

## Submission to the National Planning Framework

I wish to make the following submission in relation to the draft National Planning Framework document, *Ireland 2040 – Our Plan*.

I would like to highlight what seems to me to be an extraordinary lacuna in the framework of the draft plan. The draft proposes to divide urban settlements into four categories: the capital city, Dublin; four further cities, Cork, Limerick, Galway, and Waterford; large towns with a population greater than 10,000; and small towns with a population less than 10,000.

The smallest of the four cities, Waterford, has a population of approximately 54,000.

10,000 to 50,000 seems to be an overly broad category that will fail to identify and meet the needs of the diversity of urban settlements within that range. It should be obvious that a town with a population of 25,000 to 50,000 will have many opportunities and challenges that differ from those for a town of just over 10,000.

Data from the 2016 Census indicates that there are seven towns with populations in the 25,000 – 50,000 range. Only one of these (Swords) is within the greater Dublin sprawl. A further ten towns have populations in excess of 20,000.

These larger towns should, for example, be able to accommodate a greater proportion of future development on infill / brownfield sites within the built envelope of the existing urban areas. The target for these towns should be closer to 50% than the proposed 30%.

More targeted planning for the needs of these larger towns by placing them in a separate category (or two) would significantly contribute to the achievement of the following key objectives of the plan:

- Enable people to live closer to where they work, moving away from the current unsustainable trends of increased commuting;
- Secure more compact forms of urban development in all types of settlements.
- Plan for and implement a better distribution of regional growth, in terms of jobs and prosperity;
- Transform settlements of all sizes through imaginative urban regeneration and bring life / jobs back into cities, towns and villages;

In addition to the above observations, and as an example of how more targeted treatment of larger towns (>25,000) would be conducive to the overall objectives of the Plan, I wish to endorse the submissions made by the Drogheda City Status Group.

Patrick Carr,

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