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Submission Paper to the National Planning Framework –Draft Plan

Introduction

I regret that this submission cannot be as detailed and as comprehensive as I would like due to resource constraints

However I wish to make the carefully considered submission below in relation to the National Planning Framework. I am very concerned about the framework and hope that further consideration and debate will take place on it before being finalised. We live in a rapidly changing world where the changes in the next twenty years are likely to be even more dramatic than in the last twenty with new technologies making everyone, irrespective of physical location, connected globally twenty four seven. We must therefore plan for a world of greater choice and much more work flexibility and building a long term planning framework on the experiences of the past and even present assumptions could be a major mistake.

As George Bernard Shaw said “Some people see things and say why. I dream of things that never were and say why not”

1. The ultimate aim of all national policy should be the overall well-being and quality of lives of our people
2. Therefore in considering a National Planning Framework all aspects of people's lives have to be considered
3. The plan as proposed sees a much more urbanised country with the majority of growth taking place in and around five cities
4. The reason given for this is that "cities drive growth". Whereas this might be true up to the present there is no certainty, with pervasive high quality world class communications available in every house and business in the country, complimenting universal mobile services, that this will be such a dominant reality in the future
5. It is clear that multi-national FDI industries tend to cluster around our cities and around Third Level Industries. On the other hand most of our resource industries particularly in food, forestry and extractive industries locate outside our cities.
6. It is also worth noting that the proportion of employment located in our five major cities dropped slightly in the last inter census period.
7. A matter not examined in the plan is the potential to reduce pressure on our cities by locating as much state employment as is possible outside of the rapidly growing areas.
8. It should be an objective of the plan to develop all areas of the country to their maximum potential.
9. It should be an objective to ensure that all areas should have a proportionate access to capital and infrastructure investment rather than concentrating it in a small number of areas.

Cities

1. There seems to be a premise in the plan that our cities are generally successful and capable of handling rapid growth
2. In this context a World Bank report is quoted on page 23 of the planning framework as follows. **“The Reports core message is that density of economic activity is the most important dimension for economic development”**. There is no certainty with the development of the digital economy and continued challenges of congestion in cities that that will be the situation in the 21st century or that it needs to be the situation. The key driver here could be ensuring all areas have fair access to state investment in infrastructure, particularly communications infrastructure and their share of state employment
3. It is ignored in the plan that the vast majority of the most socially disadvantage communities are located in our cities and were previously designated under the RAPID programme for special attention.
4. These are the communities with the most crime, lowest access rates to third level education, highest drug abuse challenges, low employment rates and poor quality of life.
5. To increase the number of such communities through rapid urbanisation would not be good for the long term good of our society.
6. Urban areas are characterised at present by severe traffic congestion. There is no evidence in the plan that the proposed capital developments in transport will do any more than ease the current congestion for the present population. It seems very clear that there is no clear evaluation of the infrastructure and services that would be needed to accommodate the proposed transport needs of the population as targeted in the plan.
7. At present all our cities suffer from an acute shortage of housing. Again there is no evidence how it is intended to accommodate those who are already seeking housing in our cities not to mention provide the large number of extra units that will be required to accommodate the proposed population growth.

8. As an example Galway City needs about 3,500 houses per annum. Even in 2009 there was no serious surplus of houses and apartments in the city. Since 2011 virtually no new accommodation private and public has been built in Galway. That means that Galway needs between 15,000 and 20,000 more units of accommodation to accommodate its current population.
9. The five major cities in the state are all built on rivers in tidal zones and it would be important, particularly taking climate change into account including higher tides and more extreme weather events, that all developments in city areas, particularly in flood prone areas, would be proofed against possible long term flooding caused, either directly or indirectly, by the cumulative effect of development
10. Despite all of this the plan has as an **Objective 2b** the accommodation of half of the expected population growth around the five cities i.e. 500,000 people

