and sustainable economy and a better quality of life for our citizens. For the reasons set out in this submission, the Draft NPF, as published, will not deliver on this central aim, with particular respect to the strategy outlined for growing the regions, the urban structure presented, and the absence of a clear vision and policy framework for towns and villages in rural areas.

This Council’s written submissions, with particular reference to the recommendations in this submission, will positively and proactively contribute to the finalisation of a new NPF in achieving a country which *“can be the best it can be”* in 2040.

2.0 Balanced Regional Development

The draft NPF seeks to set a new strategic planning and development context for Ireland and its Regions. This is supported by a commitment that this new NPF would not be *‘business as usual’* and would not repeat past mistakes. The Planning and Development Bill 2016, will enshrine in legislation the NPF objective to *“secure balanced regional development by maximising the potential of the regions...”*. Underpinning the proposed framework is the concept of equity in the creation of *“a fair society with strong social cohesion and converging living standards throughout the country in which all individuals, businesses, communities and regions have the opportunity to prosper”*.

2.1 Population Growth

The Council notes that the ESRI was commissioned to prepare population projections to inform the spatial growth of our country over the next 20 years. However, it is considered that overall national growth projections outlined in the draft NPF are far too low and do not take into account likely migration into the country.

This view is supported by the ESRI report published on the 26th October 2017 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 NPF 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”¹. The Council submits, with reference to the trend in the most recent census, that this will not represent a shift in population patterns.

Regional Population Targets – Trends and Projections

	2016 Pop	%	2040 Pop	% ²
Eastern and Midlands Assembly Area	2,328,517	49%	2,800,000	48%
Northern and Western Assembly Area	847,442	18%	1,000,000	17%
Southern Assembly Area	1,585,906	33%	2,000,000	34%
Total	4,761,865	100%	5,800,000	100%

When the projections set out in the draft NPF are 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 NPF. 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.

The Council notes that the population targets will be considered and determined during the preparation of the proposed Regional Spatial and Economic Strategies. However, a preliminary estimate and extrapolation of projected growth figures in the Southern region demonstrate the impact of growth in Tipperary which will effectively be stagnant.

¹ Draft Plan page 35

² *Note: Percentages have been rounded down and therefore total is 99% when computed.

Proposed Estimated Population growth in Tipperary

Population allocation for Southern Region	375,000 (maximum growth figure)
3 Cities	196,000
(Cork 115,000)	(allocated growth figures)
(Limerick 52,000)	
(Waterford 29,000)	
Large Towns	60,000
	(16% of total)
Remaining population for small towns below 10,000 and rural areas	119,000
Distributed between 9 Counties in Southern Region (proportions to be decided by RSES)	13,222
	(between 2018 and 2040)
Average annual growth in population (23 years of the NPF)	575 people pa
Houses required at annual basis (occupancy rate of 2.5)	230 houses pa

It is critical that the setting of population targets by the NPF and their subsequent application through the Regional Spatial and Economic Strategies (RSES) do not operate to prevent local and regional authorities from achieving objectives and targets set out in “*Rebuilding Ireland – Action Plan for Housing and Homelessness*”, the “*Action Plan for Jobs*” and other national, regional and local policies which are seeking to address accepted economic and social priorities. Clear guidance is therefore required to exclude categories within the definition of population targets requiring housing and accommodation provision where the purpose of that provision is to achieve targets in such policies.

