



## Ireland 2040 Our Plan - Issues and Choices

### National Planning Framework

#### A submission from the Dublin PPN's

##### Introduction

The four Dublin Public Participation Networks have come together to make this submission to the Issues and Choices Paper, Ireland 2040 – a document that aims to construct a National Planning Framework that will replace the suspended National Spatial Strategy. All the members of the four PPN's in Dublin have been contacted and asked to make submissions to this process and 93 replied with comments. Discussion on the topic has taken place between the four PPNS and this document outlines the views expressed for this process.

The focus of this presentation is from a Dublin perspective, though the membership of the PPN have recognised a need for rural development, balanced development and the need to take national priorities into account.

The PPNs elect members to the decision making bodies on the various local authorities in Dublin and the core questions asked of the membership revolved around the key policy issues that SPC are focused on, namely planning, housing, transport, communities / place / parks recreation and sport, economic development, environmental sustainability. In the responses received a much wider range of issues were raised and, in some policy areas, there were divergent opinions emerging, as one would expect. This submission takes a broad based approach and this is the general consensus opinions that emerged from the process.

It is worth noting that very few people know anything about the NPF or the NSS. What they do know are the issues that they and their communities live with. They have strong opinions on community need, the development of Dublin, what is missing from Dublin, the need for positive environmental policies, and the development of a more equal, sharing and caring society.

##### Background

The PPNs in Dublin believe in the shared national development goals as outlined in the consultative document. These are:

- Improved living standards
- Quality of life
- Prosperity
- Competitiveness
- Environmental sustainability

It is important to link these goals to places. All places. If we are looking at how Ireland should look in 2040, it should be a very different place than we have today. Many of the goals outlines above

have been articulated in multiple policy documents over a prolonged period of time. Few have been delivered, and most have bypassed significant swaths of our population. If we, as a country and society, are to be realistic in seeking to deliver these stated goals, then the new National Planning Framework (NPF) must be a statutory document and must be implemented across all arms of the state with the cooperation and input from civil society.

While the consultative document correctly outlines (2.1.3 and 2.1.4) that much has improved in Ireland since 1990, this has not been spread evenly and many of our citizens are welfare dependent and excluded from mainstream society. We have a level of persistent long term unemployment poor access to public services, such as: - health, mental health and public transportation. There is a level of urban social isolation in many of our more deprived areas. Participation levels in elections and general society are low. This is a challenge to our national democratic system and needs to be addressed by a multi-functional approach. Many areas are unfinished and desolate. The NPF has to address issues that have allowed this to occur in the past and redress poor planning and design from decades ago. Reinvestment in these areas, with a focus on brown field development, regeneration and overcoming low income and monolithic type areas is necessary if the NPF is meet its started goals outlined above.

The recovery from the economic collapse has been uneven and for many an illusion. Many of the most deprived areas in the City suffer from urban decay and have little or no community facilities. Budgets for local development activity in urban areas has been constantly reduced in real terms over many years, despite the real need that exists there. Restrictions on how it can be spent have grown and local need has been ignored or designed out of programme design.

Hope and vision in many deprived areas have been extinguished. Recovery has been focused on those that can engage effectively and those that already have resources and capacity. One area that has had substantial development has been Ballymun. Yet with over €1bn invested, the regeneration project remains unfinished. The core central area where economic activity and community facilities can be located (as well as housing for higher income earners) is a desolate mess, particularly around the former shopping centre area and the open field where the new centre was to have been developed. This is a wasted opportunity for an area that is crying out for completion before it slips back into deprivation once again. This is but one area in the GDA that needs substantial investment. The development of coherent central areas that act as town centres within the GDA area (and we are no talking about shopping malls whose presence is often a blight on the receiving environment) is essential. It is about place making.

Spatial Planning needs to look at the errors of the past and rectify the damage done by reinvesting in existing areas and not just look at new shiny projects. People live in these places and they deserve to have opportunities and a reasonable quality of life. Many areas in Dublin have shifting population movements and differing demographic profiles. The needs of the elderly are not catered well for and potential solutions to housing needs are not being addressed. Areas have been designed for a monolithic community, which in all reality they just do not exist. Allowing people to remain in their own communities while also being mobile in addressing their housing needs is an issue that has to be addressed.

## **Core Comments**

This document is to be welcomed and much in it is worthwhile, but some of the thinking and analysis in it is flawed and misconstrued. This state is made up of multiple different parts and areas, all of which have their own working parts. This too is the case in Dublin. While the consultative document looks to our future needs and development potential, it must look back at what has been done to people and communities and try to resolve real and existing problems. We have an incoherent transport system, that despite years of policies indicating a preference for walking, cycling and the use of public transportation, we have a car dependent population. Our public transportation system is primarily centre based, yet the needs of people in a city are more complex than that. People travel to work, much of which is located at the edge of the city. Many who live a short distance from the Airport, for instance, if using public transportation have to travel to the city centre to go back out. This is replicated throughout the GDA area. We have a GDA area that is suffering a housing crises and homelessness while simultaneously having no capacity to spend money that is there to resolve it. The domination of a focus on home ownership, a fear of state involvement in the housing sector (social and rental) and a rental sector that is inadequate and inappropriate to the needs of people, prevents this housing crises being resolved. The inability of policy to address persistent and critical issues is shocking and has condemned many of our citizens to live in dreadful conditions. This is replicated in numerous policy areas.

