

Sinn Féin Submission on “Ireland 2040 Our Plan National Planning Framework

10.11.17

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General Comments

- Sinn Féin supports the principle of a National Planning Framework and the placing of an NPF on a statutory footing
- We do not support the current draft as outlined in Ireland 2040, Our Plan
- The current draft is too vague, lacking defined commitments and unclear how its policy objectives will be met
- The absence of a clear investment programme in the form of a capital programme as an integral part of the draft is a fundamental weakness particularly with respect to ensuring an adequate provision of public service, transport and economic opportunities.
- The Document does not give enough focus on the all Ireland dimension, lacks vision and firm targets for the development of a truly ‘National’ framework. This is most evident in the lack of foreground of the need for Derry to be at the centre of social and economic growth of the entire North West and for greater focus on strategic infrastructural links and investment strategies across the border region.
- The document is also blind to the spatial dimension of social and economic disadvantage and as such if implemented as currently drafted would simply, serve to further entrench that disadvantage
- The distribution of population growth targets is over concentrated on the Dublin and commuter belt area which will have a detrimental impact on both Dublin and the rest of the state resulting in overdevelopment in Dublin and the commuter belt and under development in the other regions.
- There is no clear phasing to ensure that social and economic infrastructure is developed in pace with population growth, again particularly in the cities
- Sinn Féin is particularly concerned with the low level of public engagement with the pre draft consultation process as evidenced in the low level of submissions
- We are also concerned that Niro pro active consultation in communities and with Local Authorities and other stake holders has been organised with the current draft
- We would strongly recommend that the revised draft following the November 10th submission deadline is put out of a final stage of local consultation with more recourse given and engagement than to date to ensure the final draft is reflective of a broader range of public opinion
- We also propose that a mechanism if found, similar to the final decision making process in County Development Plans, for the Oireachtas to have an opportunity to introduce final amendments and to vote on the final proposed document.

Proposed Changes to NPF Policy Objectives

	NPF Policy Objective	Sinn Féin Policy Objective
	Chapter 2- Ireland 2040 Principal elements	Chapter 2- Ireland 2040 Principal elements
1(b)	<ul style="list-style-type: none"> Eastern and Midland Region: a targeted 475,000 - 500,000 (0.475-0.5m) additional people, i.e. a population of around 2.8 million; Northern and Western Region: a targeted 150,000 - 175,000 (0.15-0.175m) additional people, i.e. a population of around 1 million; Southern Region: a targeted 350,000 - 375,000 (0.35-375m) additional people, i.e. a population of almost 2 million. 	<p>Comment: Sinn Féin believes that the target set out in 1(b) are weighted to heavily on the Eastern and Midland Region and will result in an increasing overcentralisation of development in the Dublin and commuter belt area. This will have a negative impact on Dublin and the commuter belt in terms of over population and will undermine the objective in the NPF for balanced growth in the other regions.</p>
1(c)	<ul style="list-style-type: none"> Eastern and Midland Region: around 330,000 (0.33m) additional jobs, i.e. at least 1.33 million in total; The Northern and Western Region: around 110,000 (0.11m) additional jobs, i.e. at least 450,000 (0.45m) in total; The Southern Region: around 220,000 (0.22m) additional jobs, i.e. at least 880,000 (0.88m) in total. 	<p>Comment: Sinn Féin is concerned that these jobs targets do not take into account the existing regional disparities within and between regions. These disparities need to be addressed with sub regional targets that focus on those areas in greatest need of employment in order to avoid the proposed regional targets simply replicating the existing regional and sub regional disparities.</p>
2(c)	<p>Accessibility to the north-west of Ireland and between centres of scale separate from Dublin will be improved, focused on cities and larger regionally distributed centres and on key east-west and north-south routes.</p>	<p>Amendment: insert the following at the end of 2(c) “such as by upgrading the N4 to motorway status to improve accessibility for the North-West and the construction of a dual carriageway upgrade of the N14/ A5/ N2 Letterkenny and Derry to Dublin Roads and the re-establishment of a rail connection from Derry/ Donegal to Sligo and Dublin”</p> <p>New 2 (c) x “Significantly improve accessibility to the North West of Ireland (West Tyrone, Derry City & Donegal)”</p>
3(a)	<p>Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements¹²</p>	<p>Amendment: insert the following at the end of 3(a) “through a mixture of new build, renovation of existing vacant stock and change of use of vacant commercial units. Measures to ensure an adequate supply of social and affordable rental and purchase homes to meet local housing demand as determined by Local Authorities must be considered central to this objective and considered as such by planning authorities.”</p>

