

John Spain

31st March 2017

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

Dear Sir/Madam,

Submission on the Preparation of Ireland 2040 Our Plan – National Planning Framework

I greatly welcome the initiative of Minister Coveney and the Department to launch the consultation on Ireland's 2040 – A New National Planning Framework.

While there are significant challenges in accommodating the extent of future growth and development envisaged, these challenges also present some important and exciting opportunities. Ireland 2040 must provide an appropriate framework to meet these challenges while maximising the opportunities for the enhancement of the sustainable economic development of the country and improving quality of life.

I fully concur with the statement in 'Issues and Choices' that the key objective must be to facilitate population growth within a sustainable planning framework, minimising sprawl and congestion whilst strengthening cities, towns and villages. I respectfully submit that the key to achieving these objectives is to focus on how this development is delivered within our existing towns and cities rather than where growth is focused nationally.

In other words, the key issue is not so much whether development takes place in the eastern half or western half of the country, or indeed the northern or southern part of the country, rather it is ensuring that the development takes place in an integrated co-ordinated and sustainable manner. In particular, this involves a clear commitment to a very significant step change in the level of investment in high quality public transport in Ireland to deliver a fully integrated high quality public transport system nationally. This will involve very significant government investment in high speed

railways between the major towns and cities, as well as a much greater focus on high quality public transport provision within larger towns and cities and urban areas.

Public transport is a key area where Irish cities and towns are most disadvantaged compared with competing countries and cities internationally. This seriously affects our future economic development potential, the achievement of sustainable development goals and the quality of life for all citizens. There is an urgent need for a highly ambitious national public transport investment plan.

I am aware that there is very significant potential to accommodate much of the anticipated population growth within our existing built up urban areas by making much better use of regeneration areas and brownfield sites in both in public and private ownership.

For example, Dublin and Cork Docklands represent outstanding opportunities for high quality urban development with significant positive place making, offering well located housing and employment opportunities and a broad range of other lifestyle opportunities, including leisure, cultural and entertainment activity.

We note for example, that the consultation document refers to success in this regard to date in Dublin Docklands and in the vibrancy and draw of cities like Galway and Cork. However, far more can be achieved in this regard with greater ambition and vision.

Dublin Docklands is currently being developed at exceptionally low densities which cannot sustain the type of vibrancy and activity which is sought and only makes a minimal contribution to sustaining the very significant public transport investment that is needed in the Dublin urban area, i.e., projects such as Dart Underground and Metro North.

Equally there are very substantial tracts of land in Cork Docklands which can only be realised following significant public infrastructure investment.

There is also very significant potential for location for housing and employment opportunities throughout inner cities central areas of our larger towns.

Much of the north-east, north-west, and south-west inner city areas of Dublin contain significant opportunities for both public and private sector land holdings which are only being partially realised and to a larger extent are being by-passed by outward housing development which is easier and less costly to deliver.

To reverse this trend requires an understanding of factors that lead to new residential development being focused outside of and in the hinterland of our major towns and cities, rather than within them. Investment in infrastructure provision and creating a high quality urban environment and facilities need to be addressed in a coherent and integrated manner.

Balanced Regional Development

It is extremely difficult and challenging to successfully intervene in market forces driving development patterns nationally and redirect growth to other areas of the country while still delivering on the opportunities that growth presents for the country. Past attempts to do so in the former NSS for example, have been largely unsuccessful.

To be successful, such initiatives to divert growth and population and employment away from the centres to which it is naturally attractive to other centres, requires very significant market intervention and in particular, very significant central government expenditure on integrated co-ordinated urban development, including infrastructure and associated cultural entertainment and leisure facilities, public transport, roads, water services, all of which can only be achieved if done in an integrated manner by the establishment of new development agencies.

Examples of where this has worked to an extent include the new town developments in the UK in the 1950's to 1980's where new town development corporations were established. However, by contrast, no new structures, institutions and indeed no new funding was made available for the development of the "Gateway" town centre in the previous NSS. Therefore, it is not surprising that this strategy was largely unsuccessful in achieving its objectives in this regard.

There are fundamental difficulties in establishing such a framework, including pressures to provide for growth in all areas of the country to the same extent which is clearly not feasible.

Therefore, it is respectfully submitted that the focus should be on developing and enhancing the existing economic and urban assets of the country for the benefit of the entire country.

