

First Revision to the National Planning
Framework Consultation,
Department of Housing, Local Government and
Heritage,
Custom House,
Dublin 1,
D01 W6X0
Via Consultation Portal

Transport and Mobility Forum, Cork
www.transportandmobilityforum.com
tmfcork@gmail.com

c/o The Environmental Forum
Bernadette Connolly
Mount Carmel, Kilcolman
Enniskeane, Co. Cork
P47 C578

12th September 2024

Public Consultation – Response

Draft First Revision to the National Planning Framework

[Draft First Revision to the National Planning Framework | the Department of Housing, Local
Government and Heritage Consultation Portal](#)

Introduction

The Transport and Mobility Forum, Cork (TMF) is a cross-sectoral representative group of organisations who have a common interest in sustainable travel *. The TMF fully supports measures and policies promoting sustainable and active travel. Sustainable and Active Travel (cycling and walking) help to reduce congestion on roads, improve air quality, support a low carbon economy, reduce noise pollution and improve public health.

As such it is the TMF's aim to support the **UN's Sustainable Development Goals**, in particular SDG 3 (Good Health and Well-Being), SDG 11 (Sustainable Cities and Communities) and SDG 13 (Climate Action).

We would like to take the opportunity to comment on the Draft Revision of the NPF while offering the following comments for further improvements.

Overview and general response

Our view on the overall vision and objectives of the draft framework.

We feel given the strong emphasis and acknowledgment in this strategy that the key importance of achieving compact growth and the central objective of the NPF should be to move the focus of the Irish planning system from one of preventing over-development to one of preventing the under-development of urban areas. The focus should be aimed at ensuring that all new developments are more easily accessible on foot, by bike, or by public transport rather than prioritising private motor vehicles. Strict limits should be put in place to ensure all development is proximate to a town centre or public transport hub with sufficient density and permeability to allow all everyday journeys to be easily carried out within that community on foot or by bike with frequent and accessible public transport within and between these communities.

While we are impressed and supportive of the strategy and vision of the plan, we will outline below how we are concerned that merely acknowledging this issue, rather than providing clear measurable, and compulsory targets to ensure more compact sustainable growth and the transition to more sustainable, healthy and liveable communities will not occur. As a result, providing, encouraging, and supporting more financially, socially, and environmentally sustainable modes of transport will be immeasurably more difficult.

Our general priorities, how and why there is such a close relationship between transport and spatial planning.

The TMF strongly supports measures that reduce the health, social, economic, and environmental costs of transport. The rapid transition to more efficient transportation is of vital importance to the nation and requires us to act rapidly. The best, easiest, and most effective way to achieve this is to reduce the distance needed to reach everyday destinations.

See Appendix 1 for more details on our views regarding emissions reduction.

We believe that the most important requirement for achieving these priorities is a planning system that prioritises compact walkable development while prohibiting low-density, car-centric design and “out of town” type developments leading to sprawl and car dependency. As such spatial planning is the most important determinant of progress to a more sustainable transport system.

This requires implementing a number of policies in combination. And that the document should contain firm commitments to such policies, including a requirement to achieve specific measurable outcomes. These policies have a cumulative, synergistic, and multiplicative effect. While these policies are generally useful and warranted in isolation, they will be vastly more effective in combination with the weakest link in the interaction between proximity (density/permeability), comfort/safety (appropriate infrastructure), and incentives having the most influence.

In our view, the above should be the guiding principle of all attempts to transform our transport system into a more sustainable one, with the most important aim of reducing the distances of the necessary daily travel by our population.

These policies should at minimum meaningfully address each of the following issues.

- A clear commitment to ensuring that our streets and roads are safe, comfortable, attractive, and accessible to people of all ages. Where everyone will feel safe to not only walk out their front door or gate to walk or cycle without fear of traffic, special equipment, or need for precautions but also to have the confidence to let their children go out unsupervised without concern.
- A combined standard for density and permeability which specifies minimum targets for the number of people to be within walking distance of developments.
- Minimum limits for urban densities, in both units per hectare and in FAR (floor area ratio).
- Minimum permitted urban block sizes to ensure permeability
- An obligation on local authorities to work to “retrofit permeability” in existing communities by opening up cul de sacs, removing hostile roadways dividing communities, and creating strategic active travel links.
- A national standard for a minimum number of stories to be achieved in suburban, urban, and town centre developments.
- Planning regulations to ensure active street frontage rather than blank walls or a frontage set back behind parking or front gardens.
- Limiting parking through planning restrictions, parking levies, banning free parking, and the construction or sale of parking as part of residential, office, or retail units.
- The provision of safe, direct, and attractive cycle & walking routes as part of all new developments.
- Parking maximums.
- An obligation on local authorities to infill low-density suburbs and wide road corridors.

Planning measures required to achieve compact walkable communities.

The importance of compact walkable communities to transport, health, and community.

There is a need to move away from low-density or impermeable settlement patterns that necessitate long-distance travel for daily activities due to a lack of amenities within walking distance of homes, workplaces, or recreational areas. This inevitably results in car dependency as it is the only practical mode to travel the long distances required to live everyday life.

In order to transition to a more sustainable efficient transport system the first and most important priority is to decrease journey distances by ensuring more people are within walking distance of home, place of work or education, and recreational activities. New developments should be designed, and existing communities retrofitted, as more compact and permeable, which would significantly diminish the negative social, health, and well-being impacts of driving, while enhancing the advantages of active travel.

Achieving this will not be possible without a large number of changes to the way we currently plan and develop housing, commercial developments, and infrastructure as well as significant retrofitting of our existing developments. The success or failure of this endeavour will require that most if not all of these steps are achieved and will in fact be most critically dependent on whichever steps are last or most poorly implemented.

We suggest therefore that planning guidelines as outlined in the following suggestions become national policy or are incorporated at city and county development plan level.

In short the focus of the Irish planning system needs to be transformed from one of preventing over development to one of ensuring that development takes place at as high a density as is possible. This should still ensure sufficient living, recreational, natural, and open space along with the incorporation of light and air. We need to shift the mindset from one that limits the number of units or the height of developments to prevent overdevelopment, to one that increases the minimum number of units or height. This approach ensures a sufficient population within a development to support all services within walking distance and fosters a vibrant community by having enough people in close proximity.

Required planning policies.

1.

It is vital that all future development, with only very limited exceptions, should be more easily accessible by foot and bike or by public transport than by private car.

This requires not only that spatial development ensures **compactness, density, and permeability** in new and existing communities but also that space is not prioritised for the use of private cars. Parking, wide streets, or distributor roads push people, services, amenities, jobs, and destinations further apart, making active travel impractical, public transport less efficient and the private car more attractive.

2.

Policies for a **combined standard for density and permeability** which specifies minimum targets for the number of people to be within walking distance of developments. Where all everyday journeys can be undertaken by foot, bike, or public transport, people will usually choose those modes. However, if any regular weekly journey requires, or is perceived to require a car, most people are forced into car ownership. This often leads to car dependency, as the vehicle is likely to be used for the majority of journeys. To avoid car dependency, everyday services must be within reach by walking, cycling, or public transport. This requires a population density within walking and cycling distance, or along public transport routes, that is sufficient to easily support these services. This in turn requires a sufficiently high gross density, as well as a sufficiently permeable street layout to ensure that destinations within theoretical walking or cycling distance are actually reachable via accessible walking and cycling routes. Therefore, it is far more important to concentrate on the gross density within our communities rather than the net density within a development.

We recognise that it is impractical and undesirable to penalise, or to be perceived as penalising development within communities, which are at an existing low density by requiring far more ambitious

and potentially costly designs to maximise density within those developments. However, guidelines must reflect that it is the gross community density that determines whether development is sustainable and walkable or car-dependent and unsustainable.

3.

