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To: RSES
Subject: Submission to the draft RSES
Attachments: draft RSES. Submission from Judy Osborne.pdf

Please find submission attached.

regards Judy Osborne (MSc Spatial Planning)

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To rses@emra.ie

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Submission to the draft Spatial and Economic Strategy for EMRA.

As an independent planning consultant in County Wicklow I have been making submission to national, regional and local plans since 1999 and have watched the development of spatial policy since that time and made a pre-draft submission to this RSES

As part of the Wicklow Meath Kildare Planning Alliance I watched the adoption of the first National Spatial Strategy in 2002 and its dilution from the original proposals (in the background papers) by the Department, regional and local councils.

The WPA argued repeatedly that the population that each county was expected to accommodate was unrealistic and that zonings were at least double what would actually be required. We argued that the rapid development in some areas would be beyond the capacity of the physical and social infrastructure.

Our analysis at that time has been shown to be correct, as many villages and small towns have not benefitted by the addition of new housing estates on the periphery. It has simply led to an increase in commuting and car dependency with all the associated ills.

Since those early days there have been huge improvements in the quality of county development plans and national strategies and now, although I and a number of other commentators, believe that the prediction of population growth may be inflated, **I would like to offer strong support for the draft Strategy in so far as it seeks to focus growth in county Wicklow** on just 2 key areas so as to efficiently spend the limited infrastructural funding.

In particular, in County Wicklow, the WPA argued that the designation of Newtownmountkennedy and Kilcoole as medium growth centres in the Regional and County Plan was a political decision not based on empirical evidence or good planning, and that it was contrary to the spirit of the National Spatial Strategy to zone 14 villages for growth so we are relieved to see that this strategy is not supported in the draft RSES.

In the period of growth in the 00's Wicklow County Planning Department had some success in directing new development to the main towns of Bray Greystones Wickow and Arkow. For that they are to be commended but despite claims of strict rules one off housing and development in hamlets increased by 3.9% from 2002 – 2011 (27% of the population) and 6 small villages grew by between 30-60% in the same period even though they still had no critical mass to support modern social amenities.

In the past decade, with the hiatus in house building and refocusing of employment closer to Dublin, little has been built in the towns but the jobs ratio has deteriorated, commuting times increased and the N11/M50 more choked than ever.

Very little employment has located in the county. My Master thesis in 2005 discussed the proposition that zoning land for employment uses would do little to entice companies to locate in the county without strong urban centres which could not be created if the population was dispersed. Again the predictions proved correct and it is worrying that, whilst supporting the distribution of population to Bray and Wicklow will help, the economy proposed for Wicklow

town is based on most unlikely potential. Can Wicklow Town be a tourist hub when there are only 20 beds available in the town for people to spend the night? Can the port be developed when there is no national strategy to focus investment here? Can the third level institution in Claremont be developed in collaboration with Carlow when it is already seriously in debt with no government support anticipated?

It seems Wicklow town people will be commuting for many years to come with improved public transport a long way down the list for funding.

Similarly improvements for the extension of the LUAS are decades ahead in this draft strategy yet Fassaroe Bray is proposed for massive development on the basis of improvements to the N11/M11. How does this square with the requirement in the draft RSES that housing development be focussed around “any relocated growth being served by high capacity public transport and/or related to significant employment provision?

Fassaroe should not be included in the draft strategy without significant further funding agreed to further develop public transport facilities. If carbon emissions are included as a key indicator in the asset test in a genuine response to the climate disruption ahead Fassaroe will not meet the test and the plan will be seriously undermined.

There are many fine principles of sustainable development outlined in the draft strategy that will help non-professionals understand what a good development consists of. It is comprehensive and to be welcomed except for **the extension of who may apply for one off housing which is NOT helpful and a precise definition of economic need to be clarified in the regional plan.**

I fully support

*** The use of phased zonings but would like to see explicit support for the revision of the vacant site levy or land value tax and more diligent use of derelict sites regulations.**

but would also like to see

*** Guidelines to zone for high quality fertile land/soil in proximity to towns and villages for the local production of food.**

*** A regional plan to consider specific locations for disposing of sewage sludge from septic tanks and waste water treatment plans, for recycling of construction waste, for anaerobic digesters to deal with sewage and food waste, for solar parks and wind energy, for data storage close to energy and water supplies,**

Of particular concern is that without indicative figures offered for non designated villages and towns and with additional concessions for “an additional 20% headroom” it will be difficult for Wicklow planners to resist political pressure to draft a plan for a little bit of growth everywhere.

