



Tuesday 26th June 2018

Dear Minister Murphy,

We are a group of Chambers of Commerce representing a business population of over 3,400 members across each of Ireland's five cities. We include: Dublin Chamber, Cork Chamber, Limerick Chamber, Galway Chamber and Waterford Chamber.

We are writing to you in relation to two specific issues that we believe require your attention. These are: the voting process for Metropolitan Area Strategic Plans (MASPs); and the poor representation of city regions within Regional Assemblies.

We urge you, at a minimum, to ensure that only members appointed from an area – such as the metropolitan areas of each of the five cities – vote on a regional plan for that specific area. In addition, we propose that you increase the number of elected representatives from the five city regions to better reflect their populations, and their roles as drivers of regional growth as outlined in the National Planning Framework. Finally, it should be noted that we do not wish to see the overall city region representation changed without the necessary changes to the voting processes for the MASPs. We outline these proposals in greater detail below.

For the National Planning Framework to achieve its ambitions, it must be underpinned by robust economic and industrial strategies at regional level. This job has been given to the three new elected Regional Assemblies. Created in 2014, these bodies now have extensive powers under the Government's National Planning Framework and National Development Plan 2018-2027. Essentially they are tasked with putting the 'meat on the bones' of the NPF, through the Regional Spatial and Economic Strategies (RSESs) yet to be published. The MASPs will be sub-regional plans for the functional area of each of the five cities.

We are concerned about the under-representation of the residents of metropolitan areas in the Regional Assemblies. There is a democratic deficit in the regional assemblies as currently constituted, and city residents and their interests are seriously under-represented, while those of more rural areas are over-represented.

In addition, we believe that without a strong executive and political voice for the Metropolitan Regions, to coordinate the making and implementation of the MASP for the cities, the strategic plans will not be effective. As the MASPs will determine the development of Ireland's cities in the years ahead, it is essential that the decision-making structures are properly configured from the outset. We have serious concerns about proposals for how the MASPs will be drafted and decided upon. As we understand, it is currently proposed to draft the plans with input from all elected members on the relevant Regional Assembly as well as with input from all local authority stakeholders.

This means that elected members and officials from outside of the affected area will have a majority and will be able to determine the content of the MASP, despite the fact that their constituents will not be directly impacted by the plan. Since the Regional Assemblies do not have a majority of urban councillors, this proposal means that members from other parts of a region could potentially impose a Metropolitan Area Strategic Plan without the consent of representatives from the metropolitan

area concerned. Metropolitan Area Strategic Plans, that will set the parameters for important developments within their areas, will not be decided upon solely by representatives from the affected area. This is not only inimical to the principles of democratic decision-making, but also of economic efficiency and good planning.

These issues could be addressed through two amendments to the Planning and Development (Amendment) Bill 2016. Alternatively, they can be addressed via secondary legislation such as by amendment to the Local Government Establishment Order 2014. These amendments would not in any way negatively impact other counties, but would allow the proposed Metropolitan Area Strategic Plans for the five cities to be more effective and make Regional Assembly representation fairer and more proportionate for citizens living in all parts of each region.

We want to thank you for taking these issues into consideration and we would welcome the opportunity to discuss the matter with you further at your convenience.

Yours Sincerely,



Conor Healy, CEO, Cork Chamber of Commerce



Gerard Hurley, CEO, Waterford Chamber of Commerce



Mary Rose Burke, CEO, Dublin Chamber of Commerce



Dr James Ring, Limerick Chamber of Commerce



Dave Hickey, President, Galway Chamber of Commerce

Further Information:

This Amendment proposes that only members appointed from an area – such as the Greater Dublin Area – should vote on a regional plan for that area.

Amendment to Planning and Development Act 2000 or Alternatively Amendment to Ministerial Order

“The Principal Act (Planning and Development Act 2000) is amended by inserting the following subsection after section 21 (3) (b)

“(c) In the case of a regional spatial and economic strategy for one or more parts of a region pursuant to a direction under paragraph (a), only members of a county council or city and county council elected in accordance with this Act for the local electoral areas situated in a planning authority covered by the strategy, collectively comprise the assembly membership for that area for the purpose of the performance of reserved functions and collectively shall be known as ‘area strategic plan members’

(d) In the case of a regional spatial and economic strategy for one or more parts of a region, the plan shall be considered only by the area strategic plan members elected from planning authorities covered by the strategy and be adopted by resolution, with or without amendment, within such time limit and in accordance with such conditions and requirements, as may be so prescribed.

Appendix 2: Proposed Reform to Method of Appointment in Regional Assemblies

We believe the following changes should be made in the Establishment Order to introduce greater fairness and proportionality into method of appointments to regional assemblies.

Amendment of LOCAL GOVERNMENT ACT 1991 (REGIONAL ASSEMBLIES) (ESTABLISHMENT) ORDER 2014

“Amendment of section 43 of the Act of 1990 (Local Government Act 1990 [as Amended by section 62 of the Local Government Reform Act 2014]) is amended by the insertion of the following subsection after Section 4(c) (ii)

“(d) Any establishment order or an order amending an establishment order shall take into account the following criteria when specifying the number of members of each regional assembly to be appointed by each constituent local authority, and in particular shall ensure that:

(i) the number of persons to be appointed to be members of a regional assembly by a constituent local authority shall, as far as practicable, be proportionate to the number of residents in each constituent local authority area,

(ii) subject to a minimum total of 2 members per local authority there should be one member for every 55,000 population resident in each constituent local authority area

(iii) in as far as practicable, the ratio of residents to representatives of each local authority area should be no less than 10% above the average ratio of residents to members represented on each respective regional assembly

(v) a review of the number of members appointed from each local authority to each regional assembly shall occur after each local authority election, based on the previous census” “

Appendix 3: Table of City Region representation in Regional Assemblies

The following tables show the difference between the current ratio of representatives to residents for each local authority.

NWRA

Local Authorities	Current Number Reps	Residents per Rep (current)
Cavan	2	38,088
COR-NWRA	4	-
Donegal	3	53,064
Galway City	2	39,334
Galway County	3	59,797
Leitrim	2	16,022
Mayo	3	43,502
Monaghan	2	30,693
Roscommon	2	32,272
Sligo	2	32,768
Total	25	33,897.68

EMRA

Local Authorities	Current Number Reps	Residents per Rep (current)
COR	2	
Dublin	16	84,210
Kildare	3	74,168
Laois	2	42,349
Longford	2	20,437
Louth	2	64,442
Meath	3	65,015
Offaly	2	38,981
Westmeath	2	44,385
Wicklow	3	47,475
Total	37	44

SWRA

Local Authorities	Current Number Reps	Residents per Rep (current)
Carlow	2	28,466
Clare	2	59,409
Cork City	2	62,829
Cork County	5	83,442
Kerry	3	49,236
Kilkenny	2	49,616
Limerick City and County	3	64,966
Tipperary	3	53,184
Waterford City and County	2	58,088
Wexford	3	49,907
Grand Total	27	58,737