Guidelines must put more emphasis on the permeability of developments and more particularly on how developments improve the permeability of communities. Density, permeability and compactness are all equally important in ensuring the creation or maintenance of sustainable communities.

For this reason, the guidelines must include **guidance on setting targets for either or both the number/availability facilities** such as schools' shops employment and other destinations **or the gross population within walking and cycling distance** or easily accessible by public transport.

4.

Conversion between dwellings per hectare (DPH) and population within walking distance. The presence or absence of services and amenities within walking distance is dependent on there being a population capable of supporting these as well as services and amenities. Increasing the DPH not only allows more people to live closer to existing services and amenities, it also allows the presence of those services and amenities within communities, which at a lower density would not be capable of supporting them. This multiplication effect of density means that there is a critical density at which certain services can appear within communities, but in practice there is a single critical density where a critical mass of services can be supported within a community to allow people to form the habit of walking to most services locally rather than the habit of sitting into the car every time they leave the house, resulting in no services being present within the community.

This **absolute minimum sustainable urban density is in the region of 10,000 people per square kilometer**, given reasonably good permeability and good compactness within the community and assuming mixed use zoning allows the presence of such services and amenities within the community.

In order to convert the population required to support a given service or amenity into a minimum DPH which can support those services or amenities within a community it must be assumed that a maximum of 50% of the growth area within a community or within walking distance is residential allowing space for major roads and parks, schools, commercial uses and the presence of flood zones and other environmentally sensitive areas. Even with excellent permeability only 50% of the area theoretically within walking distance as measured by a circle on a map can actually be reached within that distance on foot given the road network thus the minimum DPH which is required to support a given service or amenity is approximately 4 times that is in reality approximately 4 times what would be required we're 100% residential coverage and reckoning walking distances by a circle on a map.

This must include a sufficient density of social open space, active open space, and natural open space as usable public green and blue spaces.

5.

Existing Irish planning guidelines **dramatically underestimate the densities achievable with traditional Irish terraced housing**, for example the Industry Street area in Cork City has 74 substantial three-bedroom terraced houses on 0.6 hectare, giving a DPH of approximately 125. While these late 19th early 20th century terraced houses do not meet modern building standards, building to three rather than two stories on the same footprint can easily achieve modern standards for space and separation if no front gardens or parking are included. As an extreme example, Corporation Buildings in Cork City achieve a DPH of 240 with their own door terraced accommodation.

6. Consideration of local character and amenity should in the context of urban centres include a minimum number of stories and adjacent green squares and parks built in the same period. The traditional vernacular building patterns for cities such as Cork, Dublin or Limerick was for four to six storey buildings lining city streets, with lower three-storey buildings on back lanes. One or two-storey buildings, other

than monumental buildings such as churches, theatres etc. were present only as insubstantial slum or shanty type dwellings.

There should be a presumption that **urban building should be a minimum of three storeys within urban settlements and the minimum of five storeys within an urban streetscape.**

7.

Car parking should not be allowed as part of residential developments except for disability access deliveries or to be sold separately only where demand ensures but the market price of the car parking space exceeds the gross costs including land and missed opportunity costs of building such parking.

It should not be possible to build any housing where the cost of providing parking is included in the cost of building, buying or renting the property, or where any part of the cost is passed on to residents who don't decide to separately purchase parking. Parking should only be available separately otherwise those who do not wish to drive are forced to subsidize the provision of parking for those who do. Where parking is allowed, planning conditions should strictly ensure that the full cost of provision is recouped by the sale of parking spaces not by any additional cost to the sale or rental of residential units.

8.

We support the reduction of and the introduction of greater flexibility in minimum separation distances in these guidelines. **Excessive separation distances result in lower density, force people further apart and create car dependency.** The emphasis should be on proper architectural measures to prevent poor privacy or shading rather than relying on excessive separation distances. In general, the guidelines should support street widths of a similar scale to the adjoining building heights with the inclusion of narrower lanes for short distances between buildings.

Where an obligation on the project proposer to demonstrate that separation distances are sufficient not to negatively impact on the privacy or amenity of occupiers exists, a similar obligation should exist to demonstrate that separation distances could not be further reduced without such negative impact in order to prevent the negative impacts of lower density and car dependency on the occupiers.

Given this we feel strongly that the minimum guideline should be substantially less than the current typical 16m. Late 19th and early 20th Century terraces in Cork are typically 7 meters between rear windows with a typical layout being a 7-meter road width including footpaths, 9 meter building depth and a 7 meter separation between rears. Examples include the Industry St. area, Greenmount area, Hibernian Buildings and Bell's field/Old Youghal Rd. Area examples in Limerick and Dundalk and Dun Laoghaire show even smaller separations as do workmen's cottages in Cork City such as Hogan's buildings and Madden's buildings which show a separation of under 4 meters. While a four-meter separation is clearly below what is desirable in a modern context the seven-meter separation causes few problems in practice and we would suggest a minimum guideline of 10 meters as a more realistic figure.

9.

Targets should be set to ensure local authorities to **work to "retrofit permeability"** in existing communities by opening up cul-de-sacs, removing hostile roadways dividing communities, creating strategic active travel links etc. **as well as delivering sufficient infill development** to ensure both that these existing communities achieve a sustainable density and that they become mixed use with housing and services available in all communities. Local authorities should also have an obligation to infill wide suburban and urban road corridors with an active street frontage which can act as a neighbourhood focus. Such wide suburban and urban road corridors serve to isolate the communities on either side and reduce density.

10.

Active street frontage strongly encourages people to spend time on a street while long stretches of blank walls or other “dead” frontage contribute to a feeling of unease and the perception of danger which strongly discourages active travel and community vibrancy.

11.

Minimum limits for urban densities, in both units per hectare and in FAR (floor area ratio).

12.

Maximum limits to permitted urban block sizes to ensure permeability

We have also attached as Appendix 2 an extract from the Joint PPN Environmental pillar reps submission to the 2019 Southern Regional Assembly RSES consultation for further context to the points made above in relation to a critical density and what is required to make 15 minute communities a reality

Detailed comment

Comment on each of the Draft National Policy Objectives,

National Policy Objective 1

Ensure that all plans, projects and activities requiring consent arising from the National Planning Framework are subject to the relevant environmental assessment requirements including SEA, EIA, SFRA and AA as appropriate.

Support, with the addition of a Sustainable Transport Assessment aimed at ensuring that all new developments are easily accessible by all users/employees, that all residents can access the majority of everyday destinations on foot or by bike and that there is a frequent connection to the public transport network.

National Policy Objective 2

The projected level of population and employment growth in the Eastern and Midland Regional Assembly area will be at least matched by that of the Northern and Western and Southern Regional Assembly areas combined.

Support.

National Policy Objective 3

Eastern and Midland Region: 470,000 additional people between 2022 and 2040 (c. 690,000 additional people over 2016-2040) i.e. a population of almost 3 million;

Northern and Western Region: 150,000 additional people between 2022 and 2040 (c. 210,000 additional people over 2016-2040) i.e. a population of just over 1 million;

Southern Region: 330,000 additional people over 2022 levels (c. 450,000 additional people over 2016-2040) i.e. a population of just over 2 million.

Significant revision upwards and rebalancing required.

We are extremely concerned that these targets amounting to a 53,000 increase per year nationally are significantly below the 67,000 per year increase in population we have seen over the past 6 years. This runs the risk of resulting in a very significant under provision of housing and infrastructure over the period of the framework. This is a particularly pertinent risk given the current very significant deficits in the provision of housing and infrastructure which exist, due to, amongst other reasons, previous plans that significantly underestimated the level of population growth.

We feel most strongly that these figures **should be revised upwards at an absolute minimum reflect the level of growth which has occurred in the recent past**, and ideally to allow a reasonable buffer beyond that.

