

## Offaly County Council Submission in response to the draft NPF, November 2017

The Council would like to welcome many of the initiatives proposed in the draft NPF such as 'compact smart growth', urban and rural 'smart growth' funding streams, very strong commitment to address decline in towns and villages, sustainable travel patterns, permeability, focus on 'liveability' and place making, proportionate growth of rural towns & villages, 'service sites initiative'. It is imperative, in the first instance, that funding for these initiatives follows and that it is front-loaded in as far as possible given the current severe strain on many settlements throughout the country and the imperative not to allow settlements to fall into terminal decline.

Many good things are happening in Offaly and the Midlands, for example progress on the Midlands Action Plan for Jobs, projects aligned with the Action Plan for Rural Development, all within a region with potential for sustainable growth and with major quality of life advantages. We feel that continuity in these and other initiatives will only be achieved by means of a **specific designation of the Midlands** in the final framework.

The Council considers that many of the commitments in the 'Issues and Choices' paper have not been sufficiently followed through, with particular reference to details on the roles, comparative strengths and direction the regional areas, in particular the sub-regions.

The Council is concerned regarding the figures and rationale linked to National Policy Objectives 1(b), 1(c) and 2(a) for generally equal alignment of jobs growth and population growth. Whilst a very good planning principle for expanding areas generally, by doing so, such 'alignment' may actually discriminate against the Midlands. The Midlands is home to a large commuting population and consequently this principle of close alignment could mitigate against bringing people and their jobs closer together. **A specific, positively-biased jobs growth target for the Midlands and investment through the NIP to assist same should, we consider, be specifically provided for via a 'designation' for the Midlands.**

### **There are 5 main headings in Offaly Co. Co.'s submission on the draft NPF**

- 1: Lack of spatial detail, therefore a potential lack of understanding / compliance.
- 2: Lack of 'visibility' of the Midlands, its challenges and it's potential in the draft strategy.
- 3: The potential of the Midlands to bring people and their jobs closer together.
- 4: Concern that the National Investment Plan may not deliver on the potential of the Midlands.
- 5: Concern that the NPF and the aligned NIP may not allow Co. Offaly and its County town of Tullamore to reach their full potential.

### 1: Lack of spatial detail, therefore a potential lack of understanding / compliance

As acknowledged in the Issues and Choices paper, the NSS designated too many gateways and its implementation wasn't optimal both in terms of targeted investment and in terms of compliance and controls.

Offaly County Council is concerned regarding the lack of spatial direction at Strategic Planning Area level in the draft NPF. This lack of spatial direction will, we feel, be likely to give rise to difficulties in implementing the framework. This is due to potential lack of buy-in by agencies or the public, the scale of the regions and the possibility of different RSES's seeking to designate growth centres either too close or too far away from counterparts in adjoining regions amongst other potential difficulties.

Offaly Council's submission at the Issues and Choices stage stated the following: *"..it is considered that the NPF should be sufficiently specific to give certainty in roles for regions and larger towns to avoid the non-compliance with the NSS at county development plan level being replicated at RSES level this time around. The size and diversity of the regions would suggest that self-selection of roles across a region without clear direction from the NPF could damage the chances of success of the NPF"*.

During the period of the NSS, the larger towns in the Midlands grew strongly, some exceptionally so, however the coherency as envisaged in the strategy didn't emerge, despite having RPG's in place which followed from details specified in the NSS. The table below illustrates this, however it also demonstrates strong growth in the towns of Athlone, Tullamore and Mullingar during the period of the NSS – albeit much less than targeted. This theme was similar for other gateways.

	Pop 2002	Pop 2016*	% Increase
Athlone	15,900	20,700	30%
Tullamore	11,100	14,700	33%
Mullingar	15,600	21,100	35%
Portlaoise	9,500	22,100	133%
Longford	6,984	10,300	47%

\*Source DHPLG paper 2017

Intra-Regional growth didn't follow the NSS which had considerable spatial detail. However, with the lack of spatial detail in the NPF, there is a risk that much the same would happen again, perhaps even an NSS-style pattern, this time delivered through the RSES's.

