

LABOUR PARTY SUBMISSION TO THE NATIONAL PLANNING FRAMEWORK

Introduction

The Labour Party has previously submitted to the consultation process of the NPF and wishes to expand upon some of the points made in that submission now that we have the draft plan available, albeit with a shorter timeframe than we believe is appropriate given the important role this plan will play in the way in which our country develops over the next 22 years.

Consultation and a sense of ownership from the public are crucial if the plan is to succeed and, despite widespread opportunities, which we acknowledge, in the earlier stages, more time should have been given after the substantial document was published.

We don't believe the plan is ambitious enough for our country and our people. We expect that other submissions will have significant proposals to make and strongly urge the Government to take the time to give real consideration to all the submissions received and to be open to incorporating those that add to and strengthen the plan.

In our opening paragraph to the submission we made in March 2017, we argued that the plan must be radical and ambitious and underpinned by the values of solidarity, equity and sustainability. We reiterate those fundamental points.

Some of the areas where the plan needs to be more radical and ambitious relate to:

- Regional balance
- The potential of our cities and towns
- Housing needs
- The development of a sustainable environment and a just transition to green energy
- The provision of public transport.

22 years is a long time and processes, technology and ways of living are constantly evolving at a much faster pace than at any time in our history. Even population predictions are changing so rapidly that there are already credible assessments that suggest we could have more than a million more people much earlier than the plan anticipates. The Plan must have the capacity to respond to unanticipated opportunities and lay the groundwork so that communities can respond and benefit.

We also feel it is important to re-iterate the point that this must be a 'whole of Government' Plan, that commits all Departments to purposeful and coherent action so that all significant investment decisions and plans of all Departments and State Agencies and

regulatory processes are aligned with the NPF, a proofing method that ensures this compliance and consistency is essential.

Population Growth

As referred to above, the NPF anticipates a population increase of 1 million people by 2040. However, the Economic and Social Research Institute stated last month that the population of Ireland will increase by 640,000 by 2030 which proportionately would imply a higher figure than 1 million by 2040. For an effective growth strategy, we need accurate base figures.

Incorrect figures are particularly problematic when it comes to housing and we will return to this in the context of the development of cities and towns.

In addition, the NPF doesn't appear to give enough consideration to the qualitative demographic change we will see in the next 22 years as well as the quantitative. The ESRI estimates for instance that +65's will make up 1 in 6 of the population by 2030 as opposed to the 1 in 8 they did in 2015. While the chapters on Healthy Communities and Age Friendly are welcome and important considerations for a National Plan, we are going to need to elaborate a much clearer strategy to deal with the health requirements of an aging population.

We appreciate the general goals in these sections but they are short on practical policy proposals.

As David O'Connor has noted, the NPF also appears to significantly underestimate available land. He has written:

"In spite of Housing Minister Eoghan Murphy's exasperating contention that development is being held back by overly restrictive planning regulations, Dublin City and Suburbs contains at least 2,700 hectares of zoned, mostly serviced, brownfield development land. Many of these land banks are rail-based and even have advanced urban design plans approved and ready to go.

Including the Docklands area, there is at least enough development land available in Dublin to accommodate 300,000 people, at medium densities using these large sites alone. This is comfortably more than the 265,000 forecast by the draft NPF.

These land banks need to be prioritised for the creation of sustainable new eco-communities, just like those already developed in cities like Stockholm and Freiburg. The NPF could provide for this and even go so far as to determine the need for a dedicated multi-disciplinary planning and design team for each, something kernel to the success of

places like Grangegorman and Adamstown (before development ground to a halt in the latter).”

Regional balance

The Plan identifies Regional imbalance as a problem in Ireland.

It surely is when you consider that the centre of the country when it comes to population is the town of Maynooth, 20 minutes drive from the edge of Dublin.

However, there is little in the plan that will change that. The division of the country into 3 cumbersome, artificially designed regions (largely to attract the maximum EU funding) is a problem in itself. The population change between the 3 regions during the lifetime of the plan is so minimal as to make virtually no change to the current population balance.

We support the intention to concentrate most of the population growth in the 5 cities of Dublin, Cork, Limerick, Galway and Waterford but the doubling of each of their populations will not change the status quo of geographical imbalance.

