

I would like to include the following comments and suggestions in relation to issues to be considered in the draft NPF 2040.

Climate Change is the greatest risk to our country, communities and economy. Mitigating its effects and adapting to its impacts should be the core principles behind all future planning.

We are likely to miss our targets by 50% which may bring huge financial penalties

Consider that a small portion of development contribution levies should be used for carbon sequestration projects eg forestry, bog remediation etc based on the carbon footprint of the construction stage of the development (could also contribute to flood risk mitigation)

Energy – maximise our renewable resources to offset our over reliance on imported fossil fuels. Maximise efficiencies in energy use.

Retrofit every home in Ireland with energy saving thermal insulation and heating technology through tax credits, long term, low /interest /free loans, grants or other finance mechanisms.

Housing efficiency – attain passive standard or NZEB for all new development within 5 years and roll out training for apprentices and construction sector in energy efficiency standards/technology

All households should be fitted with energy monitoring meters/visual indicators

A national procurement scheme for refitting all street lighting with LED lamps as this is the highest energy cost for all local authorities

Transport – rebalance the investment in mass public transit over car transport.

Increase the percentage funding for cycling and walking infrastructure.

Proceed with DART Underground.

Set minimum setback for all new construction building lines to allow for provision of multi modal transport on roads. Include safe and segregated walking routes to schools.

Typical car usage in urban areas in Ireland is very suitable to electric vehicles which will become more cost effective and prevalent in future. Charging systems should be included to the exterior of all future developments and a further increase in on street points (chambers and ducting to be included in all road repairs where possible)

Agriculture – improve future food security by setting aside lands near urban areas for allotments and community gardening (possibly lands at risk of flooding or part of green belt areas)

Review land availability and soil productivity with farmers, agriculture research groups and agri-business and assess the future needs and land productivity for food production

Flood Risk – increase setback for development on areas at risk of flooding in line with 100 year events (for coastal and river flood risk)

Maintain flood plains free from hard engineered development even in locations where flood defences have been constructed.

Encourage farmers and landowners to increase forestry and other natural defences upstream of known flood risk areas and encourage protection of wetlands

Spatial Planning and built environment

In-fill development – more resources for auditing and design research of the potential of in-fill development, of higher densities and good quality design. Infill can be much closer to public transport, walking routes, safe routes to school. To assist with limiting sprawl type development and making the provision of services more viable and efficient. Also include a percentage of infill development for housing for elderly.

One off housing – over the past 5 years one off housing has accounted for approx 45% of permissions granted. This type of development is not sustainable in terms of societal, service and transport costs. Rural housing if centred around and close to rural villages and towns could revitalise these towns and limit rural decline. We need to move away from dispersed type development.

Ensure that the office of the planning regulator is created to be independent of political influence and resourced sufficiently. Ensure all county development plans and LAPS are scrutinised at draft stage for compliance with national planning guidelines

Encourage owners of derelict or vacant sites within towns to engage with planning authorities on the options that are available for developing their sites (change of use, approved housing bodies, student accommodation, LOTS initiative, town centre accommodation for elderly / trading down or persons with mobility issues etc) but also implement the VSL speedily, consistently and efficiently to encourage engagement.

Water A clean, reliable and secure water supply will be one of the most serious challenges facing our country in the future. Measures need to be included in all future developments to reduce over consumption, wastage and allow conservation. Rain water harvesting and grey water systems will be required and proper, fit for purpose water limiting devices on cisterns and showers.

Where assistance and encouragement is provided for conservation measures, a water monitoring system should be utilised to allow high volume users/waste of water be measured and a suitable application of the polluter pays principle used to recoup the cost of over consumption, with the exception of medical/other requirement for higher water use.

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