Given that it is intended that the NPF will, under the Office of the Planning Regulator and the National Investment Plan be implemented more strictly than the NSS, it appears remiss that the choice of all regional key drivers and SPA roles would be left for the RSES's to decide, especially based on previous experience.

## **2: Lack of 'visibility' of the Midlands, its challenges and it's potential in the draft strategy.**

The Council's submission had the following headings, many along the same themes cited by other Midlands counties. The submission focussed strongly on the opportunities which the Midlands could offer the state as part of the NPF.

- An urban counterweight – the potential of the Midlands Gateway and supporting towns still remains.
- Source of Infrastructure and Services.
- Cheaper land and a commuting workforce which would relish the opportunity to work locally.
- Quality of Life and choice.
- An existing and rapidly expanding enterprise culture in a central location.
- A 'Natural' playground.
- Peatlands / Publicly Owned Lands.
- Education – Third Level / Outreach.
- Dublin Water Supply.
- Green Credentials.
- National Secondary Routes.
- Sustainable Travel.
- Tourism.
- Energy.
- Follow through / National & Regional Oversight

The Midlands has had many successes some of which are mentioned below. However, there are considerable issues to be addressed in terms of unemployment, youth unemployment, dependency ratio, lack of employment investment, income per person, long distance commuting, settlement patterns and reliance on sectors which are facing decline or major change, such as peat extraction and fossil-fuelled power generation etc. The Midlands Region (NUTS III) has the second highest unemployment rate, second to the South East. However, the Regional APJ has impacted in a very positive manner in the Midlands on the local economy of the region. The latest CSO Quarterly National Household Survey figures (Q2 2017) show that there are now 122,400 people employed. This represents a net increase of almost 8,400 jobs in the Midland Region since Q1 2015.

In this regard the Council would have concerns regarding the statement in section 2.4 which states: *"Future jobs growth would be geographically more distributed, but to limited number of large and regionally distributed centres, to include the north and west"*.

Despite the challenges as outlined above, there have been recent successes in the Midlands which could be built upon through a positive designation for the sub-region (SPA).

- Centreparks in Co. Longford - €230m
- Tullamore Distillery - €60m to date
- Abbot Ireland - Longford, significant jobs announcement
- STERIS – Tullamore, expansion plans
- Development of the renewable energy sector – over €400m in projects constructed or in planning in Co. Offaly alone, in addition to a growing cluster of energy research, testing and storage proposals.

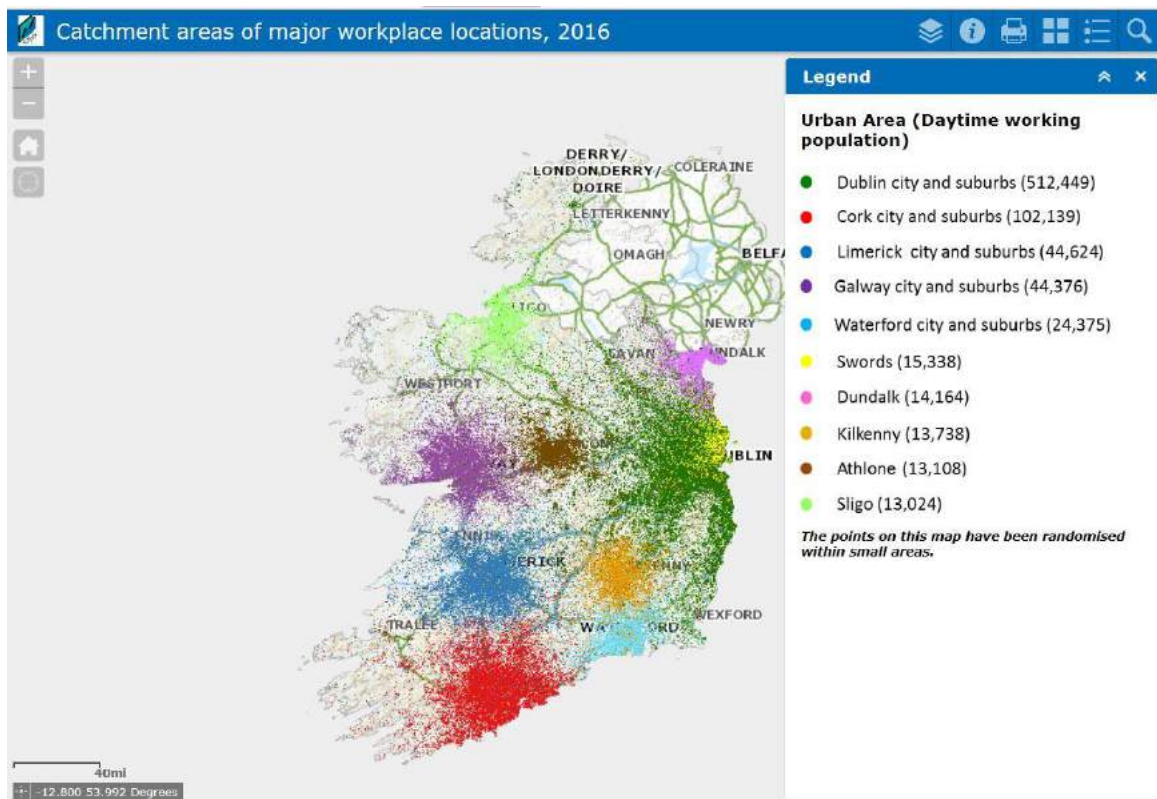
- Tullamore's Gold medal in the European Entante Florale competition 2016
- Net increase of almost 8,400 jobs in the Midland Region since Q1 2015, the baseline for the Midlands Action Plan for Jobs
- 15,000 additional persons at work in Q4 2016 vs Q4 2012 (Source: Midlands APJ)
- Early successes in the development of a world-class walking and cycling network, focussed initially on the Royal Canal and the Eurovelo 2 route.
- Food based successes, for example the Ferbane Food Campus.

