

NPF Submissions,
Forward Planning Section,
Department of Housing,
Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0.

30th October 2017

REF: Submission for National Planning Framework.

Dear Sir/Madam,

This is a cover letter to confirm my name and address as attachment to the submission for National Planning Framework hereby enclosed on behalf of the Kilcloon Environmental Action Association.

Address: Kilcloon Environmental Action Association,
c/o Ciarán Burke (Secretary)
Moygaddy,
Maynooth P.O.,
Co. Meath,
W23 N9X8.

Email: kilclooneaa@gmail.com

Yours Sincerely,

A solid black rectangular box used to redact the signature of the sender.

Secretary

The following is the Submission in relation to the draft National Planning Framework on behalf of Kilcloon Environmental Action Association - Public Consultation - Closing Date 10th. November 2017

Kilcloon is a small rural community in County Meath close to the border with Kildare.

The local community have worked with the Planning Authority, Meath County Council in recent years in having a rural water supply installed and recognise the completion of a sewerage scheme that serves part of the local area. The Kilcloon Environmental Action Association supports appropriate levels of development within the Kilcloon area, consistent with the existing character of the area and the needs of the local community and the environment.

The Kilcloon Environmental Action Association, established by the local community, therefore, welcomes the National Planning Framework (NPF) and, in particular, the commitment that the policies contained therein will be enforced through statutory means. We have previously made a submission on the earlier stages of the NPF in response to a series of questions raised as to the issues involved (March 2017)

In particular we welcome the policies and statements within the NPF as set out in the Appendix to this submission.

As stated previously, we support appropriate development of our rural area. We, therefore, welcome and support the policies and approach as set out in Section 4.1 of the NPF "Strengthening Ireland's Rural Fabric" including

- Enhancing our unique rural settings and the communities who live there.
- Planning for the future growth and development of rural areas, including addressing decline, with a special focus on activating the potential for the renewal and development of small towns and villages.

However, the community have become concerned in recent years at decisions by the Planning Authority in relation to a large area of land within County Meath running along the Meath / Kildare Border approximately 3 km from Maynooth.

Meath County Council, through a series of Variations to their Development Plan have zoned over 350 acres of these rural and unserviced lands for industrial / commercial and housing development.

These lands, at Moygaddy, Kilcloon, are described within the current Meath County Development Plan as "Maynooth Environs" despite their current rural character and distance from the town of Maynooth.

The lands are also contiguous with a Special Area of Conservation / Natura site which is the Rye Water, which forms the border between Counties Meath and Kildare.

The zoning of these lands is not in accordance with the current Regional Planning Guidelines for the Greater Dublin Region, the National Spatial Strategy and other National Planning and Transport

Planning policies. Despite raising these issues with the Planning Authority and with Government, the Kilcloon Community has failed to have any impact on these developer led zoning decisions.

We, therefore, welcome and support the policy set out under Section 5.7 of the NPF which states that *"Development sprawl at every settlement level in Ireland has manifested as scattered development, 'leapfrogging', continuous suburbs and linear patterns of strip or ribbon development. This type of development has made it costly and often unfeasible for the state to align and invest in infrastructure delivery where it cannot be justified and compounds issues such as congestion and pollution, increased commuting times and has had an overall negative impact on people's health and well being"*

Meath County Council is currently preparing a new County Development Plan 2019 to 2025. In an earlier public consultation on the "Issues Paper" which sets out the general approach of the Planning Authority, the previously zoned and still undeveloped area of rural land at Moygaddy is identified by Meath County Council as a "Large Growth Town II".

This is despite the definition of such a designation in the Dublin Area Regional Planning Guidelines (RPG) 2010-2022 as "strong active growth towns, economically vibrant with high quality transport links to larger towns / city".


The Kilcloon Environmental Action Association has already made a submission in relation to the Meath County Council Issues Paper. However, all the indications are that the Planning Authority intends to persist with their above referenced proposals in their Draft County Development Plan.

The Kilcloon Environmental Action Association respectfully requests that the Minister for Housing, Community, Planning and Local Government instructs Meath County Council to put the new draft Meath County Development Plan 2019 to 2025 - which has not yet been published - on hold until the adoption of the National Planning Framework and further requests that the new Meath County Development Plan 2019 to 2025 be revised to bring it into line with the policies set out in the NPF, in particular those policies set out in the Appendix to this submission (many of which were also set out in the previous National Spatial Strategy but were ignored by Meath County Council).