We also feel that the balance of the figures between the regions needs to be considered together with the targets for major urban areas in objective 16 on the table 4.1. We are extremely concerned at the high levels of growth outside the major urban areas. While we support

- 1 The maintaining rural population,
- 2 The rapid growth of smaller urban population centers such as Sligo, Tralee, Athlone, Kilkenny ect. Outside the commuter zone of the major Urban areas.
- 3 The rebalancing of growth away from Dublin.
- 4 Infill of existing large commuter towns to provide viable community services, a dense urban core, and a viable local economy.

We object most strongly to

- 1 Further growth of the exurban population in “rural” areas and small settlements.
- 2 Housing growth in commuter towns other than infill to achieve viable urban population densities and economic critical mass.

The level of growth outside the major urban centers cannot conceivably be absorbed by either these smaller regional urban centers or by truly rural areas and can only be achieved by a significant growth in the exurban or commuter town commuting population which is absolutely incompatible with the overall objectives of the planning framework, sustainable growth, or the state's ability to provide sustainable transport infrastructure into the future.

National Policy Objective 4

A target of half (50%) of future population and employment growth will be focused in the existing five cities and their suburbs.

Significant revision upwards required.

As stated above Objective 3

While we support

- 1 The maintaining rural population,
- 2 The rapid growth of smaller urban population centers such as Sligo, Tralee, Athlone, Kilkenny ect. Outside the commuter zone of the major Urban areas.
- 3 The rebalancing of growth away from Dublin.
- 4 Infill existing large commuter towns to provide viable community services, a dense urban core, and a viable local economy.

We object most strongly to

- 1 Further growth of the exurban population in “rural” areas and small settlements.
- 2 Housing growth in commuter towns other than infill to achieve viable urban population densities and economic critical mass.

The target of 50% of growth outside the existing five cities cannot conceivably be absorbed by either these smaller regional urban centers or by truly rural areas and can only be achieved by a significant growth in the exurban or commuter town commuting population which is absolutely incompatible with the overall objectives of the planning framework, sustainable growth, or the state's ability to provide sustainable transport infrastructure into the future.

It must be remembered that the Metropolitan Dublin is responsible for 53% of national economic output, Metropolitan Cork 27%, the remaining 20% of national output is not further broken down between the other 3 cities and the rest of the country, but the share of economic activity taking place outside the 5 main cities is certainly not more than 10%. This makes clear 3 things

1. The case for a rebalancing growth away from Dublin.
2. Cork is the only significant counterweight to Dublin.
3. Attempting to locate 50% of national population growth in an area responsible for only 10% of National economic output will result in wholesale long distance commuting rather than a sustainable or achievable rebalance.

We recommend most strongly that

1. The target of 50% be raised to 75%
2. That the 25% of growth outside the existing five cities be strongly focussed in regional centers which do not have any significant commuter flow to any of the existing five cities. With the aim of achieving a scale which can develop self-sustaining local economic activity.
3. That Cork be a designated development priority as a counterweight to Dublin.
4. Galway, Limerick, and Waterford are designated development priorities with the aim of achieving the scale which has been achieved in Cork.
5. The reprioritisation of development away from Dublin does not limit housing availability in the capital.
6. That the housing and population growth in Dublin and other metropolitan centers is sufficiently greater than employment growth to ensure that the number of those commuting long-distance into these centers to work reduces dramatically.

National Policy Objective 5

The regional roles of Athlone in the Midlands, Sligo and Letterkenny in the North-West and the Letterkenny-Derry and Drogheda-Dundalk-Newry cross-border networks will be supported in the relevant Regional Spatial and Economic Strategy and in Regional Enterprise Plans.

Support.

National Policy Objective 6

Accessibility from the north-west of Ireland and between centres of scale separate from Dublin will be significantly improved, focused on cities and larger regionally distributed centres and on key east-west and north-south routes.

Strongly supported.

National Policy Objective 7

Deliver at least 40% of all new homes nationally, within the built-up footprint of existing settlements and ensure compact and sequential patterns of growth.

Significant revision upwards required.

The extremely low density of our existing urban settlements is such that even if a 100% of new development was to occur within the existing urban footprint it would not be sufficient to achieve viable urban densities required to allow walkable communities capable of supporting all everyday services within walking distance.

It is critical that as much development as possible take place within the existing footprint. Not only so that new development is more centrally located but also to provide density within existing communities to allow the provision of services within those communities.

We recognize that mandating a 100% of development within the existing footprint is unreasonable, because of

- 1 Special circumstances which may exist
- 2 Infill may take more time to deliver
- 3 We require a rapid expansion in the housing stock and any constraints must not slow the supply

We would strongly suggest that this target is increased to 80%. In addition, local authorities are required to identify sites to accommodate at least 100% of the growth target within the existing urban footprint to allow for the reality that not all sites will be developed within the time frame of this planning framework and ensure a reasonable over provision of sites to reflect this.

National Policy Objective 8

Deliver at least half (50%) of all new homes that are targeted in the five Cities and suburbs of Dublin, Cork, Limerick, Galway and Waterford, within their existing built-up footprints.

Significant revision upwards required.

As above see objective 7

Local authorities are required to identify sites to accommodate at least 120% of the growth target within the existing urban footprint to allow for the reality that not all sites will be developed within the time frame of this planning framework and ensure a reasonable over provision of sites to reflect this.

National Policy Objective 9

Deliver at least 30% of all new homes that are targeted in settlements other than the five Cities and their suburbs, within their existing built-up footprints.

Significant revision upwards required.

As above see objective 7

National Policy Objective 10

Deliver Transport Orientated Development (TOD) at scale at suitable locations, served by high capacity public transport and located within or adjacent to the built up area of the five cities or a metropolitan town.

Strongly supported.

National Policy Objective 11

Planned growth at a settlement level shall be determined at the development plan-making stage and addressed within the objectives of the plan. The consideration of individual development proposals on zoned and serviced development land subject to consenting processes under the Planning and Development Act shall have regard to a broader set of considerations beyond the targets including, in particular, the receiving capacity of the environment.

To achieve the compact growth which is a central objective of the NPF it is vital that the focus of the Irish planning system from one of preventing over development to one of preventing the under development of urban areas, aimed at ensuring that all new developments are more easily accessible on foot by bike or by public transport than by private motor vehicle. That strict limits are put in place to ensure all development is proximate to a town centre or public transport hub with sufficient density and permeability to allow all everyday journeys to be easily carried out within that community on foot or by bike with frequent accessible public transport with and between these communities.

We need to

1 Move from density maximums specifying the maximum number of units per area to density minimums specifying the maximum number of units per area.

2 From limiting development to reflect the capacity of the road network to absorb the motor vehicle traffic generated to limiting the parking and motor vehicle access to new development to ensure that developments do not generate additional motor traffic.

3 From limiting development to reflect the existing capacity of local services to ensuring development has sufficient density and permeability to support local services within walking distance.

National Policy Objective 12

Ensure the creation of attractive, liveable, well designed, high quality urban places that are home to diverse and integrated communities that enjoy a high quality of life and well-being.

Strongly supported.

National Policy Objective 13

Develop cities and towns of sufficient scale and quality to compete internationally and to be drivers of national and regional growth, investment and prosperity.

Strongly supported.

National Policy Objective 14

Regenerate and rejuvenate cities, towns and villages of all types and scale as environmental assets that can accommodate changing roles and functions, increased residential population and employment activity, enhanced levels of amenity and design and placemaking quality, in order to sustainably influence and support their surrounding area to ensure progress toward national achievement of the UN Sustainable Development Goals.

We strongly support this vision for all urban areas, we have, however, some misgiving about the lack of distinction between organic and viable settlements of all sizes where the community can live, work, access services of appropriate scale and socialise within the community, and dormitory communities where the significant population commute out for work, education, local services and social connections. The role of dormitory community is a role that is incompatible with a sustainable, healthy, and economically competitive future.