**The Council would request that the Midlands be given a special designation in the NPF, a defined regional growth centre / supporting centres, its own population and positively-biased jobs allocations and commensurate funding in the NIP. Without same, the Midlands sub-region is unlikely to fulfil its potential as part of a successful Ireland in 2040.**

**3: The potential of the Midlands to bring people and their jobs closer together.**

The Midlands currently houses many of Dublin’s workforce, many leaving before 7am to get to work. The opportunity to bring these workers’ jobs closer to where they now live could be seriously compromised without the Midlands being designated as an entity which can deliver a counterweight to Dublin, separated by distance as opposed to the trend of continuing concentric overspill into many of the towns, villages and rural areas on Dublin’s periphery.

The centrality of the Midlands, its unparalleled national accessibility by both road and mainline rail, it’s viability as a counterbalance to the GDA and its potential to reverse long term commuting trends has not been addressed in our opinion. This potential as a counterbalance with excellent quality of life opportunities is demonstrated by the figure from the CSO (below). It would seem clear from this figure that the Midlands is an entity, sufficiently separated from the GDA, which requires specific addressing, such as that given to the 4 regional city areas. This figure also demonstrates the dangers of continued uncontrolled overspill from the GDA which could occur without defined SPA roles. Finally, it demonstrates the existence of a ‘green’ belt which can enhance the quality of life for those in the entire EMRA area.



Source (CSO).

The region enjoys considerable quality of life advantages, which are unfortunately seriously compromised for many people by distance to work and long commutes. It is likely that many of these long distance commuters have put down roots through schools, communities etc. and it makes sense to invest in the Midlands to allow them to access employment locally.

**To fail to make specific allowance in terms of employment and investment growth in the Midlands, particularly through the NIP, would be likely to exacerbate the trends of employment in the GDA and long distance commuting.**

#### **4: Concern that the National Investment Plan may not deliver on the potential of the Midlands**

The Council considers that the opportunities put forward for the Midland SPA in our 'Issues & Choices' submission will be extremely difficult or impossible to realise without a level of sub-regional spatial direction in the final NPF.

The National Investment Plan is unlikely to contain the investment tools to allow the Midlands to perform to its potential when it doesn't exist as a tangible entity in the draft NPF.

