

## 2 Ireland's National Planning Challenges

XX Facilitate improvements to people's quality of life and well-being;

A nice dream historically there is no indication that government local or central will deliver. This because now any development of over 100 (approx) houses by passes the local authority and goes straight to central government for decision.

Under EU directives there are requirements to produce plans to manage traffic noise yet there is no process to implement such these plans. It seems that the best place to build housing is beside busy roads.

Similarly when we look at areas for development in city area, Sandyford and IFSC, the developer and the financier win by getting 'shoe boxes' that pass as residential units where residents have to go 'outside to change their minds' and then they find the residents they have to live in are poorly built and fire are traps. This leaves a large number of citizens with effectively an un-inhabitable residence and if they were buying the apartment an asset that cost significant money to return it to a safe state to live in.

XX Prevent further overdevelopment and sprawl;

Why has what is disparagingly referred to as sprawl to be capped? This sprawl forms the type of environment that most people would aspire to live in, houses that have a reasonable garden not a nominal grass patch that developers call a garden or apartments with little or no outdoor space for the occupants – the current developer led planning process is what causes overdevelopment. I don't know of a city across the world that doesn't have a mass movement of people in in the morning and out in the afternoon and similarly at the start and end of every week. This is even more pronounced at holiday time.

Listening to the traffic news every morning is a story of traffic jams into and out of our major cities – conclusion people either can't afford to or cities do not deliver a quality of life environment in which to live and bring up their children.

XX Encourage population growth closer to where employment is located and is likely to be;

People buy/rent where they can afford not where they want to live. Before the financial crash there were TV programmes showing instances where people were developing store rooms to rent out to those who need somewhere to live.

XX Identify and support employment potential throughout Ireland, including greater regional employment growth;

When is officialdom going to take an interest in the citizens and their living conditions before employment potential? I know the Tammany Hall definition of loyalty – someone on who when bought stays bought.

XX Identify measures to encourage both rural and urban regeneration to address decline;

This would be better described as support for the developers.

XX Relieve development pressure on the Eastern part of the Country whilst protecting the key role played by Dublin;

This will not happen as the developers know that they will make bigger profits in the larger cities, particularly Dublin, where shortages allow them to charge premium prices and politicians allow exceedingly high density of population without providing adequate recreational areas and means where by children can be supervised.

XX Ensure good environmental stewardship by avoiding any further deterioration and addressing existing deficiencies;

Regrettably one can only be jaundiced in one's view of this when areas like the IFSC, Beacon Quarter in Dublin and have the spatial failures of Ballymun, with no access to recreational areas resulting in children being stuck on upper floors up as parents are not prepared to let them out to play.

This is before the issues of questionable standards of developments is considered. The numbers of apartment blocks without or with substandard fire protection need to be thought about, particularly in the light of this morning's news item about repair costs of repairs that will be imposed on property owners in Beacon Quarter in Dublin.

XX Reduce carbon emissions;

Another wonderful aspiration however there is no information about how the ordinary citizen will benefit for reduced emissions. The individual has to benefit financially as well as with a better.

I attended an information session at which the SEAI were present but they had difficulty providing an indication of ROI of the different domestic carbon reduction processes available. So the householders couldn't know which was the best option available to them.

When considering carbon emissions we need to look at traffic jams in an article I read recently 660 million hours are lost by citizens per month stuck in traffic jams. All of this time carbon fuels is being burned.

In Ireland ramps are growing like cancers in virtually every urban area leading to stop/go driving and we know acceleration leads to burning greater volumes of fuel – more pollution.

A similar story can be seen when looking at transport. I don't know of a journey that isn't faster by private car than by public transport. If an example exists its because traffic lights are set to turn red as traffic approaches, not green. Anywhere traffic 'improvement' schemes are undertaken traffic jams result.

Sure I'm open to the idea of electric and hybrid cars but thanks to government I can't afford a new car.

There is no clear and supportable return on investment (ROI) or comfort benefit for making my house more energy efficient.

XX Prioritise the development of infrastructure that can deliver national benefit – including renewable energies;

Previously infrastructure was put in place using public private partnerships (PPPs), instances being toll bridges or routes yet when paid off the tolls were not removed – the M50 toll is now in its second or third iteration and the east link has become a cash cow for Dublin City Council. I understand that there are other PPP's but there is no indication when these PPPs be paid off and terminated. Why prioritise infrastructure when the only beneficiaries' will be developers and financiers.

XX Harness the planning system in order to maximise the role it can play in relation to climate change;

The planning system is developer driven. There is nothing in it for the private citizen. If the citizen wants to object to a planning application to retain the features of an area there is a fee - €20 (approx which requires the individual to earn approx €30 when taxes are paid on income), there has to be a better way to encourage involvement in the planning process.

As mentioned previously a 100 house planning application goes to An Borad Plannala away from local consideration.

XX Manage the planning and development process so that the right development occurs in the most suitable places and at the right time, ensuring sustainability and best use of scarce resources.

I don't believe that the citizen is considered in this process. My local authority has a population of 210,000 approx there were around either 300 or 700 submissions to the development plan – my view is that the people don't believe that its worth making an effort to comment.