The ambition must be greater for cities outside of Dublin.

The plan is also weak in not differentiating identifying key urban centres in the large town category that have a strong regional role and significant scope for sustainable growth.

The Potential of our Cities and Towns

Planning for an increase in population of 1 million plus, mainly in urban centres, has to start from the people who live and will live in them. We need strong vibrant communities.

This means good housing, and enough of it, good public transport linked to that housing and the avoidance of sprawl. The first priority when it comes to spatial planning with this starting point, is to use the space that is already there.

In Dublin alone, there are enough brownfield sites and potential homes with planning permission to absorb much of the growth and the same is true of other cities [REDACTED]. [REDACTED]. The speedy introduction of the Vacant Sites Levy, graduating to a higher rate over time, and a vacant homes tax, are necessary spurs to get these sites used. The Labour Party has also published legislation to implement the recommendations of the Kenny Report to stop the hoarding of land that is suitable for home building.

The submission by Jan O’Sullivan, Labour T.D. for Limerick, expands the case for how a City such as Limerick has far more potential for growth than the plan envisages. It should be

read alongside this submission and the potential for Cork, Galway and Waterford also explored.

The Ireland of the second half of the 21st century will need several major cities, not just one.

Many towns around Ireland have empty buildings on their main streets. Recent census data has identified these towns as being the most impacted by the economic collapse. It would greatly help their recovery if the NPF specifically targeted the revitalising of these towns by reclaiming and re-occupying those empty properties for residential or commercial use, through local authority acquisition or otherwise. Current schemes are not delivering and need to be revisited.

It has been rightly argued that Dublin City and suburbs have too wide a geographical boundary in the Plan. There is also a failure to recognise large towns in North County Dublin as towns in their own right. Labour Party representatives in North Dublin have pointed out that there will be less homes built in these towns than the number envisaged in the County Development Plan, if the NPF is not changed. This surely can't be right as we deal with an acute shortage of housing supply.

Within the context of future population growth, the role and future development of large towns needs to be more clearly defined in the NPF. For example taking as a case study the large town of Drogheda if it continues to grow at recent rates there should and must be a clearly defined pathway towards achieving city status. The greater Drogheda area has grown by 80% since the mid-1990's. The population of the agglomerated urban area is now in excess of 80,000 and meets the criteria laid down for city designation by the OECD and European Commission under its 'harmonised definition of cities.' Full consideration should be given to classifying the Drogheda area as a city under this internationally recognised definition.

Sustainable Development, Climate and Transport

In our previous submission the Labour Party outlined in detail our proposals on sustainable growth, climate change, a just transition and providing for public transport and would ask that the NPF reflect these concerns.

It is essential that the NPF has these issues at the heart of future development. The need to meet ambitious carbon emission targets and climate proof our country must be more strongly emphasised, along with a focus on development that is both sustainable and centre don public transport networks. Existing infrastructure including the national rail network must be better utilised and taken into account in the plan. Alongside this, bus networks and cycling infrastructure are central to sustainable developments.

To achieve these goals the NPF must include more specific actions and targets. Taking as an example the area of west Dublin and surrounding hinterland that will accommodate significant future population growth, the actions that such a framework should and could highlight are:

- Electrification of Maynooth Railway Line - servicing new towns/neighbourhoods between D15 and Maynooth
- Electrification of Sallins Railway Line - servicing new towns/communities between Balgaddy in Clondalkin and Sallins in Kildare
- The investment in ensuring zoned land with good quality LAPs or SDZs to the west of Dublin get the necessary infrastructure investment (Hansfield SDZ, Barnhill SDZ, Confey LAP etc)
- Protection of Liffey Valley High Amenity area from development between the two rail corridors to the west of Dublin City
- A new orbital motorway to the west of County Dublin from the M7/M9 junction in Kildare to Drogheda to take pressure off M50
- All SDZs and LAPs to have strengthened provisions to ensure Schools, Green Spaces, Public Parks and amenities are delivered in tandem with housing development.

In conclusion the Labour Party reiterates our view that the NPF must be more radical and ambitious in the five areas we have identified, it must be a whole of Government approach, and most importantly it must be guided by the spirit of inclusion as well as the mental and physical wellbeing of all of our people.

Jan O'Sullivan TD

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