## **Effective Regional Development**

There is a core element of this document that denies the world wide and Irish move towards urbanisation. There is a presumption towards the development of Dublin (not fully explicit). The need for balanced development is a good concept. A better one would be effective Regional development. This needs to be spelt out and it needs real flesh on it if its to be real and measurable. Balanced Regional Development has been in many Irish policy documents over decades, but has neither been defined well nor has it been delivered. Can it be delivered or do we need to redefine our priorities and be honest about what is possible and desirable.

The analysis around comparisons between Ireland (Dublin) and other comparable countries (cities) is not always accurate. Take the comments on cities in Scotland for instance. Many of the other smaller cities mentioned are satellites of Glasgow. Indeed, Edinburgh is just 75 miles away and many other of the towns included in the list of urban areas are clustered around Glasgow and Edinburgh. To get a population for Dublin of 1.6m, people places such as Drogheda (60 km from Dublin) and Naas (36km from Dublin) and a range of other such centres must have been included. The Dublin area is not defined in the document. The comparisons lead to over emphasising Dublin's relative size and economic power.

The NSS looked at far too many centres. The new NPF needs to be much more focused and major development restricted to the development of Dublin, Cork (with possible links to Limerick / Galway) along with national priorities for a protracted period of time. A different development pattern needs to be developed for other towns, villages and rural areas.

Any future national capital investment programme (central and agency) needs to be focused on these few key cities. Any infrastructural programme needs to be focused in these areas to

- Ensure these cities and their hinterlands can get to a level of sustainable economies of scale
- Dublin (GDA) can address its emerging diseconomies of scale and grow its infrastructural capacity so that it can become a serious economic entity on an international basis.
- Allow these cities develop their core town centre areas with a mix of retail, commercial and residential making them vibrant and lively places to live and work. Investment and development should be focused on the key areas within these cities for a period of time until a critical size can be reached and they act like dynamic areas.

Other towns and villages with their rural hinterlands need a coherent plan to assist their development allowing them to grow, where appropriate, or stay stable as far as practically possible in a realistic and coherent way and not on the basis of hopeful aspirations or lines in a policy statement that cannot be delivered.

### **Local Government Reform Has Been Inadequate to Date**

The consultative document indicates that there has been reform of local and regional government. This reform has not been adequate. Strong Regional Authorities (Assemblies) with realistic powers and a string of well-resourced Local Authorities with enhanced powers is needed to deliver the NPF. It is also important that national and regional bodies align their structures and investment priorities with the regional and local government structures and the NPF priorities (health, education, housing, industrial development and policing in particular). There is a need to define the GDA and put a governance structure in place to develop and deliver strategic investment programmes (transport, waste, education, health and policing).

### **Implementation**

A set of interdepartmental and cross sectorial teams need to be put in place to a) monitor and b) implement the NPF. These teams need to be drawn from different Government departments, Regional Authorities, state bodies and key NGO's. It should have an Oireachtas oversight committee and be a statutory document.

### **Priorities**

As a backdrop to this NPF, a strong emphasis has to be put on

- Addressing climate change
- Allowing our cities compete internationally
- Being flexible enough to allow the country take advantage of key international economic changes and changing economic circumstances
- Addressing development on an island wide basis
- Creating of a sustainable and equal society

The conflict of continued economic development and addressing climate change has to be addressed through a more coherent development pattern.

- The GDA has to be developed in a more planned and sustainable way.
- Integrated Land use and Transport planning has to be central to this
- Public transportation has to be the overwhelmingly prioritised in all plans and planning schemes

- Cities and key towns in the GDA have to grow from the centre out with key priority areas being identified and managed by stronger governance structures
- Strong identifiable areas designed to allow communities emerge, rather than be driven by elongated never-ending housing estates which become like housing tundras
- That employment policies will include opportunities for people of differing skill levels and in disadvantaged areas

### **Rural Development**

The role of rural areas and rural towns need to be addressed honestly. There has been a prolonged movement from rural to urban areas. The development of one-off housing and remote living has made it more difficult to deliver sustainable services and social services. It has also made it more difficult to address the decline of rural villages. The delivery of national infrastructural investment programmes has been made more difficult to deliver. Appropriate development in rural areas is to be encouraged. What is appropriate and what will sustain rural areas and rural life has to be defined and sustained by national expenditure and transfers from the exchequer. Larger towns and small cities need to address the poor structural development that took place in the Celtic tiger era. It is necessary in the period covered by this NDF that a more coherent development pattern should be followed and promoted.

