

**Sent:** 04 November 2017 12:41  
**To:** National Planning Framework  
**Subject:** Submission - draft National Planning Framework

Name: Conor Blennerhassett

[REDACTED]

Representing: Submitting in a personal capacity only

Text of Submission:

Dear Sir / Madam

Following my review of the draft National Planning Framework (NPF) document, I am particularly disappointed to note the absence of any clear emphasis (beyond vague and unsubstantiated objectives) on the importance of minimising low density sprawl and maximising investment in major viable public transport projects.

I submit that the NPF should impose a requirement (by whatever mechanism necessary) that all planning decisions (from local authority to ABP level and including mechanisms such as strategic infrastructure development decisions and Railway Orders) shall consider as a priority whether a development has addressed the following mandatory criterion:

"Whether the density of the development is appropriate for its location in light of the availability and capacity of public transport services (either currently available or expected to be delivered within a reasonable time following completion of the development) connecting the development with the nearest major commercial centre. By way of illustration, where relatively high capacity and high frequency public transport services are available to a given development, the density of that development should be commensurately high. "

The above criterion would mitigate against the historic and continuing practice of the granting of permission for low density development (e.g., sprawling housing estates) in locations beside high quality roads and railways which have the capacity to cater to far higher population densities. High density development provides significantly more patronage to local public transport services, encouraging a virtuous cycle of high public transport patronage, higher public asset investment / returns, lower commuting times, lower environmental damage and higher quality of life.

The question of whether or not public transport investment gives a good return to the taxpayer is founded upon cause and effect: an integrated planning and transport policy will render Ireland's under-utilised and under-funded railway infrastructure, for example, viable for investment by creating demand. Conversely, low density investment creates sprawl which can only be viably served by significant investment in large scale roadbuilding, which the NPF itself acknowledges as an unsustainable proposition (despite the NPF's disproportionate and inappropriate emphasis on large road projects).

Yours faithfully

Conor Blennerhassett  
(Submitting in a personal capacity only)