Rural Areas

1. Most of the focus on rural areas is on towns not on the totality of these areas despite the fact that the vast majority of the population in these areas live outside urban areas
2. The chapter on the open countryside is written in obtuse and opaque language but as far as it is possible to decipher its provisions, it would appear to be based on a desire to limit dispersed rural housing severely and to implement this by introducing regulatory and legal barriers to rural housing and business development outside of towns.
3. On page 30 of the framework there is a clear statement of intent in the following statement “Support both urban and rural compact growth through a “smart growth” funding initiative and if required, through subsequent legislative/regulatory measures”.
4. On page 85 National Core Principles it says “The location of new housing provision is to be prioritised in existing settlements as a means to maximising access (to) a better quality of life for people through accessing services, ensuring a more efficient use of land and allowing for greater integration with existing infrastructure”.
5. On page 32 there is a clear message given to rural Ireland in the following statement “Practical experience and research shows that in an economy such as Ireland’s simultaneously fostering economic growth on the one hand and spreading it out smoothly or evenly across the country, is neither realistic or practical” Thus an

excuse is given to concentrate disproportionate resources in the major urban areas. This in turn creates a self-fulfilling prophecy.

6. On page 51 the following is said “National Policy Objective10: There will be a presumption that encourages more people, jobs and activity within existing urban areas..”.
7. Thus despite plenty of pious platitudes in the framework it is clear that the trust of policy is to disrupt and stifle growth of dispersed rural communities.
8. These are the communities that predominated Ireland for a very long time and they tend to be successful communities in terms of quality of life, social capital and access to third level education for young people growing up in them
9. Many are also the communities that can best absorb extra population as they have surplus capacity in their schools, sports facilities, health facilities, infrastructure etc.
10. The creation of a critical mass in these communities also strengthens them
11. The cost to the state of increased populations in rural areas outside of towns tends to be minimal on the following basis. In such circumstances the only subsidized cost of development by the state is the 50% subsidy for the provision of electricity from the nearest point on the system to the new house. Otherwise dispersed development tends to use the existing water services, roads etc. In the vast majority of cases the developer of a once off house provides at their own cost the full cost of the provision and maintenance of their own waste water system. Schools and other local services can in many cases accommodate extra growth without extra provision of places.
12. For this reason the strong bias and presumption against the dispersed village traditional in Irish society does not seem to be in the best interest of society as a whole and of those who wish to make a permanent home there.
13. At the heart of a lot of debate around settlement are two premises that seem to run contrary to

each other. On one hand it is maintained that more and more people want to live in towns and cities and on the other hand despite this it is felt that strict control has to be kept on those who wish to settle in traditional dispersed communities.

14. What this would seem to indicate is that there are many people who by choice would like to live outside of cities and towns.
15. The plan does not make any provision for the development of employment outside of nucleated settlements and this should be reversed in the final plan.
16. This chapter should be totally re-written and the final plan should take more cognisance of the contribution made and being made by those who live in and/or came from the dispersed villages around the country to the economic, social, sporting and cultural wellbeing of the country.
17. There is a need to recognise more fully in the framework the huge potential for the expansion of rural employment in sectors such as the public and civil service, resource based industries, creative industries, distance working including home working on the internet, industries based on local skills and knowledge, rural and marine leisure to name but a few
18. Many small and medium size towns have been in decline for some time even in areas of overall growth in population. The future functionality of such towns needs to be examined to plot a role for them in the Ireland of the twenty first century.
19. Before the final adoption of the plan the Minister should seek to engage with the newly formed Oireachtas Committee on Rural and Community

Development on the proposals for rural communities in the plan

The Irish language, Gaeltacht and Islands

1. Despite short mentions of the Irish Language, Gaeltacht and the Islands and the lofty ambitions for them there are no specific provisions in the plan as to how they might be protected and strengthened. From a spatial planning point of view there are also no provisions in the plan as to how the Gaeltacht can be developed as strong vibrant language communities. This is particularly so in relation to the Connemara Gaeltacht which will come under severe linguistic pressure due to the planned expansion of Galway City.
2. There is a need for clarification in the framework as to whether language requirements, as at present, will continue to be a feature of Gaeltacht planning in order to preserve the linguistic heritage of these areas
3. A new chapter should be written on both the Gaeltacht and the Islands with clear provisions and national planning policy objectives that will ensure that the ambition of the 20 year strategy for the language will be achieved.
4. The Department should engage with the Oireachtas Committee on the Irish Language, Gaeltacht and Islands on the proposals before the finalisation of the plan