### **Comments under Policy Headings**

The following are a selection of comments from PPN members grouped under the Policy Headings

#### **Transportation**

- The GDA needs a state of the art public transport system
- This system needs to address the requirements of the citizens, not those who designed existing routes
- The system has to be promoted and prioritised above car based solutions and be accessible in terms of price and location
- Motorway development in and around Dublin has been very disruptive to many communities and has created noise and air pollution for those living in proximity to them
- Road development has severed communities
- Quality provision for cyclists (segregated cycle routes are advisable)
- Introduction of more cycleways
- Making cycling safe (multiple strong contributions on this)
- More connectivity to public transportation routes
- The development of public transport hubs inside and outside Dublin
- More interchangeable routes
- Better links to different areas (work and travel patterns have changed while transport routes have not)
- Transport in the GDA needs to be more available at night
- Address the congestion that is appearing on the M50 and other motorways around the city (public transport an option but capacity is being reached due to car based travel system we now have)
- Link areas severed by roads with pedestrian bridges (and do not sever more communities)

- Address over provision of unused surface car parks in suburban areas and promote shared parking areas for general use (better planning and more open used space)
- Introduction of congestion charges should be considered
- More rapid type transport systems – LUAS and BRT
- Reduce access to city and town centres for cars
- Develop the Dublin Bike scheme and spread it out more (subsidise it as it makes more sense to promote this than develop more roads and subsidise cars)
- Orbital bus routes
- Better location of public utilities that make journeys and connectivity much better

### **Environment**

- More sustainable living promoted
- Address Environmental issues
- Water conservation promoted
- Roll out of sustainable energy initiatives, particularly on new builds but also through retrofitting
- Address issue of biodiversity and do not leave areas sanitised as concrete jungles
- Build in more central areas and stop the sprawl
- Better incentives and education to reduce waste, promote energy and water conservation
- Incorporate the Sustainable Development Goals and climate change commitments into the NPF

### **Community, Place Arts and Recreation**

- There needs to be more localism. Deliver for local areas and make them attractive places to be
- Less focus on big new shiny projects and more on existing areas
- More focus on the needs of people (all ages)
- Take more time to listen to people (this involves briefings and education to allow positive contributions to be made) – effective consultation and engagement
- People feel they are ignored and left isolated – policy takers
- Make definable areas and make them attractive and nice places to live
- Creation of functional green space (parks that have a function)
- Creation of quality spaces and a strong emphasis to design (shops, public and commercial buildings that impact on where people live)
- Development of better sports and recreation facilities focused on local areas – they are important to place making
- More public spaces - all public spaces should be available to all to enjoy
- Making places accessible and welcoming for people with disabilities and people of all ages
- More pedestrianisation of core areas in city / town centre and core areas
- Encourage higher densities to ensure you can get better public transport and other community facilities into areas
- Make areas safe enough for children be able to cycle to school

- Use the coastal areas for sport and recreation in a more intensive way (this needs to be promoted and supported)
- Some areas are overloaded and destroyed by traffic (e.g. Phibsborough) and these need to be rescued
- More planting of trees and greening of the GDA
- Promote more bio diversity in the GDA and make people aware of it
- More greenways in the GDA (walking, cycling and creation of places along them for community and enjoyable activity)
- Build community facilities along with new developments and do not wait for them to follow – which seldom happens
- Better protection and enhancement for our heritage areas
- A programme of building swimming pools and other sports and community facilities around them
- Maintain our connectivity to scenic areas while also protecting them of overuse and over development near them (e.g. mountains, country side and costal areas)
- More community gardens and urban farms

### **Housing**

- Address the housing shortage
- Build from the centre out in each of the developed areas so that there is access to services and better transport and vitality in areas and less dereliction
- Address the issue of sustainability in the rental sector – tenure and price
- Putting too much social housing in the one location can be problematic and areas that are predominantly social housing do not attract good quality investment
- Address the housing crises
- Use different technologies in buildings to reduce cost and promote more energy efficient homes
- Higher densities and higher buildings in appropriate areas

### **Planning**

- Stronger emphasis on planning control so that impacts of poor actions by individuals can be halted and the impact on communities can be reversed

### **Economic & Education**

- There is a need to link Education, Employment and Training strategies to the NPF to make it coherent and deliverable
- The introduction of a vacancy tax on empty buildings or partially empty and empty houses (including penalising public bodies)
- Incentivise local business to set up in local areas
- Provision of small enterprise space in local areas
- Introduce rates on public buildings
- Greater emphasis on equality

- Greater emphasis on developing a capital investment programme to develop infrastructure
- Better economic planning and link to NPF
- Invest in social infrastructure to build social cohesion and economic development for poorer areas
- Move to a low carbon economy with greater speed
- Address excessive insurance costs that prohibit actions being undertaken
- Quality education facilities that can be shared and used by the communities in which they are linked to
- Outreach from third level and continuing education bodies
- Continuing education for all
- Support the circular economy

### **General Comments**

- More inclusive society
- Have quality of life issues prioritised
- People are different and planning for diversity and diversity of need is critically important

The Dublin PPNs hope that these comments will be helpful in the drafting to the NPF and we wish you well in your important work.

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