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From: Kevin Dillon <[REDACTED]>
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Cc: Deirdre Gillane
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Attachments: Fianna Fáil submission to the Eastern & Midland Regional Assembly Regional Spatial and Economic Strategy - Draft Plan.pdf

Follow Up Flag: Follow up
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Please find attached the Fianna Fáil Submission to the Eastern & Midland Regional Assembly Regional Spatial and Economic Strategy – Draft Plan.

Please feel free to contact me with any queries.

Regards,
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Fianna Fáil

**Submission Paper to the Eastern &
Midland Regional Assembly Regional
Spatial and Economic Strategy – Draft
Plan**

**Eastern & Midland Regional Assembly
Regional Spatial and Economic
Strategy – Draft Plan**



Submission to the Eastern & Midland Regional Assembly Regional Spatial and Economic Strategy – Draft Plan

Overview

Fianna Fáil welcomes this opportunity to make a submission to the draft of the Eastern & Midland Regional Assembly Regional Spatial and Economic Strategy.

Arising from this draft plan Fianna Fáil wishes to highlight a number of issues which also draws on our submission to the National Planning Framework. These issues include:

- **Effective integration of balanced regional development**
- **Maintaining Dublin as a competitive international city**
- **Tackling the Housing Crisis**
- **Addressing severe restrictions on rural housing**
- **Ensuring sufficient All Ireland mechanisms and Brexit preparation**
- **Creating a National infrastructure Commission**
- **Strengthening transportation links**
- **Confronting climate change and ensuring a Just Transition**

We hope that these issues are fully addressed in the final draft.

Consultation

It is important that a real effort is made to reach out to every community affected by the strategy. It is also crucial that each Local Authority has the opportunity to debate the draft plan in detail.



Learning from the National Spatial Strategy

The National Spatial Strategy (NSS) 2002-2020 was the first ever national spatial planning framework in Europe following on from the European Spatial Development Perspective. The NSS was the inaugural regional planning and development framework, put in place by Fianna Fáil government in 2002.

The World Bank, IMF, EC and OECD have all been very complementary of the NSS in various reports, which was used as a blueprint by many other developed nations in drafting their own regional development plans. It was innovative as it set out high level goals for the long term physical, social and demographic development of the state.

As the draft plan recognises however and disappointingly it was ultimately undermined by a lack of joined up thinking and coherent planning at both governmental and local authority level. The extent to which the strategy was not fully embedded into national as well as local policy is now fully acknowledged.

The economic crisis compounded these fundamental problems, as did the premature abandonment of the Strategy by the 2011-2016 government. However it is misleading to suggest that implementation of the strategy was a complete failure. This needs to be objectively assessed.

The NSS led to the development of a new evidence base that has gone a long way to enhancing policy and political understanding of the dynamics of local communities, their economies and the conditions that underpin success or stagnation.

As a result of the lessons from the original NSS, there is now a clearer understanding of the trends, positive and negative, which influence social and economic characteristics on the Island of Ireland. The strategic thinking in the NSS was driven

by the objective of developing the socio-economic ‘potential’ of areas across different regions.

This was a significant conceptual innovation in the NSS, replacing more traditional methods and locally focused perspectives. We firmly believe that if spatial strategies are to help a region achieve its potential, there is a need to be cognisant and mindful of both historical identities and the reality of how people and communities function.

Undoubtedly, the scrapping of the NNS by Minister Hogan in 2012 was one of the many appalling bad choices made by that government. The decision was especially reprehensible as it was made just as the regional authorities were placed on a stronger statutory platform.

This party political decision displayed a complete disregard for the national planning process and has created a great deal of uncertainty in the regional and local planning process since.

It is vital to the future success of this Regional Spatial & Economic Strategy that the lessons of the NSS are fully learned from and implemented. Developing a comprehensive holistic approach is paramount to a NPF and subsequent lower tier plans that deliver sustainable communities, vibrant economies and attractive quality of life across Ireland.