National Policy Objective 15

Apply a tailored approach to urban development, linked to the Rural and Urban Regeneration and Development Funds, with a particular focus on:

Dublin;

The four Cities of Cork, Limerick, Galway and Waterford;

Strongly supported.

Strengthening Ireland's overall urban structure, particularly in the Northern and Western and Midland Regions, to include the regional centres of Sligo and Letterkenny in the North-West, Athlone in the Midlands and cross-border networks focused on the Letterkenny-Derry North-West City Region and Drogheda-Dundalk-Newry on the Dublin-Belfast corridor;

We strongly support the rapid growth of smaller urban population centers outside the commuter zone of the 5 major Cities. We understand and appreciate that the scale and connectivity of Drogheda-Dundalk-Newry on the Dublin-Belfast corridor may represent a special case where commuter towns can grow while transitioning away from commuting.

Encouraging population growth in strong employment and service centres of all sizes, supported by employment growth;

Reversing the stagnation or decline of many smaller urban centres, by identifying and establishing new roles and functions and enhancement of local infrastructure and amenities;

Support with reservations about ensuring there is no new dormitory development.

Addressing the legacy of rapid unplanned growth, by facilitating amenities and services catch-up, jobs and/or improved sustainable transport links to the cities, together with a slower rate of population growth in recently expanded commuter settlements of all sizes;

In more self-contained settlements of all sizes, supporting a continuation of balanced population and employment growth.

We strongly support the intent of this objective but believe a rewording is necessary to reflect the overriding objective of ensuring there is no new dormitory development or commuting. And that housing growth in commuter towns other than infill to achieve viable urban population densities and economic critical mass.

The framework must also strive to ensure that the substantial existing population of unwilling commuters who wish to obtain housing within their original communities in the 5 major cities close to their workplace and often friends, family and community, be able to return there. That no other people be forced out of the cities to commute long distances.

This will result in a significant shrinking of the resident population in the commuter belt without a reduction in the economic base or the population economically or socially active in these areas. It must also be recognized that housing in the commuter belt is at present primarily occupied by young families and as these families age and move out the population within those existing housing units will rapidly shrink, as has happened with the established suburbs in the 5 major cities over the last 30 years. No effort should be made to maintain the population level by building new community housing. Rather only town centre infill sufficient to provide for those living, working, and socializing within these towns part of a viable organic community should be provided.

The transition to a more balanced, self-sustaining, and viable communities and economy within the commuter belt will require development of town centre infill rather than simply an overall increase in population.

National Policy Objective 16

To ensure that the targeted pattern of population growth of Ireland's cities to 2040 is in accordance with the targets set out in Table 4.1.

We believe that table 4.1 needs to be very significantly altered

We believe that the targets as they currently are will result in

1. the continued and accelerated lack of provision of the required housing in the center of the existing cities
2. Will perpetuate the forced exile of many of those who grow up within our existing cities to distant commuter about towns far from employment families of the communities these people grew up in
3. It will exacerbate rather than help to resolve our challenges in achieving carbon neutral, sustainable, and healthy transport solutions
4. Will significantly hinder our economic competitiveness.

The past 30 years has seen significant and sustained under supply of housing in our 5 major cities particularly in the city centers where the demand for housing is greatest. These city centers are also the most sustainable places to live where the population can most easily be provided with sustainable

healthy transport choices and most efficiently achieve their economic potential. This has led to an enormous undersupply of housing within our cities, particularly in the city center areas, which is forcing people out of the cities to long commutes or emigration damaging our economic potential. As well as having a damaging effect on our health and environment.

It is vital that the framework ensure that there is a sufficient supply of housing and infrastructure in our city centers to meet and exceed future demand as well as to meet the backlog of provision which presently exists.

As we stated above Objective 4

The target of 50% of growth outside the existing five cities cannot conceivably be absorbed by either these smaller regional urban centers or by truly rural areas and can only be achieved by a significant growth in the exurban or commuter town commuting population which is absolutely incompatible with the overall objectives of the planning framework, sustainable growth, or the state's ability to provide sustainable transport infrastructure into the future.

It must be remembered that the Metropolitan Dublin is responsible for 53% of national economic output, Metropolitan Cork 27%, the remaining 20% of national output is not further broken down between the other 3 cities and the rest of the country, but the share of economic activity taking place outside the 5 main cities is certainly not more than 10%. This makes clear 3 things

1. The case for a rebalancing growth away from Dublin.
2. Cork is the only significant counterweight to Dublin.
3. Attempting to locate 50% of national population growth in an area responsible for only 10% of National economic output will result in wholesale long distance commuting rather than a sustainable or achievable rebalance.

We recommend most strongly that

1. The target of 50% be raised to 75%
2. That the 25% of growth outside the existing five cities be strongly focussed in regional centers which do not have any significant commuter flow to any of the existing five cities. With the aim of achieving a scale which can develop self-sustaining local economic activity.
3. Cork will be a designated development priority as a counterweight to Dublin.
4. Galway, Limerick, and Waterford will be designated development priorities with the aim of achieving the scale which has been achieved in Cork.
5. The reprioritisation of development away from Dublin does not limit housing availability in the capital.
6. That the housing and population growth in Dublin and other metropolitan centers is sufficiently greater than employment growth to ensure that the number of those commuting into these centers to work reduces dramatically.

Before suggesting modifications to table 4.1 we must note that there has been a methodological change between the 2016 census and the 2022 census. Where figures for the metropolitan area populations were provided for the 2016 census, figures for the city and suburbs were provided in their place for the 2022 census. This has the effect of reducing the apparent scale of Dublin and Cork in comparison to the other stations due to the larger commuter belt association with those cities particularly Dublin.

We feel in many ways that this city and suburbs figure is a better metric, it better reflects the area in which the metropolitan growth should occur. But we feel reference should also still be made to an update set figure for the entire metropolitan area, which is beyond our capacity to provide.

Not acknowledging these differences can have significant impacts on the growth figures for example the 2016 metropolitan population of Cork was greater than that of Limerick, Galway, and Waterford combined, whereas the city and suburbs population of Cork is significantly less than the combined populations of Limerick, Galway and Waterford.

We would prefer to see the growth targets reflecting a percentage of the metropolitan population but that growth to occur entirely within the cities and suburbs area. Not accounting for this substantial commuter belt population which is economically, socially, and often by family links intimately connected to the urban core with which they are associated it runs the risk of not providing housing to accommodate the growth in this population which is strongly associated with that particular city.

Suggested Table 4.1

City	Population 2022	2018 NPF	Population Growth to 2040 ²⁰		Minimum Target Population 2040
			% Range 2016-2040	% Range 2022-2040	
				People	
Dublin - City and Suburbs (Metropolitan)	1,263,000 (1,800,000)	20-25%	25-30%	540,000	1,803,000 (2,340,000)
Cork - City and Suburbs (Metropolitan)	223,000 (320,000)	50-60%	60-70%	215,000	438,000 (535,000)
Limerick - City and Suburbs	102,000	50-60%	70%	70,000	172,000
Galway - City and Suburbs	86,000		70%	60,000	146,000
Waterford - City and Suburbs	60,000		70%	42,000	102,000

National Policy Objective 17

In each Regional Assembly area, settlements not identified in Policy 4 or 5 of this Framework, may be identified for significant (i.e. 30% or more above 2022 population levels) rates of population growth at regional and local planning stages, provided this is subject to:

- Agreement (regional assembly, metropolitan area and/or local authority as appropriate);
- Balance with strategies for other urban and rural areas (regional assembly, metropolitan area and/or local authority as appropriate), which means that the totality of planned population growth has to be in line with the overall growth target; and
- A coordinated strategy that ensures alignment with the delivery of investment in infrastructure and the provision of employment, together with supporting amenities and services.