Council planners will need very clear guidelines for how to use the asset tests referred to and there is no clear statement similar to the 5 point asset test in the National Spatial Strategy which was a useful tool, had it been properly applied. This now needs reframing and up-dating.

Without very clear guidance on this will inevitably result in business as usual in County Wicklow who have been very adept at twisting guidelines to permit dispersed development.

I refer again to a recent development in Ashford village where An Bord Pleanala upheld the local decision to grant permission for 160 houses on a site with extremely poor pedestrian access to the village shops, no parking near the very inadequate bus service, full to bursting junior schools etc. The permission was in spite of the Inspectors strong recommendation that Ashford was not suitable for development. The Board explanation for this strange decision was that the land was zoned.

It is to be hoped that the new Planning Regulator will be given powers to prevent a reoccurrence of such a situation in the future but it is to be feared that the current draft is not sufficiently clear to overcome such an outcome.

Therefore **clear guidelines on how to conduct an asset test should include the development of outcome indicators for all objectives: specifically impact on carbon emissions.**

The use of Regulatory Impact Assessment should be applied to this draft strategy to ensure it is possible to implement the strategy without successful judicial reviews.

The development of serviced sites is a welcome proposal yet speaking to local planners there is little expectation that this will occur without government policy to fund and require this.

The use of indicators

It has been shown that a key indicator of well being is health and it is noted that the last census did collect statistics relating to our perception of our health. These should be expanded and included as an indicator of success in our National Planning Framework. Many of our health problems relate back to the opportunity for more walking and this, together with the use of public transport should be highlighted in any review of progress. Similarly access to quality food, indeed to locally grown food, will also be a key indicator of success.

I support references to the New Urban Agenda however believe that there is **insufficient attention in the draft RSES to support the type of policy required to favour localisation and sustainable food production** For example

68. We commit ourselves to supporting local provision of goods and basic services and leveraging the proximity of resources, recognizing that heavy reliance on distant sources of energy, water, food and materials can pose sustainability challenges, including vulnerability to service supply

disruptions, and that local provision can facilitate inhabitants' access to resources. (Page 19)

95. ... strengthening the role of small and intermediate cities and towns in enhancing food security and nutrition systems, ... We will also support urban agriculture and farming, as well as responsible, local and sustainable consumption and production, and social interactions, through enabling and accessible networks of local markets and commerce as an option for contributing to sustainability and food security.

123. We will promote coordination of sustainable food security and agriculture policies across urban, peri-urban and rural areas to facilitate the production, storage, transport and marketing of food to consumers in adequate and affordable ways in order to reduce food losses and prevent and reuse food waste. We will further promote the coordination of food policies with energy, water, health, transport and waste policies, maintain the genetic diversity of seeds, reduce the use of hazardous chemicals and implement other policies in urban areas to maximize efficiencies and minimize waste. (P32)

The principles of the circular economy which is espoused in the draft RSES requires that healthy food production is supported in all settlements and is not relegated to rural agricultural production areas

Similarly **the RSES fails to heed the New Urban Agenda and prioritise investment into upgrading distributed electricity grids** to manage a high number of smaller electricity producers located close to their eventual consumers, before supporting RE destined for export. Ireland's future energy management system should recognize that renewable energy is by nature distributed and that an adapted centralized system (designed for fossil) can never deliver the efficiencies, synergies and robustness of a distributed grid system.

Energy security and the circular economy requires that photovoltaic panels are integrated into all new structures in the built environment and that low impact,

low wind speed optimized wind turbines are integrated near motorways, in parks and industrial areas.

Energy, food security and the circular economy requires that distributed pyrolysis of biomass and anaerobic digestion of organic wastes for soil conditioners, agricultural nutrients and energy (heat, biogas and electricity) be appropriately integrated into settlements of all scales.

Energy security and the circular economy requires that the natural gas grid should be utilized for biogas (Methane) from pyrolysis and AD as it comes on stream and from biogas produced from the Co2 from ADs and surplus electricity from intermittent renewable Energy

Finally the number one essential is that Ireland moves RAPIDLY towards a low carbon life. By 2040 the world will be a very different place. Many things will have changed beyond recognition (as they have changed in the past 20 years).

Whilst applauding the strong principles around climate disruption in this strategy for the spatial and economic development of the Dublin and East Midland Region, we stand little or no chance of being prepared for the future ahead of us all without a strategy to **facilitate the growth of localised food supply and distributed energy.**

END