## 3 People's Health and Well-Being

XX Are we prepared to make changes now so that a 'healthier places' legacy can be handed over to the next generation of Ireland's citizens?

The people are but I don't believe that the government and the developers are. It has been clearly established that people have less stress in their lives where they have the opportunity to be exposed to a natural environment – parks, fresh air, rivers, lake and the sea. Similarly where stress levels are lower. Ireland has one of the higher levels of suicide

Government policies do nothing to reduce the stress levels in the lives of citizens by creating in

XX What policies can the NPF include to effect improvements to our general health, including physical and mental wellbeing, in Ireland over the next twenty years?

Parks, open spaces, access to open spaces around rivers and the sea are know to reduce stress, and increase well being and health these facilities need to be included in plans for areas. The importance of these facilities can be seen in Dun Laoghaire every summer where very big numbers of teenagers visit and to benefit from being beside the sea.

XX Are there key priorities the NPF can identify to ensure better or improved health and wellbeing of people and places in Ireland?

XX Are there facilities that the NPF needs to highlight for places in Ireland in order to enable greater participation in a healthy lifestyle?

In the greater Dublin area Dollymount Island is effectively inaccessible to the citizens. On the south side of Dublin virtually anywhere beside the coast is effectively inaccessible to vehicular traffic because of lack of parking and parking charges.

## 4 A Place-Making Strategy

XX Taking on board all of the relevant environmental and physical capacity issues, what role should our cities have as part of the NPF?

We need communities where citizens can live and be fulfilled not 'Places' where developers get rich on the back of the community.

We can see that the government have no or little interest in the community. This is evidenced by the reduction in pubs, churches, banks and my expected cutbacks in Post Offices centres necessary for communities.

Furthermore we can see the shortcoming of urban development because cities the world over have a mass exodus every night and an even greater one at weekends and similarly a mass ingress in the mornings and at the start of the week, because people either don't like leaving in cities or they cant afford to do so.

XX How might we develop one or more strong regional complements to Dublin that can address their whole city-region, including interactions between settlements?

XX Do we need to reform and strengthen administrative and governance structures so that they are capable of delivering the necessary alliances, collaboration and actions to build up our cities and their regions?

What we need to develop is a structure where the people feel their input to the policies that mismanage building development is listened to and carried an influence.

I think its worth thinking about the government enquiry into planning where I believe that saddest thing, was that the politicians investigated sold their votes so cheaply, they had no idea of the real financial value of what they gave away.

XX How might we develop an urban policy that distinguishes between development within the existing built-up area of cities and towns and greenfield development sites?

Why should the quality of life of residents, of the build environment or of life style be any different for citizens in build up areas of cities and towns compared to those in Greenfield development sites.

XX How might we distinguish between the role of towns within the wider hinterland of the cities and those located outside the influence of the cities?

XX What measures could be used to examine potential densification scenarios that may be applied to parts of existing urban areas?

The question that need to be answered first is whether the densification will provide an attractive environment for residents – I see no evidence to support such a case.

The organisation that has made the one of the strongest cases for densification of habitation has been the

## 4.2 Opportunities for our Regions

XX What are the levers for effective regional development?

XX What is needed to be done to increase human capital at a regional level?

The more fundamental question is how to develop human capital in urban areas. It seems that areas outside urban areas are far better at circumventing the heavy hand of officialdom and developing their communities.

XX What regional 'value proposition' i.e. an innovation, service, or combination of measures and approaches can make the regions more successful and what are the means by which this can be achieved?

XX Are there strategic issues (i) across local authority boundaries or (ii) on an inter-regional basis, that the Regional Assemblies can co-ordinate to ensure more effective sub-regional and regional outcomes?

XX Are there funding opportunities than can support investment on a regional basis?

## 4.3 The Potential of Rural Ireland

XX How can the NPF capture (in a national, strategic policy context) the range and quality of resources that exist in rural areas that could be leveraged to support national economic growth, climate action objectives and the development of local communities?

XX What are the solutions to maintaining population in those rural areas where decline has been experienced?

If rural areas are to retain and attract population they need services for their people and places where people can transact business, meet their neighbours and interact with their communities. For this to happen they need churches, shops, Post Offices, Garda Stations, banks and transport services.

XX What role should towns and villages in rural areas play in catering for Ireland's future growth?

The towns and villages need to be capable of supporting communities of people.

XX How can the rural parts of Ireland close to urban areas be protected from development pressures that are likely to arise to accommodate further population growth?

XX What measures need to be in place to allow those who have a genuine need to live in the countryside to be accommodated?

#### **4.4 Ireland in an All-Island Context**

XX How can the NPF facilitate co-ordination between settlements that share connections across the border between Northern Ireland and Ireland and how should this be reflected in the document?

XX What economic opportunities and sectoral clusters exist that can benefit economies within both jurisdictions and how can this be best captured and supported in the NPF?

XX What mechanisms are needed to ensure a joined-up approach to strategic infrastructure and investment decisions that have a cross-border dimension and are there examples of best practice?

