

**From:** Gerard Frisby <gerardfrisby@eircom.net>  
**Sent:** 08 November 2017 19:59  
**To:** National Planning Framework  
**Subject:** Submission of Cllr Ger Frisby Piltown MD under NPF 2040.

Dear Minister,

I hereby make the attached submission on my own behalf as an Elected Public Representative for the Piltown Municipal District County Kilkenny under the NPF Framework Document. I wish to stress that I do not consider the public consultation period for this phase of the NPF process was sufficient to allow full consideration of the policy objectives put forward and the issues raised. I would request that a further period of public consultation be provided to allow for review and comment on the final draft of the plan before it is signed into law.

My submission focuses upon the proposals in the Framework Document in relation to the metropolitan area strategic plans (MASPs) for the 5 main metropolitan areas in the state. National Policy Objective 63, provides that the MASPs will be prepared by the 'appropriate authorities' in tandem with and as part of the relevant Regional Spatial and Economic Strategies. My concerns in connection with these proposals are :

1. There is not enough clarity provided in the NPF Document on the MASPs and their role in the development of City Regions.
2. The 'appropriate authority' referred to in national policy objective 63 needs to be elaborated on. Clarity is required on the governance structure for the metropolitan area and on the role the elected members, the Department and the Regional Assembly will have in the decision making and governance processes that will affect all the people in the area.
3. I am concerned that as the intention is for the MASPs to be part of the Regional Spatial and Economic Strategies, proposals outlined in the MASPs may not therefore require approval of the Oireachtas. It is critical that this issue is clarified for the people that I represent in South Kilkenny and the people of Kilkenny as a whole.
4. A City region is more than those who commute into it for work as defined by the EU in the NPF Document. I therefore stress on you to clarify the governance structure for the MASPs and ensure that this structure includes representatives from all sides of the metropolitan area so that all people of the region have an input into the future direction and growth of the region.

As a local representative who was born and reared and lives in Slieverue( which was one of the areas under review of the recent Boundary Commission which caused a lot of division and hurt to my local community and of course wasted a lot of public time and money in the process) I feel very strongly that the decision of the Boundary Committee not to change the County Boundary was the right one and therefore the governance structure of the said area should reflect this in a joint and joined up approach underpinned by the proper legislative framework so that the Area and Region as a whole can grow in accordance with the aims of the NPF vision.

Cllr Ger Frisby  
Piltown Municipal District  
Kilkenny County Council