Travellers

Although there is a reference to travellers on page 82 of the framework there are no specific National Planning Objectives in relation to travellers in the plan

There should be such specific provisions in the final plan and in particular actions that ensure that local authorities cannot neglect their responsibilities in relation to traveller accommodation needs

Infrastructure Provision

1. There is a need in the plan to affirm the commitment in Transport 21 to prioritise development the coastal national secondary routes along the Wild Atlantic Corridor as these communities are the furthest away from the national primary road network. (These roads are the N56, N59, N67, N68, N86 and N70)
2. There should be a clear commitment in the plan to upgrade all national primary roads to dual carriageway/motorway standard within the time frame of the plan to ensure that the entire island becomes accessible on good quality roads and to ensure development of the whole of Ireland.
3. The national primary road network should not be seen as inter-urban routes (MIU) but inter regional routes (MIR) as much of the traffic on them either originates or terminates, or both, outside of the cities
4. There is a need to provide in the framework for the development of commuter rail into Cork, Waterford, Galway and Limerick along existing rail lines including the Western Rail Corridor to accommodate projected population growth in these regions.
5. There is a mention in the framework of the need to develop the road north of Tuam into the North West. As this region is the most underdeveloped region in the country this should be done on a bi-modal basis – rail and road, and it should be front loaded to ensure that this region gets a chance to catch up economically with the rest of the country. The road development should be of dual-carriageway/motorway standard and should stretch from Tuam to Letterkenny. The rail development should be done in two phases, with the first phase being the development of the WRC to Claremorris and the second the development of the section from Collooney to Sligo. The provision of this infrastructure should be seen as an economic driver of the region.
6. There is also an urgent need to upgrade the radial links from Dublin and Belfast into the region of the West/North West as a matter of priority.

7. Fibre and Mobile Roll Out: To ensure that all parts of the state can develop at the same time there is an urgent need to provide fibre connections to every house and business in the country and to ensure high quality voice and data mobile services in all areas. The delay in this is causing a digital divide that is totally avoidable and is forcing migration to areas of high quality service.
8. On page 73 in relation to connectivity in rural areas there is no mention of road and rail developments. Other than broadband the only policy objective in the framework relates to Greenways and Blueways Strategy as follows: **National Policy objective 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. This is an extraordinary omission**
9. Ports: At present there is no national port designated between South of Limerick (Foynes) and Derry along the west coast. This leaves an extraordinarily long stretch of coast without a national port. **It should be a policy of the framework to designate Galway Port as a Tier 2 port immediately and to develop it as a strategic asset for the west coast.**

Chapter 9.

Chapter 9 lays out the governance and implementation arrangements proposed for the Framework. As expected the vast majority of investment and implementation priority is directed towards the five major urban areas. This is unacceptable.

This chapter should be reviewed to ensure all areas can reach their potential

An example of the urban centric view of things is the following sentence

“Improving average journey times targeting an average inter-urban speed of 90 kph.” The plan seems to imply that this type of connectivity is not needed for people travelling around the country from and to non-urban centres.

There is a lack of commitment to the North West on page 133 where only minimal developments are proposed for roads in the North West between now and 2040 instead of guaranteeing that all National Primary Roads in the region would be upgraded to dual-carriageway/motorway standard in that timeframe

An example of the Dublin centric focus is that the only specific airport and port developments relate to Dublin. As well as that there is uniquely for Dublin a commitment to implement the **Transport Strategy for the Greater Dublin Area 2016-2035** in the framework

Conclusion

This framework requires a re-think and fresh debate. I hope that this will happen and that voices of those not heard to date will be heeded. To ensure this I suggest the Department organise meetings in community centres up and down the country and consult directly with the people. To rush the adoption of the plan without such consultation could lead to long term divisiveness and opposition to spatial planning.