Qualified Support more detail needed see comment on Appendix 2: Population and Employment in Urban Settlements, Census of Population 2022

National Policy Objective 18

Regional and Local Authorities to identify and quantify locations for strategic employment development in the cities identified in Table 4.1.

Significantly stronger and more nuanced guidance required

Compact growth can not be achieved if strategic employment centres are developed separate from urban cores and residential areas.

There needs to be a clear demarcation between

1. Activities which should properly be excluded from urban centres as either low density employment such as warehousing, most manufacturing, etc. or as “anti-social” industrial activities such as logistics, heavy industry, abattoirs, chemical plants etc.
2. Most modern employment such as office parks, retail, professional offices, retail, medical suites which should only be permitted to be located as centrally as possible in urban cores or neighbourhood centres in larger cities as part of mixed communities with accommodation, services and public transport modes all within walking distance.

The location of office and retail parks at the urban edge or “out of town” is a significant driver of car dependency and a huge impediment to international competitiveness. If even a small fraction of jobs requires a car to reach residential areas cannot be built without provision for private motor vehicles resulting in substantially higher building costs, lower densities, and poorer quality of life for everyone. Strategic employment hubs outside the urban core struggle to attract and retain high skilled mobile international talent and is currently a very significant competitive disadvantage.

Existing and new urban edge or out of town commercial and industrial zones should be easily accessible by public transport with planning conditions requiring shift patterns and public transport services to correspond and only allow low density or “anti-social” commercial and industrial activities.

While clean high employment density commercial activity should be allowed only in high density mixed commercial and residential urban cores and neighbourhood centres easily accessible by walking and cycling and well served by public transport.

National Policy Objective 19

Regional and Local Authorities to identify and quantify locations for strategic employment development, where suitable, in urban and rural areas generally.

Significantly stronger and more nuanced guidance required

As above for objective 18

National Policy Objective 20

In meeting urban development requirements, there will be a presumption in favour of development that can encourage more people and generate more jobs and activity within existing cities, towns and villages, subject to development meeting appropriate planning standards and achieving targeted growth.

Strongly supported

National Policy Objective 21

The Government will support the LDA, in association with Local Authorities, to fulfill its statutory mandate to deliver a significant number of homes on State lands in major mixed tenure

developments, with a particular focus on brownfield and infill urban sites in the five main cities and regional centres as a priority.

Strongly supported

National Policy Objective 22

In urban areas, planning and related standards, including in particular building height and car parking, will be based on performance criteria that seek to achieve well-designed high quality outcomes in order to achieve targeted growth.

Significant revision required.

The focus of the Irish planning system needs to be transformed from one of preventing over development to one of ensuring development takes place at as high a density as is possible while still ensuring sufficient living, recreational, natural, and open space along with light and air.

We need to change from a mindset where planners reduce the number of units or height of a development to prevent over development to one where planners increase the minimum number of units or height of a development to ensure that there is a sufficient population within a development to support all the service within walking distance and enough people in close proximity to ensure a vibrant community. Good design or high quality is never achieved by simply reducing the height or number of units in a development; rather it requires that developers clearly know what is required before the beginning of the design process.

In general, no new parking should be allowed in urban areas, development which requires parking is by definition inappropriately located. While limited disabled parking, loading bays, taxi ranks etc. are required any further parking be strictly limited if allowed at all.

Car parking should not be allowed as part of residential developments except for disability access deliveries or to be sold separately only where demand ensures but the market price of the car parking space exceeds the gross costs including land and missed opportunity costs of building such parking.

It should not be possible to build any housing where the cost of providing parking is included in the cost of building, buying or renting the property, or where any part of the cost is passed on to residents who don't decide to separately purchase parking. Parking should only be available separately otherwise those who do not wish to drive are forced to subsidize the provision of parking for those who do. Where parking is allowed, planning conditions should strictly ensure that the full cost of provision is recouped by the sale of parking spaces not by any additional cost to the sale or rental of residential units.

National Policy Objective 23

Protect and promote the sense of place and culture and the quality, character and distinctiveness of the Irish rural landscape including island communities that make Ireland's rural areas authentic and attractive as places to live, work and visit. Any successor policy documents relating to national policy for rural areas and the islands will ensure continued alignment and consistency with the National Policy Objectives of this Framework.

Support

National Policy Objective 24

Support the sustainable development of rural areas by encouraging growth and arresting decline in areas that have experienced low population growth or decline in recent decades and by managing the growth of areas that are under strong urban influence to avoid over-development, while sustaining vibrant rural communities.

Support

Possible rewording required, to strengthen the differentiation between genuine rural areas and the exurban areas with strong urban influence. The most socially, economically and environmentally unsustainable type of development is scattered exurban housing and employment within originally rural communities. This weakens the previously rural communities through increased traffic isolating people in their homes, lack of social cohesion, and by increased car dependence and familiarity with distant urban centres leading to the decline of local services. It weakens the associated urban area through a daily influx of cars which takes significantly most space and investment to move and park than simply housing the commuters in the urban core

National Policy Objective 25

Target the reversal of rural decline in the core of small towns and villages through sustainable targeted measures that address vacant premises and deliver sustainable reuse and regeneration outcomes.

Strongly supported

National Policy Objective 26

Enhance, integrate and protect the special physical, environmental, economic and cultural value of built heritage assets, including streetscapes, vernacular dwellings and other historic buildings and monuments, through appropriate and sensitive investment and conservation.

Support

National Policy Objective 27

Continue to support the proportionate growth of and appropriately designed development in rural towns that will contribute to their regeneration and renewal, including interventions in the public realm, the provision of amenities, the acquisition of sites and the provision of services.

Strongly supported

National Policy Objective 28

Continue to support programmes for ‘new homes in small towns and villages’ with local authorities, public infrastructure agencies such as Uisce Éireann and local communities to provide serviced sites with appropriate infrastructure to attract people to build their own homes and live in small towns and villages.

Support

National Policy Objective 29

Ensure, in providing for the development of rural housing, that a distinction is made between areas under urban influence, i.e. within the commuter catchment of cities and large towns and centres of employment, and elsewhere:

In rural areas under urban influence, facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic or social need to live in a rural area and siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements;

In rural areas elsewhere, facilitate the provision of single housing in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.

Support

National Policy Objective 30

Project the need for single housing in the countryside through the local authority's overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes.

Support

National Policy Objective 31

Facilitate the development of the rural economy, in a manner consistent with the national climate objective, through supporting a sustainable and economically efficient agricultural and food sector, together with forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting biodiversity and the natural landscape and built heritage which are vital to rural tourism.

Support

National Policy Objective 32

Support and facilitate delivery of the National Broadband Plan as a means of developing further opportunities for enterprise, employment, education, innovation and skills development for those who live and work in rural areas.

Support

National Policy Objective 33

Enhance the competitiveness of rural areas by supporting innovation in rural economic development and enterprise through the diversification of the rural economy into new sectors and services, including ICT-based industries and those addressing climate change and sustainability.

More careful wording is required. We support enhancing the competitiveness of rural areas, however we are concerned this may be a loophole which may allow office parks in remote locations and act as a driver of long distance commuting.

National Policy Objective 34

Support the agri-food industry in promoting Ireland's continued food security in a manner that ensures economic, environmental, and social sustainability while ensuring progress in achieving targets in the National Climate Action Plan and the River Basin Management Plan.

Support

National Policy Objective 35

Continue to facilitate tourism development and in particular the Strategy for the Future Development of National and Regional Greenways, and a Blueways and Peatways Strategy, which prioritises projects on the basis of their environmental sustainability, achieving maximum impact and connectivity at national and regional level while ensuring their development is compliant with the National Biodiversity Action Plan, the national climate change objective and requirements for environmental assessments.