It should be recognised that Ireland is a relatively small country and in fact is only on the scale of a region which would be found in other larger countries such as Germany, Britain, France or Canada. The focus therefore, should be on the sustainability of development of the entire country, rather than distribution or redistribution of development within the country.

Key Issues:

It is respectfully submitted that the key elements of the new National Planning Framework should include:

Greatly reduced travel time by rail between major towns and cities and in particular the rail lines linking Dublin to Belfast, Cork, Limerick and Galway, with upgrades of the rail lines to Waterford and Sligo and the branch lines in Kerry and Mayo

An urban development framework which places much greater emphasis on public transport provision, providing very significant investment in high quality new public transport infrastructure in existing and proposed new development areas.

In Dublin, the emphasis should be on delivery at an early stage of previously much anticipated projects such as Dart Underground and Metro North along with developing an integrated tram network across Metropolitan Dublin. Trams are particularly well suited the prevailing urban densities in Dublin.

The major airports should also be served by a much higher quality of public transport and which should include rail based services. For example, there should be an hourly high speed train service linking Belfast-Dublin Airport-Dublin City Centre to Cork (using Dart Underground tunnel), connecting to Waterford, Limerick and Galway. This will bring all of our major cities and many towns within easy reach of each other and of the capital city and of the main airport of the country. This will also lead to the economic benefits of the thriving and rapidly expanding eastern region to be accessed more easily throughout the country. Greater connectivity is the key to a balanced sustainable development environment.

Ireland has, throughout the history of the State, seen serious under investment in public transport and the results are very clearly evident, not least as seen in the severe daily congestion seen on the M50 and across the roads in Dublin city centre and other cities. This can only be tackled by very significant levels of investment in new public transport infrastructure in the early years of the new National Framework Plan, investing at a level which has never been seen or envisaged previously.

The answer is not to restrict the future development of Dublin due to road traffic congestion. We are already seeing significant employment creating projects being refused planning permission due to the seriously inadequate transport network in Metropolitan Dublin, usually as they are considered 'premature' pending some future transport project with no clear timeframe.

There are great opportunities for the country which simply cannot be realised in the absence of a step change in public transport investment. The country will be developed in a manner which results in gross unsustainable urban sprawl and congestion, diminishing quality of life for all. The question is not whether we can afford this investment in public transport – we simply cannot develop much further as a country without it.

Particular emphasis should be placed on the regeneration and upgrading of town centres, city centres and inner urban areas throughout the country as a focus point for living and employment. This would require significant investment in public realm upgrades, integrated public transport and investment in cultural and recreational opportunities. The aim should be to make our cities amongst the most desirable in the world to live in and the most successful economically.

Rural Development

Ireland has one of the most attractive natural environments in Europe. There is a great opportunity for the future economic prosperity of rural areas through the protection and enhancement of these

environmental qualities, including the protection and enhancement of our numerous outstanding landscapes.

This goes hand in hand with the approach which requires greater consolidation of development in rural areas within existing small settlements. Our rural towns and villages have suffered severely from a “hollowing out” process whereby the many residents and in particular, better off residents, who have relocated and continue to relocate to the surrounding rural areas, leaving under investment and in many cases, vacancies and dereliction in the centre of smaller towns and villages while at the same time, damaging our environments and landscapes. For the future success in terms of quality of life and prosperity, it is essential that this process is reversed. Appropriately designed rural housing will always have its place within this framework.

The future economic success of many of our rural areas lies in making much greater use of the environmental assets and opportunities they offer, in particular for active sports and activities.

This involves a national programme of investment and development of, for example, significant walking routes, cycling routes, greenways and other recreational activities, in a manner which is environmentally sensitive and sustainable.

There is a need to upgrade access to these more remote regions including simple measures such as the bringing the surfaces of principal roads in more remote regions up to an acceptable standard, providing necessary bypasses and upgrades of the many seriously deficient road sections linking remote areas to the main urban centres (e.g sections of N71, N72 etc).

Access to recreational activities such as walking in rural areas has long been a contentious issue and successive governments have failed to tackle this issue to the detriment of the quality of life of and the economy of our rural areas. Ireland is very disadvantaged in this regard compared with other European countries as a result of decades of inaction on this issue.

Ireland’s great potential to be a leading centre in Europe for active sports and tourism can only be achieved by a coherent policy framework and sustained government investment in access to and within rural areas and related facilities.

I trust that these comments will be taken into consideration in preparing Ireland 2040.

Yours sincerely,

John Spain