

## **National Planning Framework Draft Consultation November 2017**

**Submission by:**

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***This submission is made on a personal basis and may not necessarily represent Limerick City & County Council***

**Submission observations:**

1. Firstly, in the role of setting out national planning policy to steer Ireland on the correct course to 2040, the National Planning Framework must explicitly and strategically detail transport in all its shapes and forms; passenger, commuter, public and freight. The four modes of freight transport and their respective roles and functions should not be treated in isolation but in a holistic and complimentary way. From this basis, stronger regional economic and spatial strategies and new development plans and local area plans will be formed. The National Planning Framework also has a role to play in setting out key infrastructural decisions to 2040, to ensure passenger and freight multi-modality can be achieved to a greater extent. The draft NPF makes little reference to freight transport.
2. The Development Management function of planning authorities should be strengthened to incorporate stronger objectives in respect of location, proximity, traffic movements, parking, refuelling options, and multi modal access to key strategic developments as part of policy and therefore site assessment. Conditioning to ensure use of rail or air freight where feasible should in principle be given priority over road based movements for proposed developments. Planning should need to justify non-use of more sustainable alternatives and to quantify the carbon footprint of their proposed operations.
3. The local authority's new role in supporting economic development should be enhanced with specific focus on delivering stronger transport and logistics systems at a regional level. For consideration is the employment of specialist transport planners and transport engineers in local authorities, as a priority to support the sector in reducing GHG emission targets. A key component of this recommendation is to improve the local authority's understanding of how this complex and multi layered sector functions.
4. A stronger role should be assumed by local authorities in leading bottom up, place based and focused initiatives, given our context as an export

oriented island nation, with wide reaching and adverse implications likely as a result of BREXIT. A good place to start is through extensive consultation to assess the 'state of play' of the freight sector within a region, and realise weaknesses and key assets. For example establishing statutory based, local authority led inter-agency forums / sustainable freight partnerships at a regional level (involving public, private, academia & end user/ representatives of business) to work in a smart and collaborative manner with all businesses and citizens that rely on freight transport. This should be done in a bottom-up, place-based manner locating the industry stakeholders at the centre of the design process and new solutions. This type of governance model can then work together to support the design, development and implementation of a number of innovative actions and projects that the regional freight sector may engage in. An objective should be included to reinforce the strong role of the freight sector and how it can be best supported to 2040.

5. Objective 42 in respect of ports development should be better aligned to include policy objective on land based modality options (road and rail), ie. Connection of ports to rail at port or further along the supply chain, to increase options for freight based movements.
6. Objectives 48 to be expanded upon to have a specific objective on freight transport and improving multi modality options for freight forwarding.
7. New objective on urban based freight movements – last mile logistics and how this should be done in greener and electric vehicles, in a concise and consolidated way. ie. by providing an out of centre freight consolidation centre with retailers working together to bring goods into their city based stores. Freight consolidation centres to be located in areas with regeneration/ disadvantage, with potential to operate as a social enterprise, linked with education and training, and relevant agencies.
8. Page 111 mentions how the planning process can implement and integrate climate change objectives but how? This to be indicated more specifically.
9. Objective 65 – split city/ town/ rural as each area is unique. Emphasis should be on making towns and villages grow bigger and to look inward to identify vacant units and buildings and address vacancy in a community led approach.
10. Development in the open countryside should only be in exceptional circumstances, there is an opportunity to target vacancy and make these properties available to people as opposed to continued policy in favour of one off rural housing. Case study: Limerick City & County Council have set up a new Urban & Village Renewal Department with this function.
11. In respect of rural housing, applicants should be made demonstrate that no other option exists, ie. Vacant house/ cottage in a 2 km radius of proposed site. Incentives such as lower vat rate on services and materials should apply to developing/ renovating existing houses/ cottages (case study: Cottages in Scotland attracted a lower vat rate for refurbishment purposes).

12. Expand objective 18b to include criteria of distance of place of work from proposed site for Applicants. If distance is in excess of 45km (40 minute commuting journey), the development should not be granted. Excessive commuting from one off housing, to work in town and city centres is having an effect on traffic volumes, reduced public transport usage, CO2 emissions, increased car ownership and linked lower disposable income, decreased quality of life for commuters and their family's well being, decreased quality of time, health and mobility issues, reduced time to avail/ partake in family/ community life, etc. and must be tackled as part of the NPF.
13. Objective 67 – modality or public transport and freight transport to be considered as factor in determining zoning in all instances.
14. Add national strategic objective 'Transition to decarbonised energy reliant economy' for both public and freight transport.
15. Objective with specific regard to the electric car charging network infrastructure and to support electric car take up (purchase/ rent) to be developed. Continued investment needed to support the network and allay potential users' fears.
16. Electric car charge point and parking space should be a mandatory development standard for all development applications (commercial/ industrial/ retail above a certain size for example 10 employees).
17. Add national strategic objective 'Sustainable freight mobility' and expand on what this objective is.
18. Expand objective 35 more significantly 'To empower rural communities'. As already mentioned there is a need to tackle vacancy in all small towns and villages, based on CSO data 2016. Local authorities need to play a greater role in identifying buildings and owners, constraints, establishing development potential, aligning local or national incentives to support return to use, and in making these properties more attractive overall.
19. Objective 46 expand as foreign direct investment is also required to support and rejuvenate rural areas. The IDA need to make smaller towns more attractive for inward FDI, and to therefore support local populations to stay local and contribute to local economies. Supporting rural economies cannot only be about niche sectors, tourism and agricultural diversification but how we can return to substantial FDI investment in these areas. Case study – FDI investment by Ortec in Newcastle West, and the work of Innovate Limerick in taking over and managing Community Enterprise Centres that suffered a decline.
20. Expand objective 28 to include specific objective on walking to school. This should be followed through as part of smarter travel objectives and actions at regional and county level. Progressed by local authority taking lead role and working with the relevant agencies, schools and parents. Apps and rewards could play their part in incentivising walking. Perhaps retired community leaders or stay at home parents could help by be the supervising person walking students to school on particular days each month. The fresh air will help everyone! This is a major issue in cities where school related congestion is evident.

21. Expand objective 29 in respect of locating preschools in close proximity to nursing homes and retirement homes or voluntary housing schemes, and incentivising the managements to allow for young children to spend time with the elderly. Opportunity exists for new developments to adopt this principle of co-location. Case study – Channel 4 documentary ‘Old Peoples home for 4 year olds’, 2017.