

10 November 2017  
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Dear NPF Submissions Team,

## **DRAFT OF IRELAND 2040 – OUR PLAN**

Having read the Draft of Ireland 2040 – Our Plan, Turley would like to make the following comments:

- With respect to the '*presumption in favour of development that encourages more people, jobs and activity within existing urban areas*', we are concerned that this could lead to the creation of a presumption against proposals that cannot be located within existing urban areas, but which have unique merits and benefits which would, on balance, mean that would be considered to be 'sustainable development'. Indeed, the English National Planning Policy Framework sets out a 'presumption in favour of sustainable development' which is a pragmatic approach to development, and perhaps the NPF should consider including this in place of their current presumption in favour, or think about a hybrid presumption.
- We would also ask that the emphasis on a compact growth model which promotes infill development accepts the inherent difficulties associated with developing brownfield land, such as viability issues. It would be pragmatic to set out an acceptance that flexibility will also be needed particularly for developments that cannot be located within existing urban areas.
- We welcome the inclusion of National Policy Objectives 46 and 47 and the inclusion of upgraded access to the North-West border area with specific reference to the N2/N14/A5. However, we would ask if there could be the NPF could include an indication as to how and when the future impacts of Brexit would be addressed in future iterations of the NP, as mentioned on page 99, given that they could have significant impacts for border areas, particularly the North West City Region.
- We welcome the desire to regenerate of rural Ireland, and we hope that this will encourage further diversification of the rural economy so as to benefit those living and working in these areas. However, we would suggest that when referring to sustainable growth patterns, specific reference should not be made to environmental gains without also giving mention to social and economic

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gains. As there are three dimensions to 'sustainable development', these being economic, social and environmental, ask would ask that the NPF sets out the importance of achieving gains in all three dimensions because they are mutually dependent.

Yours sincerely

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**Senior Planner**