Strongly supported

We recognise that the provision of Greenways by reducing the volume of motor traffic is an important contributor to reducing the need for road widening and new road development. As a result, Greenways are a key strategy to reduce our impact on nature, biodiversity, and landscape.

However, to further mitigate the impact on nature, biodiversity, and landscape we would ask that care and consideration be given to minimizing the impact of the construction on the Greenway on nature. In particular, that the removal of scrub, hedgerows and trees should be kept to a minimum. We would ask that care and consideration be given to minimizing the impact of the construction of the Greenway. That minimising the removal of scrub, hedgerows and trees be a key part of the proper planning of the construction phase. While a certain amount of removal of vegetation may be required particularly where scrub, hedges, or trees cross the proposed alignment, our experience is that the vast majority of removal of vegetation occurs not on the permanent alignment but rather to facilitate the access of construction vehicles and the parking associated with construction.

We would particularly ask that steps and guidelines are provided to minimize this impact. Where removal of some vegetation is unavoidable that remediation is carried out with planting as near as possible to the site of removal.

While not central to route selection we suggest that these factors are borne in mind at the route selection stage with a view to avoiding future issues. In particular route selection for peatways should ensure routing does not require drainage or impact on rewetting high carbon soils.

National Policy Objective 36

The Department of Rural and Community Development, the Department of Agriculture, Food and the Marine, and other relevant Departments and Agencies will continue to invest in rural Ireland, including through the Rural Regeneration and Development Fund, and will work together to establish a mechanism to coordinate structures for funding rural development to align with other national strategies.

Support

Better public participation engagement and involvement of communities can lead to better design outcomes.

National Policy Objective 37

Support the objectives of public health policy including the Healthy Ireland Framework and the National Physical Activity Plan, though integrating such policies, where appropriate and at the applicable scale, with planning policy.

Strongly supported

National Policy Objective 38

Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages.

Strongly supported

National Policy Objective 39

Plan for a more diverse and socially inclusive society that targets equality of opportunity and a better quality of life for all citizens, through improved integration and greater accessibility in the delivery of sustainable communities and the provision of associated services.

Support

National Policy Objective 40

Support the implementation of language plans in Gaeltacht Language Planning Areas, Gaeltacht Service Towns and Irish Language Networks.

Support

National Policy Objective 41

Local planning, housing, health facilities and services, transport/ accessibility and leisure policies will be developed with a focus on meeting the needs and opportunities of an ageing population along with the inclusion of specific projections, supported by clear proposals in respect of ageing communities as part of the core strategy of city and county development plans.

Support

National Policy Objective 42

Prioritise the alignment of targeted and planned population and employment growth with investment in:

A childcare/ECCE planning function, for monitoring, analysis and forecasting of investment needs, including identification of regional priorities;

The provision and timely delivery of childcare facilities and new and refurbished schools on well-located sites within or close to existing built-up areas, including in support of infill and brownfield development, that meet the diverse needs of local populations and act as a key enabler for housing development, thereby contributing to the development of sustainable communities;

The expansion and consolidation of Further and Higher Education facilities, particularly where this will contribute to wider regional development, and

Programmes for life-long learning, especially in areas of higher education and further education and training where skills gaps are identified.

Support

National Policy Objective 43

To target the delivery of housing to accommodate approximately 50,000 additional households per annum by 2040.

Significant revision upwards required.

This target is sufficient only to meet the housing needs of project population increases. Any house building target need to also meet the housing need resulting from

1. Pent up demand from the existing under provision of housing among
 - A. Those currently homeless and living in emergency accommodation direct provision etc.
 - B. Those currently homeless but who don't qualify or don't avail of emergency accommodation primarily due to higher incomes and are living in Airbnb's, hotels, hostels and couch surfing with friends, as well as a substantial number of workers living in temporary accommodation provided by employers.
 - C. Those currently in over crowded house shares.
 - D. Those currently living with parents or other relatives (including those who have experienced relationship break ups but are forced to continue cohabiting) long beyond when they desire.
 - E. Those currently unwillingly commuting long distances from remote areas who urgently need accommodation in urban centres who's current accommodation was previously and in the future revert to use as holiday homes or seasonal rentals
 - F. Those who have unwillingly emigrated due to lack of accommodation and who return in the event of the availability of accommodation will be above and beyond the otherwise expected level of net immigration
2. The pent up natural turnover of older buildings which are obsolete, unsound, or otherwise require demolition.
3. The ongoing decrease in average household size

This runs the risk of resulting in a very significant under provision of housing over the period of the framework. This is a particularly pertinent risk given the current very significant deficits in the provision of housing which currently exist, due to, amongst other reasons, previous plans very significantly underestimating the level of population growth.

We feel most strongly that these figures **should be revised upwards at an absolute minimum reflect pent up demand due to undersupply in the recent past**, and ideally to allow a reasonable buffer beyond that.

A target of 100,000 per year would take a minimum 5 years to clear the low estimate of the 250,000 units currently required above current provision before any of the other factors could begin to be addressed.

National Policy Objective 44

Prioritise the provision of new homes at locations that can support sustainable development and at an appropriate scale of provision relative to location.

Strongly supported.

More nuanced guidance required.

When looking at appropriate scale and location for residential development factors considered should include ensuring the density of development allows a sufficiently large population within walking distance and support local services and employment and ensuring that the scale of residential development does not outstrip the local employment demand. A key objective should be that no residential development dependent on long distance commuting is built.

When looking at the availability of local services, employment, and community infrastructure walking and cycling should be the primary consideration along with public transport. Services or employment only realistically accessible by private motor vehicles should in all cases be considered inaccessible.

National Policy Objective 45

Support the provision of lifetime adaptable homes that can accommodate the changing needs of a household over time.

Support - Building adaptability should accommodate more than just changing family composition e.g. offices able to convert to homes & vice versa as well as community facilities. Community facilities should be multi-purpose hubs rather than simply stand alone for specific purposes e.g. arts centres/ museums etc.

National Policy Objective 46

Increase residential density in settlements, through a range of measures including reductions in vacancy, re-use of existing buildings, infill development schemes, area or site-based regeneration, increased building height and more compact forms of development.

Strongly supported.

This requires implementing a number of policies in combination. These measures should include a requirement to achieve specific measurable outcomes. Such measures have a cumulative, synergistic, and multiplicative effect, while these measures are generally useful and warranted in isolation they will be vastly more effective in combination with the weakest link in the interaction between proximity(density/permeability), comfort/safety(appropriate infrastructure), and incentives having the most influence.

These measures should at minimum meaningfully address each of the following issues.

- Minimising the street area dedicated to traffic..
- A combined standard for density and permeability which specifies minimum targets for the number of people to be within walking distance of developments.
- Minimum limits for urban densities, in both units per hectare and in FAR (floor area ratio).
- Minimum permitted urban block sizes to ensure permeability
- An obligation on local authorities to work to “retrofit permeability” in existing communities by opening up cul de sacs, removing hostile roadways dividing communities, creating strategic active travel links etc.
- A national standard for minimum number of stories to be achieved in suburban, urban and town centre developments.
- Planning regulations to ensure active street frontage rather than either blank walls or a frontage set back behind parking or front gardens.
- Limiting parking through planning restrictions, parking levies, banning free parking and the construction or sale of parking as part of residential, office or retail units.
- The provision of safe, direct, and attractive cycle & walking routes as part of all new developments.
- Parking maximums.
- An obligation on local authorities to infill low density suburbs and wide road corridors.
- An obligation to provide usable and appropriate levels of green and blue spaces for people and to support biodiversity.
- Reduce light pollution, Light pollution is a serious issue affecting human health, nature and the visibility of the night sky Street lighting and the lights on motor vehicles are a major contributor

to light pollution. To mitigate the impact of light pollution we would like the following measures to be considered.

