

Daniel Norton,



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NPF Submissions,
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A chara,

I was present at NUI Galway during the town hall meeting with Mr. Coveney and I wish to make some comments on the National Planning Framework – Ireland 2040:

- I feel that there is a lack of focus on planning for communities and that the documents on the website does not demonstrate what the National Planning Framework's (NPF) strategy for future planning that enhances and encourages developers, planner and society to make decisions that help to create sustainable communities and support existing communities. This could be achieved through the use of a community impact report for certain developments over a certain threshold. This could be incorporated through the existing Environmental Impact Statement (EIS) and Strategic Environmental Assessment (SEA) or through a separate community impact report system.
- The NPF should be a living document that can be adapted and amended rather than a once off process and document. This would be of greater vision and lead to more engagement other time. It should be a continuous process.
- It is encouraging to see the use of ecosystem services within the SEA scoping report. However, I believe that the ecosystem services should be incorporated within the Population and Human Health section of future SEA reports as ecosystem services are only present when ecosystem functions are interacted with by humans.
- Another question for the NPF is how will different communities' values be weighed. Currently the planning process favours existing communities and those moving into communities do not have the same weight as existing communities. In light of likely future increases in population and higher population mobility, this will be issue for ensuring cohesion within these new communities.
- The NPF discusses the incorporation of marine spatial planning which is required by the Maritime Spatial Planning Directive. What scale will the marine spatial plans be made at? Will it be at bay level or at a higher spatial level? Although the marine areas have many users, the lack of property rights means that no-one owns the marine waters around Ireland. What is the relevant community for a marine spatial plan and how will different groups values and preferences be weighted in the decision making process?

- Should a green belt be considered for Dublin city similar to other cities (i.e. London)? What are the costs and benefits for this concept from work done in other cities? Who wins and who loses?
- Should the NPF promote the use of open data for future planning permissions? The OSI's monopoly on maps for planning permission should be reconsidered in light of free mapping and also in the spirit of the INSPIRE directive. Other government datasets such as the Land registry search and CRO datasets should also be free to use.
- What is the max density that urban centres should be subject to?
- Agricultural land comprises c.70% of landcover in Ireland. How will the NPF interact with EU and Irish agricultural policy?
- How will the NPF balance the desires and preferences of the individual versus the community in making decisions?
- What will be the outcome for the International River Basin Districts in the North upon Brexit?
- What is the plan for Foreshore Licencing by 2040? Will there be reform?
- In light of the future changes due to climate change, should sterilisation of land prone to flooding be considered for planning purposes?

I hope that you consider my comments within the next part of the NPF process.

Le meas,

Daniel Norton