Recommendations:

- **Published population projections for 2040, as evidenced by recent ESRI reports, are demonstrated to be too low. It is recommended that overall national targets are re-examined and increased to reflect the most recent ESRI report. An increased population projection should be allocated to the Southern Region.**
- **It is further recommended that to achieve its core aim of balanced regional development, population and jobs growth projections need to be significantly re-distributed from the Eastern and Midlands Region to other Regions with specific emphasis on large and small towns in the Southern Region.**
- **The setting of revised population targets at national level and their extrapolation at regional and county level must provide sufficient flexibility to ensure that Local and Regional Authorities will achieve targets in settled and accepted national, regional and local policies. By way of example, exclusions should apply to categories covered by objectives in “*Rebuilding Ireland*”, the “*Action Plan for Jobs*”, and objectives designed to meet additional student accommodation, housing for the elderly and housing provision in towns and villages based on current demographics within the county.**

2.2 Urban Structure: Towns

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 population and the remainder of the country. In this respect, the draft NPF must 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. These towns have the capacity for growth and development and offer a unique offering to new residents.

The implications of the impact of this 10,000 population threshold on towns in Tipperary is severe and is of deep concern. Towns including Nenagh, Thurles, Carrick on Suir, Tipperary Town, Templemore, and Cashel, which held Town Council status prior to 2014 and towns including Roscrea, and Cahir all share an ambition to grow and develop, attract business and tourists, and provide for new sustainable communities. The proposal to class all of these towns as “rural areas” must be amended and their status recognised within the final NPF.

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 needs to provide a spatial framework to assist stakeholders in achieving their ambitions or local authorities in delivering for their communities.

Recommendations:

- **The implications of the impact of the application of a 10,000 population threshold on towns in Tipperary is severe and is of deep concern. The proposal to class all towns below this population threshold as “rural areas” must be amended and their status recognised within the final NPF. The NPF should take reference from the Commission for the Economic Development of Rural Areas (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.**

2.3 Smart Growth, Site Assembly and Lands Zoning

The Council supports in principle, the strategy for ‘smart growth’ which targets the development of brownfield and infill sites. However the achievement of a 30% target for all urban centres and in particular villages is unrealistic and, it is submitted, will be counter-productive in many cases.

The Council also considers that the headroom of 50% for towns and villages will not provide for sufficient choice/options for development and will result in increased land prices and land hoarding. This would have a serious and detrimental impact on the ability of such towns to support population and job growth.

Recommendations:

- **30% target should only apply for large towns with a population > 20,000 people. There should be a 15% target for all other towns.**
- **Clear national definitions should be provided for infill and brownfield lands.**
- **Different Headroom for Cities, Town and Villages need to be provided. For Towns and Villages the minimum headroom should be 150%. Local Authorities should have the flexibility to not apply a zoning framework in small villages³**
- **Local authorities need to be given appropriate legislative powers for land assembly, site development activation and enforcement. In this respect Compulsory Purchase (CPO), Dangerous Structures and Derelict Sites Legislation etc. need to be reviewed and streamlined to address current challenges.**

³ Note: Small Villages in the Tipperary County Development Plans are identified by a boundary, wherein development can take place.

2.4 City Regions

The Council's previous submission clearly demonstrated Tipperary's relationship, role and contribution in supporting the growth of both the Limerick and Waterford City Regions. However, this critical role cannot be fulfilled within the proposed restrictive definition of a 'metropolitan area'⁴ or 'City Region' by reference to its workforce commuting distance⁵.

City regions should be defined by the functional inter-relationship with their surrounding areas including achieving critical mass, land use and transportation planning, employment, connectivity and access to educational and health services, green infrastructure, cultural and retail services etc.

Recommendations:

- **The City Regions should be defined by establishing a clear vision for their growth and development. This is to ensure that the socio-economic characteristics of each region achieves a critical mass to an international/national status. The metropolitan strategic area planning should be developed and refined as part of the preparation of the Regional Spatial and Economic Strategies and should be a central element of these Strategies when published.**
- **Ireland 2040: Our Plan should acknowledge that Limerick and Waterford are much broader than simply their cities and suburbs and include a wider City Region including towns such as Clonmel, Nenagh, Carrick on Suir, Cahir, Roscrea and Tipperary town which support the development and success of the Cities. Urban Centres, including Clonmel, which will complement and support Waterford City's Development should be identified on page 60.**

2.5 Connectivity

The Draft Plan should seek to prioritise the growth and investment needed in infrastructure, such as Ports, Airports, Road and Rail Infrastructure in the Southern Region. The growth and development of strategic infrastructure is critical if balanced regional development is to be achieved over the lifetime of the NPF. However, it is considered that the National Strategic Outcomes do not outline a strategic investment plan which will deliver the development of international and national city regions to a scale which can deliver for the country as a whole.