3(b)	At least half (50%) of all new homes in the five Cities and immediately adjoining suburban areas of Dublin, Cork, Limerick, Galway and Waterford would be delivered within the built-up envelope of existing urban settlements ¹³	Amendment: insert the following at the end of 3(b) “through a mixture of new build, renovation of existing vacant stock and change of use of vacant commercial units. Measures to ensure an adequate supply of social and affordable rental and purchase homes to meet local housing demand as determined by Local Authorities must be considered central to this objective and considered as such by planning authorities.”
3(c)	In areas other than the five City and suburban areas of Dublin, Cork, Limerick, Galway and Waterford, at least 30% of all new homes would be delivered within the built-up envelope of existing urban settlements ¹⁴	Amendment: insert the following at the end of 3(c) “through a mixture of new build, renovation of existing vacant stock and change of use of vacant commercial units. Measures to ensure an adequate supply of social and affordable rental and purchase homes to meet local housing demand as determined by Local Authorities must be considered central to this objective and considered as such by planning authorities.”
Chapter 3- making urban places stronger		
5	Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth and investment.	Replace 5 with: “Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth and investment, as well as promoting linkages between networks of major towns and cities, where suitable”
6	Support regeneration of cities, towns and villages of all types and scale in order to accommodate changing roles and functions and enhanced levels of amenity and design in order to exert a positive influence on their surrounding area.	Amendment: insert “social and economic” between “Support” and “regeneration” Amendment: insert at end of 6: “Place a particular focus on locally based SMEs as part of this regeneration”
7	Strengthen all levels of Ireland’s urban structure, with a particular focus on: <ul style="list-style-type: none"> • Our Capital, Dublin. • The four Cities of Cork, Limerick, Galway and Waterford. • Large towns (>10,000 population) located outside the five city regions¹⁶ and particularly in the northern and western region. • Small towns (<10,000 population) located outside the five city regions in conjunction with their surrounding rural areas¹⁷. 	Comment: Sinn Féin has a concern that designating all urban areas below 10,000 as “small towns” made have a detrimental impact on their development and ability to attract public and private development. We would ask that the definitions set out in 7 be reviewed and an clear rationale outlined for the division between large and small towers. Comment: Sinn Féin concerned that the cities of Derry and Belfast are not fully integrated into the Planning Framework at this macro level. This is particularly important with respect to the role that Derry City has in the development o the

		North West region as a whole.
8	Ensure that the targeted pattern of population growth of Ireland's cities and large towns to 2040 is proportionate, in accordance with the targets set out in Table 3.1 (p47)	Amend Cork targets in Table 3.1 (p47) as follows: Change % Rage to 60-70%. Change People to 134,000. Change 2040 target to 345,0
	Chapter 4- Planning for Diverse Rural Places	
15	Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacancy and deliver sustainable reuse and regeneration outcomes.	Amendment: Insert at the end of 15: "and by supporting small business which as key to addressing vacancy and by creating options for sustainable reuse and renovation of neglected infrastructure and the built environment."
18(b)	In rural areas under urban influence, to facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic need to live in a rural area and relevant siting criteria for rural housing in statutory guidelines and plans.	Comment: The facilitation of a sustainable level of construction of single housing in rural settings must be done on the basis that it will be the main habitual residence of the household. The need for a demonstrable economic link to the area is not either efficient or fair as criteria for granting planning permission. Neither is it just or efficient to demand a family or social link, when in the face of depopulation there is a need to attract young families to rural areas. This social and family criterion excludes those originating outside the country or even county. County development plans should limit one-off rural housing for environmental and planning purposes without defining criteria based on wealth or race.
19	Project need for single housing in the countryside through the local Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.	Comment: The criteria for one-off rural housing while being strictly observed must be formulated on the premise that more housing is needed in rural areas currently experiencing depopulation because of lack of social, economic and residential options for existing communities.
22	Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills development for those who live and work in rural areas.	Replace 22 with: "Support and facilitate delivery, under state control, of the National Broadband Plan as a step towards developing enterprise, employment, education, innovation and skills development for those who live and work in rural areas."
23	Facilitate the development of a National Greenways/Blueways Strategy which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional level.	Amendment: Insert at the end of 23: "This must also include the revitalisation of former routes"
	Chapter 5- People, Homes and Communities	
30	Plan for a more diverse and socially inclusive society that targets equality of opportunity	Amendment: Replace "opportunity" in line 2 with "outcome"