- A · That lighting only be used when and where it is required.
- B · That timers and sensors be used to ensure illumination is activated only when necessary.
- C · That appropriate cowlings are used to direct light only where needed.
- D · That the use of non-reflective or directionally reflective surfaces are considered to minimize the escape of light from where it is most needed.
- E · That the wavelength or colour temperature of the light is as red or of as long a wavelength as is practical as these frequencies both have less of a physiological impact on humans and the natural world and also are more rapidly attenuated within the atmosphere

National Policy Objective 47

Continue to develop methodologies and data sources to improve the evidence base, effectiveness and consistency of the planning process for housing provision at regional, metropolitan and local authority levels. This will include standardised requirements for the recording of planning and housing data by the local authorities in order to provide a consistent and robust evidence base for housing policy formulation.

Strongly supported.

National Policy Objective 48

A 'Housing Need Demand Assessments' (HNDAs) undertaken for each Local Authority Area in order to correlate and accurately align future housing requirements:

Strongly supported.

This requires not only assessing the housing needs of project population increases. Any house needs assessment need to also assess the housing need resulting from

4. Pent up demand from the existing under provision of housing among
 - G. Those currently homeless and living in emergency accommodation direct provision etc.
 - H. Those currently homeless but who don't qualify or don't avail of emergency accommodation primarily due to higher incomes and are living in Airbnb's, hotels, hostels and couch surfing with friends, as well as a substantial number of workers living in temporary accommodation provided by employers.
 - I. Those currently in overcrowded house shares.
 - J. Those currently living with parents or other relatives (including those who have experienced relationship break ups but are forced to continue cohabiting) long beyond when they desire.
 - K. Those currently unwillingly commuting long distances from remote areas who urgently need accommodation in urban centres whose current accommodation was previously and in the future revert to use as holiday homes or seasonal rentals
 - L. Those who have unwillingly emigrated due to lack of accommodation and who return in the event of the availability of accommodation will be above and beyond the otherwise expected level of net immigration
5. The pent-up natural turnover of older buildings which are obsolete, unsound, or otherwise require demolition.

6. The ongoing decrease in average household size

We feel most strongly that any effective housing needs assessment should allow a reasonable buffer beyond expected demand to reflect the reality that not all sites identified will be developed within the time frame of this planning framework and ensure a reasonable over provision of sites to reflect this.

National Policy Objective 49

Regional, metropolitan and local development plans will take account of and integrate relevant maritime spatial planning issues.

Support

National Policy Objective 50

Support the sustainable growth and development of the maritime economy and continue to invest in the seafood sector and our Fishery Harbour Centres, particularly in remote rural coastal communities and islands.

Support Subject to implementation the Marine Protected Area legislation.

National Policy Objective 51

Ensure that the strategic development requirements of Tier 1 and Tier 2 Ports, ports of regional significance, State Fishing Harbours and smaller harbours are addressed as part of Regional Spatial and Economic Strategies, and plans at local level to ensure the effective growth and sustainable development of the city regions and regional and rural areas, including, where appropriate, infrastructure to effectively support the development and maintenance of off-shore renewable electricity generating developments.

Support

We believe that Tier 1 and 2 ports should be developed to connect with the rail network with no nonlocal road freight generated.

National Policy Objective 52

Support the sustainable delivery of port and harbour infrastructure to facilitate the development, maintenance and operation of off-shore renewable electricity generating developments.

Strongly Support

National Policy Objective 53

Ensure that Ireland's coastal resource is managed to sustain its physical character and environmental quality.

Strongly Support

National Policy Objective 54

In line with the collective aims of national policy regarding climate adaptation, to address the effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.

Strongly Support Together with assessment of areas most at risk and a managed retreat plan developed where necessary.

National Policy Objective 55

Support the development of coastal management plans to address the likely effects of sea level changes and coastal flooding and erosion and to support the implementation of adaptation responses in vulnerable areas.

Support

National Policy Objective 56

To support, the progressive development of Ireland's offshore renewable energy potential, the sustainable development of enabling onshore infrastructure including domestic and international grid connectivity enhancements, non-grid transmission infrastructure, as well as port infrastructure for the marshalling and assembly of wind turbine components and for the operation and maintenance of offshore renewable energy projects.

Support

National Policy Objective 57

Work with the relevant Departments in Northern Ireland for mutual advantage in areas such as spatial planning, development and promotion of the all-island economy, coordination of social and physical infrastructure provision and environmental protection and management.

Support

National Policy Objective 58

In cooperation with relevant Departments and Local Authorities in Northern Ireland, to further support and develop the economic potential of the Dublin-Belfast Corridor and in particular the core Drogheda-Dundalk-Newry network and to promote and enhance its international visibility.

Support

National Policy Objective 59

In cooperation with relevant Departments and Local Authorities in Northern Ireland, support and promote the development of the North West City Region as interlinked areas of strategic importance in the North-West of Ireland, through collaborative structures and a joined-up approach to spatial planning.

Support

National Policy Objective 60

Support cross border cooperation and funding for health and education services and facilities.

Support

National Policy Objective 61

In cooperation with relevant Departments in Northern Ireland, enhanced sustainable transport connectivity between Ireland and Northern Ireland, to include cross-border road and rail, electric vehicle infrastructure, cycling and walking routes, as well as blueways, greenways and peatways.

Support

National Policy Objective 62

In cooperation with relevant Departments in Northern Ireland, strengthen all-island energy infrastructure and interconnection capacity, including distribution and transmission networks to enhance security of electricity supply, and explore the potential for strategic cooperation on offshore wind energy development.

Support

National Policy Objective 63

In cooperation with relevant Departments in Northern Ireland, develop a stable, innovative and secure digital communications and services infrastructure on an all-island basis.

Support

National Policy Objective 64

Support the coordination and promotion of all-island tourism initiatives through continued co-operation between the relevant tourism agencies and Tourism Ireland, pursue the further development of sport, and invest in the diverse heritage, arts and cultural and linguistic traditions of the island.

Support

National Policy Objective 65

In cooperation with relevant Departments in Northern Ireland, ensuring effective management of shared landscapes, heritage, water catchments, habitats, species and trans-boundary issues in relation to environmental policy.

Support

National Policy Objective 66

In cooperation with the United Kingdom Government and devolved Governments of Northern Ireland, Scotland and Wales, Ireland will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning and other related spheres.

Support

National Policy Objective 67

The planning system will be responsive to our national environmental challenges and ensure that development occurs within environmental limits, having regard to the medium and longer-term requirements of all relevant environmental and climate legislation and the sustainable management of our natural capital.

Strongly Support

National Policy Objective 68

Support the circular and bio economy including in particular through greater efficiency in land and materials management, promoting the sustainable reuse of existing buildings and structures while conserving cultural and natural heritage, the greater use of renewable resources and by reducing the rate of land use change from urban sprawl and new development.

Strongly Support -**Land use efficiency requires**

- Minimising the street area dedicated to traffic.
- A combined standard for density and permeability which specifies minimum targets for the number of people to be within walking distance of developments.
- Minimum limits for urban densities, in both units per hectare and in FAR (floor area ratio).
- Minimum permitted urban block sizes to ensure permeability
- An obligation on local authorities to work to “retrofit permeability” in existing communities by opening up cul de sacs, removing hostile roadways dividing communities, creating strategic active travel links etc.
- A national standard for minimum number of stories to be achieved in suburban, urban and town centre developments.
- The widespread public access to and use of social open space, active open space, natural open space. This will require in some cases the power to use CPO orders to ensure preserved social open space, active open space, natural open space are open to and freely used by the public and community.
- Limiting parking through planning restrictions, parking levies, banning free parking and the construction or sale of parking as part of residential, office or retail units.
- Policies to encourage or mandate meanwhile use of sites awaiting development or restoration.
- Parking maximums.
- An obligation on local authorities to infill low density suburbs and wide road corridors.

