

From: Charles Stanley-Smith [REDACTED]
Sent: 29 March 2017 18:51
To: National Planning Framework
Subject: Personal submission to NPF

Follow Up Flag: Follow up
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Dear All,

Below is my personal submission to the NPF

With Best Regards
Charles Stanley-Smith

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I would like to see higher emphasis on:

Climate Mitigation and Adaptation

- 2°C target looking increasingly improbable
- Originally Decarbonisation by 2050. However event horizons growing closer
- Transition to Decarbonised Society must be the overriding imperative in this period to 2040.
- Requires a complete rethink of future development and growth policies
- NPF & NCMAPs (National Climate Mitigation and Adaption Plan) must be integrated and provide measured targets to reduce
 - Transport Emissions
 - Energy Demand
 - Must also address infrastructure vulnerability
 - Sea Level Rise
 - Flood Risk

Sustainable Development Goals

- Apply to all countries including Ireland
- 230 indices proposed to measure all countries

Community Well-Being

- More than individual Well Being/Health (as in NPF)
- Quality of Life through Community Wellbeing
- Another set of indices (some overlap with SDG's) but at Community Level

Community/A Sense of Place

- NPF must support Placemaking/Sense of Place
- Walkable/Cyclable
- Community Facilities
- Local Economy
- Local Food Systems
- Local Resources to meet daily needs
- Active citizenship – getting involved
- Participating in Local Decisions

Local Economic & Community Plan (LECP)

- The key objective to promote a more integrated and targeted approach to addressing the strategic social, community and economic issues facing the County of Tipperary in a way that meets the priority needs of the community.
- What constitutes the needs of the community is heavily influenced by the views sought from the communities themselves through the LECP consultation processes, but within the context of

Government Policies and priorities.

Local Economic & Community Plan (LECP)

- The process for the preparation of the LECP was underpinned by a number of guiding principles which include:
 - Sustainability
 - Diversity
 - Promotion and mainstreaming of equality
 - Community development principles
 - Maximizing returns from resources by avoiding unnecessary overlap and duplication and by achieving synergies through co-operation and collaboration
 - Participative planning
 - Community consultation and engagement
 - Accessibility and ownership
 - Sustainable development
- LECP's will be required to integrate with NPF – but should NPF not integrate with LECPs?

Community Development and Integration

- All planning for new housing must be conditional on:
 - integration with existing communities
 - affordability and mix of housing types
 - walking and cycling access to local services and schools
 - public transport access to employment locations and availability of recreational facilities.
 - Meet the (improved) criteria of Box 5.2 of the National Spatial Strategy

Stop Sprawl

- Developer Led
- More sprawl – more resources we are over using
- Fossil Fuel Dependant – Climate Change disastrous – Transport disastrous
- Lack of Community – lack of Community Services
- Cost of providing Services
- Encroachment onto sustainability, agricultural land, water quality, land use change, bio-diversity.
- Why not Plan Led Compact development – walkable (cyclable) communities

Resource Protection - Soil

- Agricultural Land is an important resource
- Soil formed from thousands of years of physical & biological processes – takes as long to reform – they are essentially non renewable.
- Under threat from land use changes, intensification of agriculture, erosion, overgrazing, afforestation, industry and urbanisation
- [Environmentalpillar.ie/people4soil](http://environmentalpillar.ie/people4soil)

Resource Protection - Water

- Need to integrate NPF with EU Water Framework Directive
- protect/enhance all waters (surface, ground and coastal waters)
- achieve "good status" for all waters by December 2015
- manage water bodies based on river basins or catchments
- involve the public
- Irish Water - Major costs required to water system
- RTE 15/02/2017 EU taking Ireland to court over waste water treatment failures.
- The European Commission has announced that it is taking a case against Ireland in the European Court of Justice over waste water treatment failures in 38 locations around the country.
- Not the first nor the last water related case gone to the ECJ

Biodiversity Protection

- Ireland as an EU Member State has committed to halting biodiversity loss by 2020 but:
 - Habitat destruction – construction & urbanisation
 - Invasive alien species
 - Pollution
 - Land use change

- Unsustainable and excessive consumption
- Climate Change
- Ensure integration with
- EU Birds and Habitats Directive
- EU Water Framework Directive
- UN Biodiversity Convention
- Marine Strategy Framework Directive

Rural Development – One off Housing

- Address rural housing dispersal by strengthening village settlements – Walkable Communities
- Recognize that the rising service cost, rural isolation and impact on an aging population, in continuing the current pattern of dispersed one off rural housing, is not in the interest of people, rural communities, or climate targets.
- Address the decline of villages and smaller towns, by proactive measures to provide serviced sites for housing need in local catchments, integrated with community based plan led strategies.
- This provides an alternative and affordable option to one off housing in the countryside for those wishing to self-build close to family ties.
- Land Value Tax - Unutilized Zoned Land
- Introduce Land Value Tax to replace Property Tax & Business Rates
- Otherwise ensure (through taxation) that unutilized zoned land in urban & village locations and transport corridors are developed

Sustainable Transport Policies

- During the time of the NPF, we will enter the post fossil fuel era.
- DTTS Smarter Travel requires that by 2020 “the total kilometres travelled by the car fleet will not increase significantly from 2009 levels” and “work related commuting by car will be reduced from a current modal share of 65% to 45%”
- The parallel National Cycling strategy 10% target for all journeys by 2020.
- Not on target to meet either
- Require significant investment in public transport but that must be integrated with NPF.

Planning for Renewable Energy

- Can someone please provide an interactive study/map/policy of the Country (Island) for suitable areas for renewable energy
- Constrained by:
 - Existing (and planned) Grid - Gateways
 - Projected Electricity Requirements by area
 - Suitable Wind/Solar/Wave/Tide etc
 - Potential for Micro Generation
 - Distance from settlements & one off houses
 - Natura 2000 sites and other protected areas