National Infrastructure Commission

Fianna Fáil has proposed that a new National Infrastructure Commission tasked with planning ahead over a 25 year period beyond the limited 5 year cycle of current capital plans should be established. This would be set up by reforming Transport Infrastructure Ireland and drawing from the Department of Transport, National Transport Authority, Sustainable Energy Authority and Local Authorities and it should set out a new framework for the development of transport in Ireland over the



coming years. The commission should be tasked with overseeing long term plans for a series of targets.

- **Achieving 4% of GDP Infrastructure Investment**
- **Decarbonising Ireland**
- **A strong transport network that balances regional development**
- **Making Ireland an IT nation with telecommunications connectivity**
- **A secure, balanced energy mix**

In our view the work of the Commission should adhere fully to the objectives and targets set out by the NPF and share the same time frame space. This would inform the work of the RSES.

The Commission's reports should be laid before the Oireachtas and subject to scrutiny. Government departments will be required to draw up plans based on the Commission's recommendations as passed by the Oireachtas. Regional Assemblies and Local Authorities should also have a role in reviewing the reports and work of the Commission to ensure it is having a positive on the ground impact.

The NPF and this draft plan makes no reference to such an idea and refers only to the ten year national development plan. We believe this must be reviewed and changed as part of creating a new body.

Balanced Regional Development

The plan must take a balanced regional perspective on the future development of the country. This means developing economic counter weights to the increasing dominance of Dublin while ensuring Dublin remains competitive on an international scale.

Fianna Fáil's view is that, in fact, reducing regional disparities would not entail a negative impact on aggregate output in Ireland, or in high growth areas like the

Greater Dublin Area (GDA), but would have a positive impact on national growth and make overall growth more sustainable.

We believe – and this is supported by international evidence on regional growth disparities – that at Ireland’s high level of development reducing disparities in economic terms should have a positive impact on overall national economic output. This is a powerful argument and should be at the heart of what the Regional Spatial & Economic Strategy is trying to achieve.

Reducing disparities will also improve economic efficiency and productive in the GDA. Without an effective plan to foster economic growth in other regional cities and towns, the GDA will suffer lost output due to problems of congestion in housing, transport and other areas.

Congestion - in terms of slower, back-logged public transport and traffic jams, for example - is, to a certain extent, a sign that more people have jobs to get to. However, while higher levels of congestion are initially associated with faster growth, above a certain threshold, congestion starts to become a drag on economic activity.

Within Dublin, as employment increases towards the levels last experienced in 2004-2008, we will approach this threshold where traffic congestion will have a substantially negative affect on people's daily lives and on economic movement. It also has a hugely negative impact on climate change and a concentrated as well as constant investment in public transport is essential to make the NPF successful.

Physical, social and educational infrastructure should be developed in other key cities to allow them to thrive as engines of growth. Improved and more responsive local governance will also play a key part in fostering growth centres.



In this regard, Fianna Fáil has also proposed a new Directly Elected Mayor model to help provide leadership to these cities.

The roll out of Broadband is the key technological development in enabling business in rural Ireland to develop. It is also a socially critical piece of economic infrastructure to connect homes to the country's cultural and social life. This will become ever more important over the timeframe of the draft NPF. The goals of the NPF must be to ensure that the whole of Ireland benefits from future economic and demographic growth.

There is a perception that Dublin's transport needs gets priority over other cities and towns. This has impeded on growth in the past and needs to be immediately and constantly addressed.

An almost over reliance on Dublin at the expense of its adjacent counties and the rest of the island is economically, environmentally and socially unsustainable. This plan must broaden out growth to help build a regionally balance country into the future. It should also outline how it is going to absorb and implement County Development plans.

Fostering Economic Growth

The RSES must help encourage further investment in the island from both a Foreign Direct Investment perspective and facilitating the growth and development of indigenous businesses. Linking population growth and infrastructure investment combined with a renewed focus on quality of life will play a critical role in attracting and retaining businesses.