If we are to believe what is stated in the NPF Section 1.3 "How the NPF will be different" then it is essential that Planning Authorities are instructed to avoid implementing any new County Development Plans until the proposed statutory Regional Spatial and Economic Strategies (RSEs) are in place as set out in the NPF. Any moves by Planning Authorities to introduce "facts on the ground" in advance of the NPF will only serve to undermine the credibility of this important Planning Policy before it is established.

This sequencing and hierarchy of Planning is essential to the implementation of the policy in Section 3.1 of the NPF that "local authority development plans which address further detailed local matters, such as the zoning of land, must be in accordance with the RSEs".

Submitted on behalf of the Kilcloon Environmental Action Association by

 Secretary, 30th. October 2017

APPENDIX

Relevant Extracts from the draft National Planning Framework

There will be a major new policy emphasis on renewing and developing existing built-up areas rather than continual expansion and sprawl of cities and towns out into the countryside, with a target of at least 40% of new housing to be delivered within the existing built-up areas of cities, towns and villages on infill and/or brownfield sites. (Page 8)

Ireland 2040 will be given full legislative support within the planning system, including regular review and update, reflecting changing circumstances and in line with city and county development plan review cycles. It introduces more streamlined approaches to zoning land for development in line with infrastructure provision. (Page 9)

Section 1.3 How the National Planning Framework (NPF) will be different

Unlike the National Spatial Strategy (NSS), the objectives of the NPF will be applied on a regional basis through statutory Regional Spatial and Economic Strategies (RSEs). These are new plans that will address more detail at a regional scale, being prepared by each of the three Regional Assemblies that were established in 2014. The RSEs must accord with the National Planning Framework and in turn, local authority development plans which address further detailed local matters, such as the zoning of land, must be in accordance with the RSEs.

National Policy Objective 3a - Deliver at least 40% of all new homes nationally, within the built-up envelope of existing urban settlements

Section 4.1 Strengthening Ireland's Rural Fabric

- Enhancing our unique rural settings and the communities who live there.
- Planning for the future growth and development of rural areas, including addressing decline, with a special focus on activating the potential for the renewal and development of small towns and villages.

Section 5. 7 Housing

Location of Homes Housing location policies will prioritise locations where people have the best opportunities to access a high standard quality of life. Housing in Ireland has often taken on a dispersed and fragmented character which has led to people living further away from their jobs and often being at a sizeable remove from important services such as education and healthcare. Development sprawl at every settlement level in Ireland has manifested as scattered development, 'leapfrogging', continuous suburbs and linear patterns of strip or ribbon development. This type of development has made it costly and often unfeasible for the state to align and invest in infrastructure delivery where it cannot be justified and compounds issues such as congestion and pollution, increased commuting times and has had an overall negative impact on people's health and well-being.

National Policy Objective 34 Prioritise the provision of new homes at sustainable locations and at an appropriate scale relative to location

National Policy Objective 37 Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration and increased building heights.

National Policy Objective 54 That the planning system is responsive to our national environmental challenges and ensures that development occurs within environmental limits having regard to the requirements of all relevant environmental legislation and promotes the sustainable management of our natural capital.

Page 125 Implementation

Enhancing Leadership and the Strategic Approach to Local Planning Realising the ambitious growth strategy for different parts of our country and cities and towns in particular will require new approaches in relation to (1) Metropolitan Area Planning, (2) planning and development of other large urban areas and (3) reforming the land management and land use zoning and development prioritisation processes.

National Policy Objective 65 City/county development plan core strategies shall comprehensively identify, co-ordinate and balance targeted population and housing growth in cities, large and small towns, rural settlements and in the open countryside for the relevant planning authority area and this will be supported by a standardised methodology for the preparation of core strategies.

National Policy Objective 67 Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is available for development, ii) zoned land that requires further specified investment in basic infrastructural services for development to be realised and iii) zoned land unlikely to be serviced within the life of the relevant plan. When considering zoning land for development purposes that requires further investment in basic infrastructural services, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and identify the responsible delivery agency(ies); When considering zoning land for development purposes that is unlikely to be serviced within the life of the relevant plan, planning authorities will review the status of such lands.