XX How do we co-ordinate mutually beneficial ways to address common environmental challenges across shared catchments?

#### **4.5 Integrated Land and Marine Development**

XX In thinking about what Ireland might look like in twenty years' time, what is the future for the Ireland's coastline, islands and offshore?

XX How can coastal and island communities contribute to a national vision for Ireland, as part of the NPF?

Do coastal communities include communities who are close to the sea in urban locations, e.g. parts of Dublin, Cork, Limerick etc.,

XX How can the goals of the integrated Marine Plan be spatially represented in a National Planning Framework?

XX What policies, measures or actions need to be advanced to enable Ireland's marine resource to adapt to the effects of climate change (e.g. coastal erosion, flooding, sea level rise etc.)?

XX What infrastructure investments need to be made in order to maximise the sustainable potential of our ocean resources?

## **5 Ireland's Unique Environment – Climate Change and Sustainability**

XX How can the NPF help to ensure we get a sustainable balance between catering for a growing population and avoiding or addressing environmental pressures?

XX How do we plan for growth in such a way that supports a transition to a low carbon and climate resilient economy and what planning policy measures are needed to achieve this?

XX What strategic energy infrastructure is needed to support the economy and society and realise the transformation of Ireland's energy system to meet climate change and energy obligations and in what areas should it be located?

XX Are there any other national environmental issues that you think should be included within the NPF and that are within the remit of planning policy?

XX An SEA scoping document has been developed in tandem with this paper. What are the relevant significant issues to be addressed by the SEA, AA and SFRA and what environmental objectives should be used?

There is no explanation of the acronyms, SEA, AA & SFEA – this makes it a little difficult to comment on.

XX What measures should be implemented in order to safeguard our landscapes, seascapes and heritage and ensure that Ireland continues to be an attractive place to live, visit and work?

## **6 Equipping Ireland for Future Development – Infrastructure**

XX What are the nationally important infrastructure projects for Ireland that require delivery over the next twenty years?

The ending of road tolls when they reach the end of their contract period.

When national hospitals are developed they need to be places where the citizens can easily access them. The proposed new hospitals on the St James Campus and on St Vincents Campus in Dublin are very difficult to access particularly from outside Dublin. No individual who is seriously sick or those with a sick child would use public transport to access these institutions. They are also abused by the parking charges that are imposed on visitors in these cases.

XX What do we need to do to make best use of existing infrastructure?

Give the citizens of the state value for their money. Recognise and deliver what the people want, giving between 50% and 60% of major roads in urban areas over to bus lanes and having traffic lights turn red as traffic arrive instead of turning green. Listening to traffic news, morning and night, the block points on all of the major router into and out of major cities can be identified by the traffic reports.

XX How can we ensure that the provision of infrastructure can be planned to match future demand and how can the NPF reflect this?

There needs to be a certain provision for infrastructure, roads particularly of every class, need to be put in place with every number of citizens in an area. If Dublin and most cities are considered the only thing that allow them to survive are the results of the 'wide streets commission' of the late 17 hundreds or early 18 hundreds.

XX How can capital spending on new infrastructure be sequenced in a way that is affordable and equitable, while taking account of Ireland's Climate Change obligations?

We need infrastructure that actually meet the needs of the citizens nor of the policy makers.

If cycling infrastructure is put in place then it needs to meet user needs. Present instances of cycle infrastructure can be best instanced as 'badly designed, badly built and badly maintained.,

XX How do we ensure that existing and new development can be supported by the timely provision of social infrastructure?

## **7 Enabling the Vision – Implementing the National Planning Framework**

XX When it comes to implementation and monitoring of the NPF, are there common goals that can be identified and apply to every place?

The ordinary people need to benefit. The idea and concepts need to be explained to the people not just to the developers and politicians so they can take care of each other.  
How attractive is it to individual. Can people go to live there without incentives.

XX How best can sustainable planning outcomes be recognised and rewarded?

The question is who benefits and who collects the rewards.

XX What barriers exist to implementation?

The Government is only interested in business not in the individual. The citizen is seen as a 'cash cow' is can clearly seen how

XX What levers are needed to deliver greater efficiencies in administration and governance, when it comes to implementing and monitoring the NPF?

This question is evidence that officialdom has not learned the lessons of P. Flynn's abolition of the building control system as evidenced by the problems that have arisen in apartment blocks with ineffective fire prevention systems and the whole pyrite issue where purchasers have been left 'high and dry'

XX What the key indicators for measuring the successful implementation of the NPF?

I don't believe there are any because I don't believe that the small people will benefit from this work. Possibly if ordinary individuals choose, not have to be 'bribed', to live, work and recreate a community outside urban areas.

Comments:

1. The country is being run for the benefit of the developers, FDI's and the politician's friends, as instanced by the sale of NAMA property to vulture funds, similarly the famous Ballsbridge site that was the most expensive just before the crash – the developer could only do that on an expectation that he would get a bigger building on the site.
2. An explanation of the initials, SEA, AA and SFRA, would be very helpful. This would help interested parties to consult documents referenced.

Brendan Donohoe

email: 