The drivers of growth identified in the economic research literature are innovation, human capital, trade, infrastructure, availability of finance and social capital. Increasingly economic growth depends on development of services and high tech



industry which in turn display a strong tendency to locate in large urban centres providing access to skills support services and appropriate infrastructure.

Therefore, the economic potential of the regions outside of the GDA will depend on their main urban centre's ability to stimulate or attract investment in such activities. This will mean the focal growth centre in each region acting as a gateway through which the region's interactions (including its flows of goods, people, money information etc.) with the other regions and directly with the outside world, are channelled.

We believe that there should be a core commitment to strengthening the links between growth centres in each region and their hinterlands, which will create a set of coherent and sustaining regions with more self-reliant integrated economies where people can find high skill employment and live.

This vision of so-called 'Balanced Polycentric' regional development – involves cities and towns in less developed regions pursuing a more self-reliant development path, rather than as primarily being residential hubs for larger employment centres, such as Dublin. Economic resilience is fostered by having a diversity and range of industrial and commercial activities in a particular area, rather than striving for specialisation.

In rural Ireland technological advances will continue to allow more diverse economic activity. Investing in adequate broadband will be critical to keeping rural communities' alive and prospering. While traditional policies aimed at encouraging regional convergence has been to provide 'hard' infrastructure as well as assistance to firms, on their own these current policies are unlikely to increase the competitiveness of lagging areas.



To develop high skill employment, in regional growth centres the focus has to be on supporting education, research and on human capital development. The role of Institutes of Technology – and potentially of Technological Universities – in having an enhanced role in their regard should not be underestimated.

We believe that a much better vision is required for IoTs as regional centres fostering high skilled and applied links with local businesses and FDI firms. These academic institutions should be valued benefits to local industries and the development to regional human capital.

It should not be the objective of government policy to remove these venerable local higher education institutions from the regions in which they are embedded. Fianna Fáil believes they should be developed and allowed to grow because of their contribution to local industry and commerce.

The RSES should be revised to expand on the role of IoTs in the target growth cities and regions.

Tourism also offers rich potential for the RSES area that should continue to be fully utilised through proper planning and supportive government policies.

Just Transition

Combined with the remit of the National Infrastructure Commission the RSES must tackle the repercussions of climate change by acknowledging the distinct regional disparities arising from policies to cut emissions. A just transition should be placed at the heart of government policy from a departmental level to spatial plans like the RSES.



The RSES should reflect the need to encompass transitioning from old declining industries in certain sectors into new job opportunities. The RSES should reflect plans to use old land banks no longer required by industry, for example Peat Lands being transformed into tourism opportunities. The RSES should integrate a government financed Just Transition Fund mechanism to support a fair and equitable shift into new industries. This fund must have regional balance as its core goal.

Addressing Climate Change

The NPF and subsequent Regional Spatial & Economic Strategy is meant to be an essential tool in Ireland's efforts to decarbonise and meet our EU and international obligations. It must be a core guiding principle of the NPF in targeting population growth, creating sustainable communities and fostering and encouraging public transport use.

Achieving critical mass in key cities and urban centres, supporting sustainable building practices and maximising the use of public transport are indispensable to that goal and fostering sustainable development in rural Ireland. Ensuring regular train and bus connections throughout the RSES are crucial.

The NPF and subsequent plans that flow from it must be focused on tackling this existential challenge.

Hierarchy of Plans

The NPF is the core statement of the government's objectives for Ireland's spatial development and it will form the top tier of the planning policy hierarchy.

The hierarchy of plans is the central pillar to uphold the entire planning process. Ensuring that the tread connecting one plan to the other is upheld and fully implemented must be subject to on-going review.



Ensuring it is effective on the ground and takes into consideration local needs and variations is the key test of any planning system. It must enjoy popular legitimacy and buy in if it is going to work.

