

Submission on draft NPF 2040

Cllr Steven Matthews

Wicklow Co Co

I welcome the opportunity to make a submission of my observations on the draft NPF 2040. It is acknowledged that any national plan or policy that seeks to rectify planning issues that negatively impact on our economy, our communities and our environment will create the perception of winners and losers. The over arching objective of this policy should be to create a framework for sustainable growth, proper planning and all in the interest of the common good. I would urge that any amendments made to this draft will be assessed in these terms and be subject to climate impact assessment. Ireland needs to continue to compete on a global stage whilst creating and maintaining sustainable, liveable villages, towns and cities. Decisions need to be made that curtails urban sprawl, rural decline, unsustainable rural housing policy, car dependency, increasing GHG emissions from agriculture, transport and energy production.

It has been suggested that a 5 week window for submissions is insufficient, however I disagree as this time period is similar to most county development plan stages for submissions.

I wish to submit the following observations;

1. It is imperative that this document shall have a full statutory and legislative backing.  
Reason: the NSS was undermined and failed due to a lack of statutory basis
2. The proposed office of planning regulator should be completely independent of the Minister and political influence. Ministerial orders which are not implemented and where CE recommendations on CDP or LAP are not implemented, they should be referred to the OPR  
Reason: Political interference in our planning system in the past has undermined the principles of proper planning and has led to corruption. Elected representatives may be unduly influenced by lobbying when making planning policy decisions and any refusal of a CE recommendation should require a robust and reasoned defence for failing to comply with the planning department/CE recommendations
3. Consideration should be given to Municipal Districts boundaries and administrative areas of local authorities being realigned with the Metropolitan Area Strategic plans
4. P14 3<sup>rd</sup> paragraph insert words 'the most important' between 'Climate change .....facing the world'
5. It is unrealistic to expect such high levels of growth in Cork, Limerick, Galway and Waterford and to slow growth in the GDA area. Dublin needs to compete on a world stage and requires significant additional infrastructure investment to succeed in that space. It is acknowledged that the NPF is not an infrastructure delivery document however, it should state that the following transport projects shall proceed in order to sustain future sustainable growth;  
DART Underground and extension from Clongriffin to Airport  
Rail electrification to Balbriggan and Maynooth  
Completion of Navan rail line

It should also state that trebling of current investment in cycling and pedestrian infrastructure will provide the required alternative to car dependency in cities and large towns

The Bus Connects strategy needs to be implemented

6. P41 National Policy Objective No.4 Insert the words 'affordable, walkable, cycleable,' between 'attractive' and 'liveable'
7. The area of site which qualify for the vacant site levy should be significantly reduced to reflect the large number of suitable vacant sites throughout our towns and cities which are developable but no means currently exists to incentivise or penalise such site owners to proceed with development (a legislative change required but this change should be an objective of the NFP)
8. The objective to reduce the need for resident car parking in urban centres must be supported by improvements in walking and cycling infrastructure and facilities. This objective must also have support from the public agencies that manage and enforce parking
9. There needs to be greater investment in public transport/cycling/walking and less in private vehicle based road transport
10. Proposed land zonings which pass the flood risk justification test (for rivers and lakes) should include an objective for upstream soft engineering flood mitigation to attenuate flows during flood events. These works could be partially financed by special DCS attached to development permissions. This could be included in National Policy Objective No 58
11. Every LAP should provide a pedestrian permeability plan with the objectives of increasing linkage and connectivity through residential areas to town centres, transport nodes and especially safe walking routes to school
12. The NDP should provide a national map of 'appropriate locations' for renewable energy locations as referred to in National Policy Objective No 57
13. CDP should be permitted to include higher than national building standard requirements for energy efficiency such as 'passive house' or similar
14. Amend National Policy Objective No 59 by replacing 'Promote' with 'Require'
15. LAPs should be adopted by the Municipal District elected members. (Requires legislative change but should be included as a new National Policy Objective between 65 and 66)
16. In relation to National Policy Objective 67, where the NTA require a transport study and plan to be produced with regards to a proposed zoning, a zoning may proceed to allow completion of a CDP/LAP but no development should proceed until the transport plan is implemented or proceeds in tandem with development
17. P139 Waste. The NPF could clarify what is 'technically feasible' in relation the district heating networks