From:	John Clancy
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То:	National Planning Framework
Subject:	Ireland 2040 Our Plan
Follow Up Flag:	Follow up
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## Dear Sir/Madam

I wish to make a submission on the above.

- The Population and Home provision does not tally using euro stat data the population increase should be 1.2 million (2.4 persons per house hold EU average).
- Leaving this anomaly aside the population projection does not factor an increased net inward migration. The decline of the Occidental world's political and economic power, coupled with increasing global instability and climate change will be catalysts for greater inward migration therefore the requirement for greater provision for accommodation and infrastructure. If this is not planned for our country, it will become very unstable and politically volatile .
- If we provide 500,000 homes at the present density as Dublin the land requirement will be 343sq. km. of land (2011 census Dublin density 3498 persons per sq. km.) This land requirement equates to 40 per cent of the area of Co. Louth. If houses are provided at the density of Cork /Limerick/Galway/Waterford (2011 census figure 1311 persons per sq km.) the land requirement will be 915 sq. km. Put another way, the entire area of Co. Louth. All these densities are totally unsustainable and are leading to the high cost of living in Ireland and high cost of maintenance of transport and general infrastructure .
- The minimum density for sustainable settlements is 13,500 persons per sq. km. The preferable density is 22,000 per sq km. With that density you can get the transport modal split 70% public transport, 12% car, the rest by foot or bike ( euro stat figures of cities with that density). One is fully aware that this cannot be achieved overnight, but the start must be made now. The min density figure of 13,500 persons could be accommodated in four- storey large apartment type accommodation with a ratio of public/private open space of 58% and building footprint of 42% with a density factor of 1.3.
- Apartment/home min. sizes must increase. Average size is 76 sq meters in the UK while Holland is 115sq meters. All over Europe sizes of homes are increasing. This must be factored in.
- All new developments must be street-centered as opposed to road-centered (suburbia). The 'Siloised' approach of planners must now stop and the planning mix of functions must be encouraged. Higher density allows for this kind of sustainable interface.
- From the maps enclosed in the executive summary the Central cores of our cities are losing population at an alarming rate. Through generous tax breaks the building of apartment homes must be encouraged, a special authority for inner city development (not unlike the Customs House Docks Authority) could be a way. This could be charged with the task of rebuilding and increasing our inner city housing stock at a mandated density of 22000 persons per sq km with the rich mix of functions included.
- The rural housing issue: provision of new homes must be cut to homes within families that make their living from the land.
- Property tax on houses in the country would have to be higher to pay for the increased costs of providing services.
- Major investment should be made in the rail to provide fast interconnection between all the terminal stations and Dublin max journey time should be two hours. Thus the town/ cities are given a clear chance to compete with the **East and Dublin**.
- Investment in water supply and sewage treatment has to be a priority. Dublin supply from the Shannon

must be complete by 2025 in order to facilitate development.

Question - have studies been done to access the impact of rising sea levels on our communities that live close to the coast and river basins, and consequent additional homes required arising from inundation? 60% of our population live with in 10 kms. of the coast.

That concludes my submission. May I add that it is good for once that the Government is beginning to look at the long view.

Regards JP Clancy FRIAI ( Chief Architect and Designer CIE 1981-2008)