The goals and objectives of the RSES must be clearly understandable so that the tiered plans are cohesive. The legislative powers underpinning this connection must be kept under review to uphold its effectiveness.

The Planning and Development (Amendment) Act 2018 forms part of this but must be continually revised to ensure it is working on the ground. Hierarchical planning from the European Spatial Development Perspective to Local Areas plans must be fully adhered to with sufficient local flexibility to reflect on the ground realities.

If the future RSES is to deliver on its mandate it will have to be aligned closely with other plans in particular the capital development plan as well as various regional transport planning documents, such as the Transport Strategy for the Greater Dublin Area.

The NPF and this RSES is clear on its status but will require continued vigilance and scrutiny to judge if it is actually working based on up to date information from the CSO. The Plan should be reviewed annually by the Regional Assembly working in tandem with the Office of the Planning Regulator to measure and assess its success. This can then be used to amend and re-align the plan.

Independent Planning Regulator

The new independent planning regulator must be at the heart of holding the hierarchy of plans to account. Ensuring that each layer of plans is compatible and complementary to the other is fundamental to the overall success of the system.

The regulator, working in conjunction with the Minister, must be adequately resourced to hold the hierarchy in place. The implementation of the NPF and this



RSES should be subjected to on-going parliamentary review and scrutiny including the range of powers and resources at the disposal of the Regulator.

Fianna Fáil has repeatedly requested the implementation of the Mahon recommendations on improving transparency, consistency and good decision-making throughout the planning system. It is vital that we continue to put in place the recommended legal and institutional framework.

We believe that underlying concept for the new Office of Planning Regulator to oversee and assess decision-making and process in planning authorities strikes an appropriate balance in giving the new Office independence in its role, evaluating local and regional development plans while maintaining some democratic control over the body by the Minister and the Oireachtas.

However, we have a number of concerns about the large omissions in the proposals to reform the planning system in the Planning and Development Amendment Act 2018, including many of key Mahon recommendations for improving transparency in planning such as the disclosure of political donations by planning applicants and the noting of all submissions by political representatives on planning applications.

There are also some concerns that the limitation of the OPR powers as prescribed in the Bill may make it toothless an anti-corruption watchdog in the planning process. The OPR should be able to prevent planning abuses in real time, and should be given powers to strike down particular planning decisions that it considers to be corrupt or contravening proper planning process.

One of the central functions of the new Planning Regulator will be to ensure a more consistent approach to the handling of planning applications across local authorities.



This is very important to help ensure that there is a relatively consistent approach to planning proposals taken across planning authorities. Consistency in the interpretation of development plan policies is essential if public confidence in the planning system is to be maintained.

Whole of Government Approach

A coherent planning framework has to integrate the various strands of government policy into a coherent whole. This means adapting a whole of government approach rather than a silo driven, fragmented department by department policy.

Capital Plans must adhere to the vision set out by the NPF and Regional Spatial & Economic Strategy to ensure investment is matched up with the designated areas and focus of growth. Internal Departmental plans must reflect the broader objectives laid out by the NPF. Alignment of departmental plans to the NPF and Regional Spatial & Economic Strategy is of vital importance to it delivering on the ground.

Fianna Fáil wishes to re-emphasize the importance of aligning the National Development Plan with the NPF and RSES on an on-going basis.

All Island Approach and Preparing for Brexit

Brexit further underlines the importance of developing an all Island approach to long term planning. The island is acutely exposed to the hard edge of Brexit and needs to be able to work together to mitigate its worst ramifications.

The RSES must work in tandem with the Regional Development Strategy 2035 which charts out the path forward for Northern Ireland.

Aligning with spatial plans for Northern Ireland and utilising the institutional framework established by the Good Friday Agreement and subsequent documents will be vital to fully leveraging the overall potential for the whole island.



In the context of our vulnerability to Brexit this is more important than ever. In particular joint planning initiatives in the aftermath of Brexit and cooperation should be set out. This needs to be done as a hard Brexit will have a significantly negative impact on the whole island but in particular the border counties.

