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Sent: 10 November 2017 11:31
To: National Planning Framework
Subject: Submission to the draft National Planning Framework from Cllr. Andrew Montague

Here's my input into the draft National Planning Framework:

A major objective of the framework should be to move towards a low carbon society. I don't think enough emphasis was placed on this throughout the document. A major problem with the framework is that it proposes to improve transport in Ireland by expanding our motorway network, so there will still be ever increasing reliance on the private car. Even if we move to an all electric fleet, this increased reliance on the car will lead to significant carbon emissions, as significant amounts of fossil fuels are used to build cars, and there will also be emissions generated in producing the electricity that these vehicles need, so an electric fleet is far from being a carbon free solution. Furthermore, even if electric cars generated zero emissions over their life times, by encouraging more people to drive, we will end up with significant congestion in our cities. The only sustainable way to deal with transport is to encourage the use of public transport, walking and cycling. We need to improve the public transport, walking and cycling facilities within our towns and cities, and we need to improve public transport between our towns and cities. Recent experience shows that our roads are being built to a standard way above local requirements, which is wasteful of scarce resources, and will encourage higher levels of car commuting for years to come.

There needs to be more emphasis on cycling as a major mode of transport in our cities. In Dublin more people commute on bike than an Irish Rail, the Dart and the LUAS combined. We are prepared to spend billions on improving our rail services, but we are reluctant to spend a few million on our cycling facilities. The UK's Department of Transport shows that the return on investment into cycling projects is far higher than any other mode of transport. The planning framework should set out an ambition to have high quality cycle networks in all our towns and cities, and also a high quality inter city cycling network.

A more positive objective of the document is to change the trends of recent decades by encouraging more residential development within the existing footprint of our towns and cities. The document is light, however, on details on how this will happen. It is almost always cheaper and faster to develop in greenfield sites outside towns than in town or city centres. To get the right ratio of development, we need to either make it cheaper and easier to develop in our town and city centres, or we have to prevent development outside of our towns. If we prevent development outside our towns, but it remains too expensive to build inside our towns, we could get little or no development anywhere, which would make our housing crisis even worse. The planning framework must set out steps that will reduce the cost and difficulties of developing within our towns and cities. For example, local authorities could get new CPO powers and enough funding to assemble sites in critical locations.

Our built heritage is vital to the future of our towns and cities and give a unique identity to our architecture that both locals and visitors cherish. If we are to encourage more development within our towns and cities we have to make better use of our built heritage. It can't be left neglected, it must be used. We will have to allow flexibility in the use of these assets if they are to remain in use and to remain in good condition.

There is a lot of emphasis in the document on residential development, but there is little about the quality of development, and what makes a good community to live in. From Jane Jacobs onwards, planners have recognised that mixed-use development is an important factor in developing quality places. This should be emphasised in our planning framework. Our towns, urban villages and city centres should strive to combine residential, retail/commercial and office space together. These different uses are complimentary to each other and necessary to create good environments in which to live and work. Many of our industrial estates have large quantities of low density, car-based, poor quality office and commercial development. We should discourage this form of development from our industrial estates and

encourage commercial and office into our town and city centres. Industrial estates should be reserved for industry that is not suitable in residential areas, such as noisy or polluting industries. Many existing industrial estates could be redeveloped for mixed-use development.

I strongly support the statement that there should be no car parking requirements in the city centres, and there should be greatly reduced car-parking requirements in the suburbs. These parking restrictions should equally apply to commercial and industrial development as well as residential development. This statement should be strengthened to prevent different local authority areas competing for business by offering more car parking to business than neighbouring counties. For example Fingal offers five times more car parking space for commercial development than Dublin City Council. This leads to inappropriate development such as the Gullivers Real Estate, in Northwood in Santry, where a massive windswept car park is never more than about 10% in use.

One way to encourage high quality and high density living is to follow the example of Vauban, in Freiburg in Germany. In this new suburb, there is no on-street car parking, but a number of community garages are provided. Cars are allowed to drive through the community at slow speeds, and people can park to unload cars, but no car parking is allowed on the streets. This provides a very family friendly environment, and would be a good template for residential development in Ireland.

Permeability is vital for high quality urban environments. When new residential schemes are being developed, it can be difficult to get the backing of existing communities to allow the beneficial permeability. Local councillors will be under serious political pressure to block permeability, and we get repeated phases of development, that don't connect together. If the NPF mandated this permeability and took it out of the hands of local councillors, there would be much better results in the long term.

The national planning framework needs to have a whole of government approach to sustainable planning. It is essential that services provided by the state should be provided in sustainable locations within our towns and cities. We need to reverse the trend where schools and HSE facilities are developed on the periphery of our towns. Sites may be cheaper in these locations, but the longterm costs of unsustainable development in car dependent locations needs to be taken into account.

If the planning framework is going to remove the power of local authorities to restrict heights, it will need to balance this by insisting on new standards for high rise development. The architect Neave Brown has recently been awarded the laureate of RIBA Royal Gold Medal for architecture in the UK. He argues that high rise development tends to be successful in high income communities because they are willing and able to pay for concierges, high quality intercom and security systems, high quality and reliable fast lifts, and ongoing upkeep and maintenance. Without this attention to detail high rise living can quickly deteriorate into poor quality living. We should not repeat the failures of high rise development of the past.

The document should be used to set out where national infrastructure should go. For example where should wind farms go? Where should solar farms go? Ideally we should not be using our best agricultural land for solar farms, which might be better suited to marginal farming land. We need to set out corridors for public transport and cycling routes, but also for the electricity, gas and water networks.

A lot of development in the last two decades has been built around distributor roads, with residential development set back behind walls. This leads to poor permeability, poor access to public transport and severe congestion on the distributor roads. This type of development should be stopped and the Manual of Urban Roads and Streets should provide the template of how our streets should be designed.

Connections between Northern Ireland and the republic of Ireland should be emphasised. The Dublin Belfast corridor will be a vital corridor for future development. And the north west of Ireland should have strong connections across the border.

With the prospect of a hard Brexit, we need to emphasise the importance of our ports, especially Rosslare in the South East. There needs to be high quality connections between Dublin and our other city to these ports, in particular we need high quality public transport to these ports.

There will be a need for new political structures to make decisions on planning for the Dublin Metropolitan Area. This area goes into Meath, Kildare and Wicklow as well as the four local authorities of Dublin.

The pictures in the NPF documents should all have legends!

Regards

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