Recommendations:

- **The construction of the M24 motorway linking Limerick-Waterford-Cork should be identified as a priority. Chapter 9 of the Draft NPF addresses 'Enhanced Regional Connectivity', and states that "*better accessibility between the four cities, separate from Dublin, will support the objectives of Ireland 2040*". The construction of the M24 motorway would not only deliver optimum connectivity between Limerick-Waterford-Cork-Galway, it would provide direct connectivity, in a post Brexit Ireland, between ports, airports, towns and communities from the west to the south eastern seaboard.**

⁴

⁵ Identified only on the basis of workforce commuting distance.

- In order to achieve balanced regional connectivity, the infrastructure identified in previous submissions including Shannon and Waterford Airports and Ports at Foynes and Rosslare are considered critical regional infrastructure which should be identified as a Strategic National Outcomes and in the National Investment Plan. The ability of Shannon Airport to attract economic activity to the region through better international connectivity, it's well established aviation activities and existing strong tourism routes must be explicitly acknowledged in the NPF along with commitment to further invest in the growth and expansion of the Airport.”
- The Draft NPF should acknowledge the critical role which the existing rail services of Limerick-Dublin, Limerick-Nenagh-Ballybrophy and Limerick to Waterford and the Nenagh to Limerick Commuter line, play in ensuring connectivity in the region. The NPF should clearly set out commitment to the review of and enhancement of services and infrastructure on the existing rail lines.

3.0 Planning for Diverse Rural Places

The 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 needs to provide an overall long term sustainable rural settlement strategy, whereby residential development in smaller towns, villages and the open countryside are considered collectively.

Recommendations:

- The Council welcomes NPO 17b (programme of 'new homes in small towns and villages). It is recommended that this objective is broadened to include 'cluster housing and serviced sites in serviced and unserviced settlement'. The Council has commissioned a multi-disciplinary team to prepare Cluster Guidelines and prepare options in this regard and would welcome an opportunity to work with the Department on the development of this programme.
- The Draft NPF states that the rural areas should 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. The Council is concerned that this approach could lead to a displacement of local communities.
- The national policy objectives in relation to rural housing do not adequately address the issue of the continuing need for housing provision for people to live and work in rural areas. The uncertainty which has been created through the Draft NPF policy objectives on this issue needs to be clarified and resolved.

3.1 Planning and Investment to Support Job Creation

The Council acknowledges 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 also recognise that Strategic Employment centres are suitable for location in rural areas, where there are existing economic advantages due to the location and provision of nationally important strategic infrastructure, brownfield industrial complexes and national or regionally important natural resources.

Recommendations:

- **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 and support the ability of rural areas as ‘working landscapes’ with the ability to support change in the form of growth and development across a range of sectors. This includes the capacity of rural areas to accommodate Strategic Employment Zones. The NPF should support the identification of Strategic Employment Zones at the regional level having consideration to the existence and future provision of national strategic infrastructure, natural resources and brownfield industrial sites.**

4.0 Realising Our Sustainable Future

4.1 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. The Council would urge the inclusion of a stronger national policy response to promote renewable energies and ensure that climate change and energy considerations become part of all spatial planning processes.

The 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.

It is welcomed 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. It is considered 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.