The Midlands SPA has a small population relative to both Dublin city and the eastern SPA. Approximately 26 of the 41 towns of over 10,000 population nationally are in the EMRA. Competition both in 'principle' for 'Regional Growth Driver' status (noting that c.50,000 population is cited as being required for critical mass) and in quantitative terms (99,000 homes or c.200,000 population being allocated for this group of towns nationally) will we fear, not favour the Midlands.

The EMRA is home to towns like Drogheda, Dundalk, Navan, Swords, Naas, Newbridge, Leixlip, Maynooth, Kildare, Bray, Wicklow, in addition to new towns (SDZ's) such as Clonburris, Cherrywood etc. from which it appears the population and housing allocation per tables 2.1 and 5.1 will have to be allocated. By extension, this would relate to jobs also under the proposed principle of alignment of population growth and jobs growth. It would appear to be extremely challenging for the Midlands towns to compete for a tangible regional driver or drivers at RSES stage without a NF designation to guide the RSES's.

Availability of infrastructure is a key component in future development as stated in the draft. Irish Water's 'Project Needs Report' (2015) for the Dublin Water Supply project, in its 'most likely' population growth forecast projects the "benefitting corridor (Midlands)" growing in population by about 150,000 by 2050. While this corridor obviously includes a lot of large towns closer to Dublin, the benefitting corridor would appear to favour positively-biased development, in particular employment development in the Midlands, again helping to bring people (including existing long distance commuters) and their jobs closer together.

**Therefore, without a 'designation' for the Midlands, a commensurate population target, a positively-biased jobs target to reflect the potential to reverse the long-distance commuting from the Midlands and a commensurate Midlands link to the National Investment Plan, it is considered that the Midlands will be unable to fulfil its potential and provide part of a network of viable national counterbalances to the GDA.**

**5: Concern that the NPF and the aligned NIP may not allow Co Offaly and its County town of Tullamore to reach their full potential**

As shown in the table above Tullamore's population grew strongly during the period of the NSS to date (2016 figures). Co. Offaly's growth more or less mirrored the state average during the period. Albeit with less absolute growth than envisaged, the County largely fulfilled its role under the NSS / MRPG's.

However, to find a period with 20-25% growth for Tullamore one has to go back to the period 1951-1971. It is considered that Tullamore's potential as an urban driver for the county and as an attractor of sustainable levels of development within the region will not be realised by the NPF as drafted.

There are strengths in Co. Offaly and Tullamore which need to be built upon, including some significant employers, reverse commuting and established precedents in serving global markets from the Midlands. There is potential for strong economic growth, however without given the spatial issues identified in this submission, this potential may not be realised.

## **Observations of other specific aspect of the draft framework**

### **State-Owned Lands**

The Council is concerned that the initiatives regarding state-owned lands, being focussed only on lands in cities and large towns could miss the opportunities (and challenges) for state-owned lands in rural areas. In Offaly for example, the figure for publicly-owned lands is between 20% and 25%. While the focus of state-owned lands in towns would naturally be on residential use, there is potential for state owned lands in rural areas for provide a myriad of benefits under headings as diverse as climate mitigation, flood management, 'windfall' employment, amenity, energy, agriculture, forestry, biodiversity services, conservation, education, 'wild' areas, tourism and possibly more. The Council considers that that the potential of state owned lands in their totality should be addressed in the final NPF, in order that the NIP will provide for investment where necessary to deliver on the potential.

### **Strategic National Land Use Plan for Peatlands in State Ownership**

The Council welcomes the statement that a Strategic National Land Use Plan for Peatlands in state ownership will be prepared and considers that this would be worthy of inclusion as a National Strategic Objective given the range of issues and potential benefits for the country as a whole. It should be widened to include industrial peatlands not in state ownership also, as many of these adjoin the state peatlands. We would note however that this initiative is contained in the energy section and would ask that the scope of such a plan would be clearly defined to address the range of future land uses as mentioned in the paragraph above.

### **An Over-arching Land Use Policy:**

Section 8.2 of the draft NPF, under 'Sustainable Land Management and Resource Efficiency', refers to the need to manage competition for land resources. A National Planning Framework would be strengthened through the support of a Strategic Land Use policy. Further policies in the areas of renewable energy generation such as biomass and solar energy are also needed to compliment the forthcoming wind energy guidelines.

