



Mill Road, Corbally,
Limerick. V94 RW2

Adam Kearney BA, MA
(Planning Consultant)

Phone/Fax: +353 61 341782

VAT: IE5930270L

Email: info@akplanning.ie

NPF Submissions,
Forward Planning Section,
Department of Housing, Planning,
Community and Local Government,
Custom House,
Dublin D01 W6X0

10^h November 2017

To Whom It May Concern

I would like to make a brief submission with regard to the Draft National Planning Framework.

Projected Growth of our Cities

There is a realisation that to provide a counterbalance to the growth of the Dublin metropolitan area is essential. However the plan is not ambitious enough. Limerick, Cork, Waterford and Galway combined are projected to have a population of 677,000 by 2040. I believe we need to create cities with sufficient critical mass to function as recognised international urban locations. 250,000 must be the minimum population target for Limerick and Galway, and 500,000 the ambition for Cork in the period with Waterford to surpass 100,000.

This will take the regional cities to a combined population of 1,100,000. The Cork, Limerick Galway conurbation with the addition of motorway connectivity between Cork and Limerick should be seeking to achieve 1,000,000 populations alone if it has ambitions to be a real counterweight to the Dublin Area.

Such population growth projections would support transport interconnectivity outside of Dublin and specifically within the western conurbation supporting the provision of modern and efficient intercity train services and expanded regional airports at Cork and Shannon taking them to the level of airports like Manchester airport in the UK.

If one looks to Denmark with a similar population and land mass to Ireland, you will see city sizes more evenly grouped in terms of populations. The major cities outside of Copenhagen have a combined population that surpasses Copenhagen's thereby providing more balanced and sustainable regional growth.

Rural Regeneration

It is all good and well to promote the renewal of small towns and villages but the plan again is not ambitious enough to effect real change. While we have an imbalance between Dublin and the other large urban centres in Ireland there is also an imbalance between small towns and villages and larger towns and cities that will be difficult to bridge without radical measures.

Villages far removed from large urban centres are dying, as they are not desirable locations for commuters. Many of these villages have the physical and educational infrastructure to accommodate increased populations but will not realise such increases without tangible fiscal incentives for business and for the provision of housing.

While Broadband connectivity is being touted as the key to the revival of rural areas, I do not believe this to be the case in isolation.

I would recommend

- Long term tax incentives for companies and staff relocating to rural villages and towns identified as structurally weak (A register of such villages needs to be compiled using agreed criteria around employment, population levels and demographic breakdown, school numbers etc)
- Reduced Commercial Rates or no commercial rates in villages and towns designated as structurally weak
- Zero Development levies for new housing in these areas
- Reduced LPT
- Where Irish Water wastewater infrastructure is at capacity and funding for new investment is not foreseen allow for urban or urban periphery serviced sites with co-operative treatment plants maintained and managed by the local authority to a high standard (I believe Tipperary County Council are presently considering or implementing this approach)
- Allow for Neighbourhood plans as part of a new bottom up approach to rural planning

Once an area is no longer structurally weak the above fiscal measures can be unwound

Planning System

Planning Applications:

The administration around planning applications in Ireland needs to be centralised for the purposes of standardisation of validation and the treatment of development proposals. The lodging of applications could be centralised digitally akin to the planning portal in the UK.

It is not acceptable to have different interpretations of the planning and development regulations throughout our local authority system. The aforementioned central repository for accepting applications would go some way to remedying this situation.

Development Standards

Each individual County Development Plan has differing standards around such items as separation distances, car parking provision for certain uses, open space provision etc. This is unnecessary and confusing for national house builders, nursing home providers retailers etc. Local authorities should be bound by national guidelines for the development of urban areas

Zoning

Zoning decisions can ultimately be made by elected members for an area every 6 years. While I recognise the democratic process the zoning of land is a specialised discipline requiring vision and the understanding of population trends, infrastructure limitations etc. I would recommend that

- The Planning Regulator have an input into the zoning process for Local Area Plans and County Development Plans
- That landowners or development land promoters have a right of appeal over zoning decisions.
- That an mandatory 3 yr. interim review of all plans be allowed in order to provide a more dynamic and responsive system.
- That a bottom up system of neighbourhood plans similar to the UK be introduced to revive rural areas and give ownership to small villages and towns without the requirement for formal town councils. Formal elected but voluntary parish councils with unpaid members like the UK would be an option. The clerk and office could be financed by the Local Authority.

Critical Infrastructure

It is not sufficient to fast-track planning decisions without tackling the judicial process post decision. Legislation should be introduced to protect against protracted and often time vexatious legal challenges.

Yours Faithfully,



Adam Kearney

BA Hons, MA Urban & Regional Planning