Recommendations:

- **The NPF should include a commitment to prepare a national strategy and guidance on all forms of renewable energy technologies (wind, solar, anaerobic digestion etc.) This strategy, supported by a National Landscape Character Assessment, should identify renewable resources and potential at the national level and a national GIS database should be prepared and maintained.**
- **The NPF should provide greater clarity on the role and relationship between Spatial Plans at all levels and the National Adaption Framework and National Climate Change Mitigation Plan. Consideration might include Section 28 Ministerial Guidelines to provide guidance to local authorities on the integration of these frameworks to ensure effective spatial planning for climate change.**
- **The NPF should include a commitment to prepare a National Heat Plan which would map out how renewable heating systems can be deployed (at all scales of settlement) to assist in meeting overall heat targets.**
- **The title of the case study on page 116 of the draft referencing the Tipperary Energy Agency should be amended to reference “County Tipperary”. This would then reflect the partnership approach between the Council, the TEA, LIT, together with the work of communities in promoting renewable energy, climate change actions and the development of the bio-economy.**

4.2 Peatlands

The Draft NPF acknowledges that peatlands areas in the country may be suitable for energy production and it is noted that it is intended to prepare a strategic national land use plan for peatlands in state ownership. Tipperary, like many areas of the country, has seen the closure of traditional industries associated with peatland extraction. However, these lands remain an important national asset with potential for a new range of investment and diversification.

The NPF and the future National Peatland Strategy should seek to commit to the peatlands for uses such as – energy production, tourism projects, biodiversity and conservation. The National Peatlands Strategy should deliver masterplans, feasibility studies and investment should be provided for the development all sites under state ownership in consultation with local authorities and communities.

Recommendation:

- **The NPF should include a National Strategic Outcome to implement the National Peatland Strategy and the sustainable diversification for our peatlands to support economic rural development.**

5.0 Tourism

The Council considers that the relationship between national spatial planning and tourism development must be given stronger consideration and recognition in the draft NPF. Tourism is one of our most important economic sectors and is identified for significant growth over the next 20 years. To meet our national ambitions for the sector, it is important that the NPF identifies, protects and provides a framework for investment in our nationally important tourism areas.

The Council has highlighted Tipperary's international and national tourism assets in our previous submissions and the Lough Derg area has now been identified as part of Fáilte Ireland's new 'Lakelands' destination proposition. The recently launched "Munster Vales" proposition represents a strong collaboration across a number of local authority areas to new product development. It is noted that it is intended to prepare a new National Blue and Green Infrastructure Strategy to support tourism development and it is considered that the Lough Derg and River Suir areas of the county should be integral to this document.

Recommendations:

- **The NPF should recognise Tourism as an nationally important economic driver, and spatially identify and support the development of Fáilte Ireland's tourism destination propositions.**
- **The NPF should include a National Strategic Outcome to support investment in large scale tourism infrastructure and projects.**

5.1 Investing in Ireland 2040 – Implementation

The National Policy Objectives together with the National Strategic Outcomes should seek to underpin the potential of education as a means of driving economic growth and activity at a regional level. The NPF should include a commitment to invest in regional based third level campus at a remove from an institutions' main centre of activity.

Recommendation:

- **The National Strategic Outcome on page 140 should be amended as follows: The expansion and consolidation of third level facilities at locations 'removed from an institutions main centre of activity to support knowledge led economic activity'.**

6.0 Conclusion

Tipperary County Council welcomes this opportunity to make this further written submission to the the Draft National Planning Framework and confirms our commitment to the core objective of delivering balanced regional development and prosperity for all. However, if this core objective is to be achieved, further amendments to the draft NPF are requested. In particular, the key elements of putting in place a new national and regional development strategy for Ireland must focus, not alone, on the growth of urban areas but also make adequate provision for our rural communities. The recommendations outlined in this written submission are supported by the Elected Members of Tipperary County Council and seek to positively contribute to this national process and policy objectives.

Tipperary County, our Council, communities, business and voluntary organisations have the vision, capacity, track record and drive to contribute positively to achieving the ambitions of Ireland 2040.

9th November, 2017.