It is important that outside of the urban / built up areas and their immediate hinterlands, land use is carefully managed to optimise the potential benefits of Agriculture, Forestry, Ecology, Landscape and Amenity. Some demands may be competing, but not all are mutually exclusive. An optimal land-use strategy, that balances these demands will further enhance our green credentials in Agriculture, Tourism and Renewable Energy, all of which have direct economic benefits as well as environmental benefits. Strategic land-use is also hugely important in managing Climate Change. A Strategic Land Use policy would support and enhance sustainable land use, help streamline planning decisions on major renewable energy infra-structure and optimise the overall benefit of a strategic natural resource. In essence, it relates to the well-used phrase, 'the right thing in the right place'.

### **Greenways**

Offaly County Council strongly supports the sections on rural and urban greenways and would reiterate our comments made in our earlier submission regarding Co. Offaly's and the Midlands's key role in providing a national network. It would be welcomed if the national linkages per our



previous submission were included in a NPF map to ensure that the NIP follows with commitment to funding the key national and regional routes as soon as possible.

### **Energy Policy and Planning**

The Issues and Choices paper mentioned the possibility of creating Strategic Energy Zones or Corridors as areas of national priority for renewable energy investment, as well as to provide a test bed for new technologies. The energy policy and planning section on p.113 of the draft strategy however defers to the Electricity Policy and Development Framework which has been forthcoming since 2013. It would seem remiss that the NPF as the overview document of national planning to 2040 would defer in full to the policy framework. Existing players in the region such as ESB and Bord na Mona are pivoting to produce greener energies e.g. biomass, wind and ground solar. In Co. Offaly, to date over €400m worth of wind energy projects have been permitted or are currently awaiting decisions. Add to this the number of solar applications, waste to energy and energy storage applications and there is a tangible energy entity in the County, which is replacing older technologies on which the County and energy producers relied. Such developments are, however, essentially the 'end products', i.e. the machinery, and it is important to stress that the higher-order developments such as R&D, assembly, administration etc. should be encouraged and built upon, especially in a clustering approach. Building on the industrial heritage of energy production, the Midlands in general and Offaly in particular are well placed to be a Green Energy Hub for Ireland. This is of particular relevance in terms of climate change leadership. Private companies are already testing innovative storage and grid stability technology in Co. Offaly.

### **Miscellaneous observations**

Notwithstanding the comments made above regarding the lack of visibility, the role and the potential of the Midlands, the Council considers that there could be more clarity around the following issues in the final NPF

1. The terms infill / brownfield and the built-up envelope of existing settlements seem to be somewhat interchangeable in the draft and are joined as one in section 3.8.
2. Clarity on the spatial extent to which the area called "Dublin city and its suburbs" for the purposes of table 2.1 refers, with particular regard to its impact on population and jobs allocations to the greater EMRA area.
3. For the final framework, it would be worthwhile to differentiate between the "key elements" (p.8) and the "Elements" (p.30 & 31) as the headings don't align.
4. Query the reference of 'smaller (>10,000) towns' in two places in section 4.5 which deals with defining the urban influence of towns.
5. In chapter 8, reference to realising energy efficiency through retro-fitting existing building stock could be made more explicit. Similarly, specific reference to retro-fitting permeability enhancements as per the National Transport Authority's Permeability in Existing Urban Areas guidelines would be worthwhile adding to the framework in our opinion.
6. The Housing Needs Demand Assessment, the very detailed zoned and serviced land development plan requirements, the Smart Growth initiatives (urban and rural), the requirement to build new housing on brownfield / infill lands, public realm and 'liveability' aspirations, 'service sites' initiative and enhancing low carbon transport through enhanced

permeability will all demand commitment at a national level to adequately resource the forward planning functions of Local Authorities.

In conclusion, the Council welcomes many aspects of the draft, suggests amendments and clarification on a number of issues and importantly strongly requests a designation to reflect the challenges and opportunities faced by the Midlands. The Council considers that the Midlands SPA should be assigned positively-biased jobs and population targets to meet these challenges and allow the delivery of the major opportunities towards effective regional development cited herein. We look forward to the next stage of the process and hope the Department will take our comments into consideration in the preparation of the final NPF.

End.