



NPF Submissions
Forward Planning Section
Department of Housing, Planning and Local Government
Custom House
Dublin 1 D01 W6X0

9th November 2017

RE: National Planning Framework (NPF)

Dear Minister,

I hereby make the attached submission on behalf of the elected members of Municipal District (MD) of Piltown under the NPF Framework Document. This submission is in addition to the submission made by Kilkenny County Council. I wish to stress first of all that we 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. In this regard, we respectfully request that a further period of public consultation therefore be provided to allow for review and comment on the final draft of the Plan before it is signed into law. We firmly believe this is merited, especially given the critical importance attaching to the Plan and its implications for the citizens of the state over the next 20 years.

This 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. The MASPs are to be given statutory underpinning and will address high-level and long-term strategic development issues. 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. The members of the MD of Piltown make the following comments in connection with these proposals:

- there is not sufficient clarity provided in the NPF Document on the Metropolitan Area Strategic Plans and their role in the development of City Regions;
- the “appropriate authorities” referred to in national policy objective 63 need to be elaborated. While as a minimum we consider that the relevant local authorities would have a central role in the preparation and adoption of the MASPs, clarity is needed on whether or not the intention is to include wider interests in the decision-making and/or governance process, such as educational institutes, industry representatives, state agencies, etc? Furthermore, further clarity is required on the governance structure and accountability and reporting arrangements of same at local, regional and national level, including with the elected members and the role of the Department and the Regional Assembly;



- the process for the preparation and approval of the MASPs needs to be detailed, including timelines for completion/adoption;
- we are concerned that as the intention is for the MASPs to be part of the Regional Spatial and Economic Strategies (which in turn are to be underpinned by legislation), proposals outlined in the MASPs (e.g. in relation to governance of the metropolitan areas) may not therefore require approval of the Oireachtas. It is critical that this issue is clarified for the people of Kilkenny in general and in particular the people of South Kilkenny;
- a City region is more than those who commute into it for work (EU definition of city used in NPF). City regions should be defined by the functional inter-relationship with their surrounding areas including achieving critical mass, land use and transportation planning, employment, connectivity and access to educational and health services, green infrastructure, cultural and retail services etc. Furthermore, public transport connectivity between the large towns within the South East and Waterford City should be an issue for the MASPs. The area of the MASPs should therefore extend wide enough to capture this influence.

Fidelis Doherty

Fidelis Doherty
Cathaoirleach
Municipal District of Piltown