Meeting Housing Demand

The importance of housing was recognised in the NSS, which reflects the fact that people require housing and so the supply and demand of housing is a key factor in determining settlement patterns.

However the strong link between housing costs, incomes and household formation was not adequately recognised. One of the core objectives of the NPF is putting in place limits on sprawl and on the dispersion of settlement patterns around large urban centres. The RSES must reflect this.

The degree to which this happens depends crucially on zoning, the incentives to develop brown field sites and other development incentives. There is a need to plan for higher apartment blocks in suburban settings and the need for both affordable and social housing both cities such as Dublin and towns.

The RSES must play a vital role in ensuring we tackle the national housing crisis.

Brown field development

National Housing Strategies should focus on brown field development. For example, the massive unused potential Above the Shop spaces – which exist in huge numbers across Cities and Towns – can be converted for use as housing. The RSES should also involve strategy for encourage more central locating of employment and commerce.

Currently the disjointed approach across government encourages the hollowing out of town centres. For example, commercial rates including the system for valuation has a role in encourage the central location of businesses.

The expected increases in population and subsequent pressure on our infrastructure will be most acutely felt in the area of housing. This will also be exacerbated by the proliferation of household formation. Where people live is one of the most basic of human needs and is an integral part of the quality of their lives.

Targeting population increases into sustainable communities on the basis of plan led as opposed to development led construction will be the single most important outcome of a successful Regional Spatial & Economic Strategy.

Balancing the need to focus growth in cities and urban centres to achieve critical mass while ensuring fresh life is breathed into rural Ireland is a major challenge for the plan to confront and address.

Meeting lifecycle requirements from students to the elderly must also be recognised in the plan. Our planning framework must be able to facilitate and people who have and rear active families. A sense of place and belonging is a positive feature of Irish life. It is important that plans work with local identity rather than been seen to impose top down solutions.

The NPF and RSES targets for existing urban footprint development should be reviewed annually in order to assess if it is being effectively pursued on the ground.

Rural Housing

The distinctive social infrastructure of rural areas is a solid attraction for families. Unlike in many urban centres the ease of access to pre-existing social networks around sporting, religious or other activities is a key asset for an area. Furthermore they play an essential part in sustaining local businesses. Helping to retain, protect



and deepen those networks must be accommodated in any overarching planning framework.

We believe the final Regional Spatial & Economic Strategy document should reflect that legal scope and the pressing social need to retain and strengthen the character of rural areas. The government should publish its new rural housing guidelines to help shape this overarching policy and give certainty to rural communities.

In addition, investment in rural water schemes is vital to putting in place a sustainable infrastructure for growth in rural villages. The final RSES should reflect the need to develop an investment plan in conjunction with Irish Water to equip rural areas for appropriate growth.

Implementation, Measurement and Monitoring

Key to the success of the Regional Spatial & Economic Strategy is an effective monitoring and implementation process. This must be founded on full democratic accountability.

A RSES implementation team and Independent Planning Regulator should publish an annual report to be laid before the Regional Assembly for review and debate. Empirical measurement and quantification of the benefits of the NPF and RSES would encourage greater levels of local buy-in and public acceptance to the national and plan.

The annual report must be based around objective, verifiable data across the key targets of the plan. Regular engagement with the relevant authorities in Northern Ireland with regard to their implementation of long term planning must also be part of the monitoring and implementation process.

The report should also issues recommendations on outstanding areas or legislative weaknesses that need to be addressed in order to help guide debate around its implementation.

The final RSES should specify these mechanisms of implementation.

Conclusion

If the Regional Spatial & Economic Strategy is to be central to achieving sustainable development across this region up to 2031 it is vital that the plan has a whole of government buy in and is fully engaged with by lower tiers of governance and citizens. It also needs to be deliverable.

Its on-going review and tweaks to ensure effective implementation on the ground is critical to its delivery. These issues should be addressed in the final draft.

