

**“IRELAND 2040 – OUR PLAN” | SUBMISSION TO DRAFT NATIONAL PLANNING FRAMEWORK
TULLAMORE & DISTRICT CHAMBER OF COMMERCE**

10th NOVEMBER 2017

Introduction

It is most efficient when people live close to high quality employment and service clusters. This is the central point of the draft NPF. It is one that gives high regard to efficient delivery of services, quality of life and environmental sustainability. The logic and ideology underpinning the NPF is to be commended.

Promoting increased urban density requires political will and statutory oversight. This is rightly emphasised in the draft, but while the NPF will assuredly exert hierarchical influence over future development plans, it is of utmost importance that horizontal integration of the NPF is extended across all departments, agencies and bodies with direct oversight and budgetary controls over distinct infrastructural areas such as transport, healthcare and foreign direct investment, for example.

Promoting increased urban density requires sufficient levels of investment in key enabling infrastructure. Crucially, the NPF will set the context for a new National Investment Plan (NIP) 2018-2027.

When finalised, the NPF will impose hierarchical influence over future regional and county development plans. False assumptions contained in the current draft, which potentially limit scope for growth in individual towns or regions, must be eliminated from the final document.

Key Feedback Points

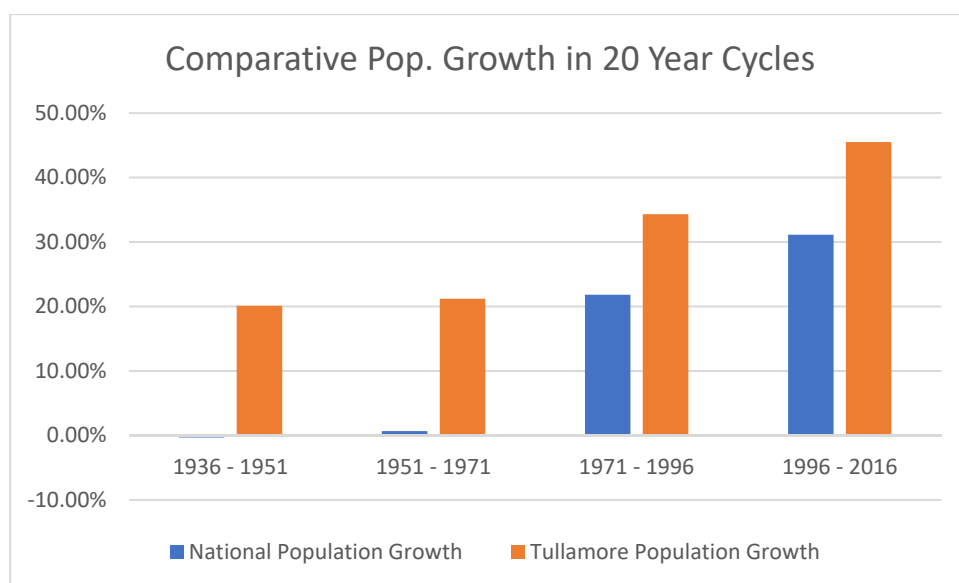
Tullamore & District Chamber demands the four Midland Regional Assembly counties be designated as a “Region Within a Region”, where towns with >10,000 population are prescribed a minimum population growth target of 40%, like those in the North-West Region. This demand is justified as follows:

1. **The National Context:** ESRI¹ recently forecasted national population growth of 1m (23%) to be achieved by 2030, not 2040 as forecast in the draft National Planning Framework.

¹ Projections of demand for healthcare in Ireland, 2015-2030: First report from the Hippocrates Model (Chapter 4)

Therefore, the NPF's fundamental assumption regarding national population growth appears to be superseded already; who knows what Ireland's population growth to 2040 will be? In any event, it appears likely that any large town which achieves 20-25% population growth between 2020-2040 will be marginally behind the national growth average, not ahead of it. This is a concern because of the hierarchical influence which the NPF will exert on future local development plans. There is a danger that setting a population growth target of 20-25% for large towns will lead to de-zoning of existing zoned lands, particularly in the former "Midland Gateway" towns. In said towns, a near doubling of population was envisaged under the National Spatial Strategy, and certain infrastructural spare capacity now exists because of investments successfully delivered under the auspices of same. While there is ideological justification for limiting the allowable growth of dormitory towns in the GDA which have underdeveloped urban cores and limited local employment relative to existing population, the Midland Region needs its own self-sustaining growth centres with unique employment pull-factors. It is not sustainable for the four Midland counties to be parasites of Dublin. Subjugating the Midlands to Dublin only serves to exacerbate Dublin's sprawl.