	and a better quality of life to all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.	
31	Facilitate fostering and protecting the Irish language, particularly within Gaeltacht regions.	<p>Comment: The Irish language should be protected within Gaeltacht regions, based on the geographic based planning, in relation to the Irish Language, is also taking place under the 2012 Gaeltacht act, with three different categorisations of planning areas (Limistéar Pleanála Teanga Gaeltachta, Bailte Seirbhíse Gaeltachta, Líonraí Gaeilge), within and without Gaeltachtaí</p> <p>Amendment: Insert at the end of 31: “In line with its development strategy Údarás na Gaeltachta will be allowed to pursue a policy of industrial development in Gaeltacht areas in line with the 20 Year Strategy for the Irish Language and other Gaeltacht development initiatives.”</p>
32	<p>Prioritise the alignment of targeted and planned population and employment growth with investment in:</p> <p>The provision of early childhood care and education (ECCE) facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations.</p> <p>The expansion and consolidation of third level facilities at locations where this will contribute to regional development.</p> <p>Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.</p>	<p>Replace 32 with: “Prioritise the alignment of targeted and planned population and employment growth with investment in:</p> <p>The provision of early childhood care and education (ECCE) facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, that meet the diverse needs of local populations.</p> <p>The expansion and consolidation of third level facilities at locations where this will contribute to regional development.</p> <p>Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.</p> <p>Dedicated locations for the pursuit of Research and Development, such as in the forms of Science and Innovation Parks, supported and planned by Local Authorities, in collaboration with Industry and Institutions of Education”</p>
33	Target the delivery of 550,000 additional households up to 2040 in accordance with the policy objectives of Ireland 2040.	Amendment: Insert the following after households on line 2 “with an appropriate mix of social rental, affordable rental and

		afordable sale homes for”
35	Implement measures to reduce vacancy and to progressively target the reduction of the national housing vacancy rate to 5% by 2040 (currently 9.15%).	Amendment: replace 2040 on line 3 with “2025”
37	Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.	Amendment: insert “where agreed in city and county development plans” after “density” in line 1
39x		New Objective: “Ensure the highest levels of energy and water efficiency in all new residential and commercial developments through a progressive improvement in building regulations and planning laws to move to near zero passive building standards in line with EU requirements”
	Chapter 6- Realising our Island and Marine potential	
40	Regional and local development plans will take account of and integrate relevant maritime spatial planning issues	Amendment: Insert at the end of 40 “and must be based on and have access to the necessary expertise to do this.”
42	Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports are considered and addressed as part of the Regional Spatial and Economic Strategy (RSES) and that any concurrent or subsequent metropolitan area or city/county development plans and strategic plans for the Tier 1 and Tier 2 ports are aligned to ensure the effective growth and sustainable development of the city regions.	Replace 42 with: “Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports are considered and addressed as part of the Regional Spatial and Economic Strategy (RSES) and that any concurrent or subsequent metropolitan area or city/county development plans and strategic plans for the Tier 1 and Tier 2 ports are aligned to ensure the effective growth and sustainable development of the city regions. In addition to ensure that the Tourism and Leisure potential of our Major Harbour areas and Maritime towns are properly maximised.”
	Chapter 7- Ireland and the EU	
47	Promote the development of the North West City Region as interlinked areas of strategic importance in the North-West of Ireland, through collaborative structures and a joined up approach to spatial planning.	Amendment: insert at the end of 47 “such as through the development of the North West City Region (Letterkenny-Derry-Strabane) as a strategic metropolitan area in the National Planning Framework.”
	Chapter 8- Environmental and Sustainability Goals	
54	That the planning system is responsive to our national environmental challenges and ensures that development occurs within environmental limits having regard to the requirements of all relevant	Comment: Sinn Féin believes that the legislative framework for planning needs to be revised and reviewed regularly to ensure it is capable of dealing with the inevitable changes created by climate change and the

	environmental legislation and promotes the sustainable management of our natural capital.	need to create sustainable policies to counter climate change in the first instance.
57	Promote renewable energy generation at appropriate locations within the built and natural environment to meet objectives towards a low carbon economy by 2050.	Comment: Sinn Féin believes in the need to diversify renewable energy sources, utilising a range of sources. Only through a wide portfolio of energy options can we hope to be sustainable and also meet relevant international emissions and renewable energy production targets. This must take in the natural environment and rural communities that are most effected.
66	Statutory arrangements between spatial and transport planning in the Greater Dublin Area will be extended to other cities	Amendment: insert at the end of 66 “without in any way diminishing the existing powers of Local Authorities.”