2. **The Historical Context:** The draft NPF deals with a 20-year development cycle. Tullamore's population grew by 46.6% in the last 20-year cycle 1996-2016. The last time Tullamore achieved growth as low as 20-25% in a 20-year cycle was the period 1951-1971 (21%). To put that in context, national population growth in the same period was less than 2%. The growth of large towns has historically been, and should continue to be, well ahead of the national average.



3. **The Competitive Context:** The Midland Region has the lowest GVA² output, lowest level of 3rd level education attainment and by far the lowest level of FDI employment³ of any region in the Republic of Ireland. It is false to suggest that because we are included in the Eastern & Midland S.P.A., our demographics, infrastructure, urban build-up or economic output is comparable to that of the GDA. Despite our proximity to Dublin, we have more in common with the North-West (formerly a peer of the Midlands within the BMW region) where a growth target of 40% has been prescribed for towns with populations >10,000. Without specific designation for the principal towns in Longford, Westmeath, Offaly and Laois, and targeted investment to back up that designation, the economic pull factors of a thriving Dublin pose a competitive risk⁴ for the Midlands' principal towns. The arrangement currently proposed in the draft NPF, albeit unintentionally, effectively promotes exacerbation of the daily tidal commuting pattern out of the Midland Region to employment in the GDA which the NPF supposedly seeks to eradicate. Not only is a population growth target of at least 40% required for the large towns in the Midlands to avoid competitive stagnation, even greater job growth targets need to be set for the region to secure economic sustainability and liveability of towns.

Making the Case for Growth in The Midlands

Behind the negative statistics, there is a positive narrative which champions the future of the large Midland towns.

- Athlone IT is on a development pathway to Technological University status
- Tullamore Hospital is on a development pathway to University Hospital status
- The former “Gateway” towns have already been primed for growth with adequate urban zoning, designated infill/brownfield opportunity sites and future-proofed infrastructure
- 70% of Tullamore residents enjoy a commute to work of less than 30 minutes – twice the national average⁵. Is this not Ireland’s ideal live-work model?
- Communities are mature, and collaboration is strong
- We are a centre for Ireland’s renewable energy production.
- We have strong clusters in services, food production, med-tech, construction etc., all of which complement the build-up of cities, rather than compete with same
- All large towns in the region are served by Intercity Rail

² Action Plan for Jobs 2015-2017 Midland Region (Chapter 3)

³ IDA Annual Report 2016 (Page 8)

⁴ Ireland 2040 Our Plan Draft National Planning Framework (Section 1.4)

⁵ Central Statistics Office - Census 2016

- The Parteen-Dublin water line will provide sustainable water supply to towns adjacent to its route.
- 40% population growth in Longford, Athlone, Mullingar, Tullamore and Portlaoise is modest in real terms, just 35,500 people combined. Population build-up of this magnitude will have zero negative impact on any city, but is crucial to ensure the future sustainability of communities in the Midlands.

Key Enablers

- Specific designation of the Midland Region as an area in need of Tier 1 infrastructural funding
- Enhanced North-South interconnectivity between the principal towns, particularly the N80, N52, N4, and N55. Aspects of the required upgrades are shovel ready and would contribute towards a long-mooted Sligo-Rosslare national corridor.
- Intercity rail lines to be electrified and continuous twin track at least, if rail is to provide a realistic and environmentally sustainable competitive alternative to private motor vehicles.
- Population build-up needs to be prioritised and incentivised within town centres and around transport hubs such as train stations. A funding model to promote extensive re-purposing of derelict commercial premises and townhouses with infill capacity should be made available.
- PPP funding incentives for high quality and innovative development of town centre opportunity sites, as designated under local development plans.
- PPP/community funding incentives for development of competitive local industrial property offerings. Increased funding for IDA to directly develop advance facilities on a broader scale.
- National budgetary alignment with the EU average for public capital investment, as a proportion of GDP
- Enhanced alignment and limited integration of the four local authorities at executive level to improve coordination of regional oversight and implementation
- Address structural weaknesses inherent in the planning system which could hinder successful implementation of the NPF across regional and local levels. Achieving compact growth of population, jobs, housing, together with the associated infrastructure, will be dependent on a range of actors and agencies formally aligning with and buying in to the NPF.
- Establish a schedule of regular review intervals to measure actual v prescribed performance of the NPF. 7 year intervals would be ideal as it reflects the planning to delivery cycle of major capital projects.