National Policy Objective 69

Support the growth and development of efficient district heating, electrification of heating, and utilisation of geothermal energy.

Support

National Policy Objective 70

Reduce our carbon footprint by integrating climate action into the planning system in support of national targets for climate policy mitigation and adaptation objectives, as well as targets for greenhouse gas emissions reductions as expressed in the most recently adopted carbon budgets.

Support

National Policy Objective 71

Promote renewable energy use and generation at appropriate locations within the built and natural environment to meet national objectives towards achieving a zero carbon economy by 2050.

Support

National Policy Objective 72

Support the development and upgrading of the national electricity grid infrastructure, including to support the delivery of renewable electricity generating development.

Support

National Policy Objective 73

Support an all-island approach to the delivery of renewable electricity through interconnection of the transmission grid.

Support

National Policy Objective 74

Support the co-location of renewable technologies with other supporting technologies and complementary land uses, including agriculture, amenity, forestry and opportunities to enhance biodiversity and promote heritage assets, at appropriate locations which are determined based upon the best available scientific evidence in line with EU and national legislative frameworks.

Support

National Policy Objective 75

Each Regional Assembly must plan, through their Regional Spatial and Economic Strategy, for the delivery of the regional renewable electricity capacity allocations indicated for onshore wind and solar reflected in Table 9.1 below, and identify allocations for each of the local authorities, based on the best available scientific evidence and in accordance with legislative requirements, in order to meet the overall national target.

Outside the scope of the TMF remit.

National Policy Objective 76

Local Authorities shall plan for the delivery of Target Power Capacity (MW) allocations consistent with the relevant Regional Spatial and Economic Strategy, through their City and County Development Plans.

Outside the scope of the TMF remit.

National Policy Objective 77

Sustainably manage waste generation including construction and demolition waste, invest in different types of waste treatment and support circular economy principles, prioritising prevention, reuse, recycling and recovery, to support a healthy environment, economy and society.

Support

National Policy Objective 78

Enhance water quality and resource management by preventing or mitigating the risk of flooding by:

Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities.

Taking account of the potential impacts of climate change on flooding and flood risk and consideration of the Flood Risk Management Climate Change Sectoral Adaptation Plan.

Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process.

Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), non-porous surfacing and green roofs, and nature based solutions, to create safe places.

Support - RBMP to be replaced by recently launched Water Action Plan. Local authorities should have the power to ban or limit impermeable surfaces such as concrete, tarmac, or astro-turf.

National Policy Objective 79 Support the management of stormwater, rainwater and surface water flood risk through the use of nature-based solutions and sustainable drainage systems.

Support

National Policy Objective 80

Support the retrofitting of existing environments to cater for surface water run-off through the use of nature based solutions, including the implementation by Uisce Éireann of Integrated Drainage Plans on a prioritised settlement basis.

Support

National Policy Objective 81

Integrated planning for Green and Blue Infrastructure will be incorporated into the preparation of statutory land use plans while maintaining ecosystem services and ecosystem functions and conserving and/or restoring biodiversity.

Support

National Policy Objective 82

Identify and strengthen the value of greenbelts and green and blue spaces at a regional, city and local scales, to enable enhanced connectivity to wider strategic networks and prevent coalescence of settlements and to allow for the long-term strategic expansion of urban areas. Promote and support an increase in the provision of green and blue spaces and tree canopy cover in settlements.

Strongly supported

We support the ample provision of open space which has a clear use, function or objective. However, a blanket definition of generic green space may be interpreted as a requirement to provide or protect any grassy area including those of no social, amenity, nature, historic, or conservation value and hence prevent infill development, lower the density of population/services/employment, increase the distances between trip generators etc. without adding significant value.

Any green or blue space must have a clear social, amenity, nature, historic, or conservation role and use space efficiently in that role. The goal should be that every urban community should have a sufficient density of

1. Housing,
2. Employment,
3. Services,
4. Social open space
5. Active open space
6. Natural open space.

This can only be achieved if the spatial efficiency of the above uses is maximised and space dedicated

1. Vacancy & dereliction
2. Motor traffic
3. Parking
4. Private spaces with a low density of habitation/employment/service user footfall

Is reduced to a minimum.

National Policy Objective 83

In line with the National Biodiversity Action Plan and the European Union Nature Restoration Law, and best available scientific information, regional and local planning authorities shall support the preparation of the National Restoration Plan.

Support

National Policy Objective 84

In line with the National Biodiversity Action Plan; the conservation, enhancement, mitigation and restoration of biodiversity is to be supported by:

Integrating policies and objectives for the protection and restoration of biodiversity, including the avoidance and/or minimisation of potential biodiversity impacts, in statutory land-use plan. Retention of existing habitats which are currently important for maintaining biodiversity (at local/regional/national/international levels), in the first instance, is preferable to replacement/restoration of habitats, in the interests of ensuring continuity of habitat provision and reduction of associated risks and costs.

Strongly Support

Light pollution is a serious issue affecting human health, nature and the visibility of the night sky. Street lighting, commercial developments, and the lights on motor vehicles are a major contributor to light pollution.

To mitigate the impact of light pollution we would like the following measures to be considered.

- That lighting only be used when and where it is required.
- That timers and sensors be used to ensure illumination is activated only when necessary.
- That appropriate cowlings are used to direct light only where needed.
- That the use of non-reflective or directionally reflective surfaces are considered to minimize the escape of light from where it is most needed.
- That the wavelength or colour temperature of the light is as red or of as long a wavelength as is practical as these frequencies both have less of a physiological impact on humans and the natural world and also are more rapidly attenuated within the atmosphere

National Policy Objective 85

In line with the objectives of the National Biodiversity Action Plan, planning authorities should seek to address no net loss of biodiversity within their plan making functions.

Support

When a development or land use is assessed for its net biodiversity impact it is critical that the transport demand of the development or land use is considered. A development close to an urban core which reduces transport demand must get credit for the reduction in biodiversity loss due to a decreased level of road expansion. Whereas, a development which will require motor vehicle access assessed the assessment must include the biodiversity loss from the resulting increase in road infrastructure required.

No net loss should be seen as a bare minimum with local authorities having the power to look for net gain and to account for a reasonable failure rate of offsetting and mitigation activities.

National Policy Objective 86

Enhance the conservation status and improve the management of protected areas and protected species by:

Implementing relevant EU Directives to protect Ireland's environment and wildlife and support the objectives of the National Biodiversity Action Plan;

Developing and utilising licensing and consent systems to facilitate sustainable activities within Natura 2000 sites;

Continued research, survey programmes and monitoring of habitats and species.

Support

National Policy Objective 87

Conserve and enhance the rich qualities of natural, cultural and built heritage of Ireland in a manner appropriate to their cultural and environmental significance.

Support

National Policy Objective 88

Facilitate landscape protection, management and change through the preparation of a National Landscape Character Map and development of guidance on local landscape character assessments, (including historic landscape characterisation) to ensure a consistent approach to landscape character assessment, particularly across planning and administrative boundaries.

Support

National Policy Objective 89

Ensure the alignment of planned growth with the efficient and sustainable use and development of water resources and water services infrastructure, in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.

Support

National Policy Objective 90

Improve air quality and help prevent people being exposed to unacceptable levels of pollution in our urban and rural areas through integrated land use and spatial planning that supports public transport, walking and cycling as more favourable modes of transport to the private car, the promotion of energy efficient buildings and homes, heating systems with zero local emissions, green and blue infrastructure planning and innovative design solutions.

Strongly supported

More detail required

Local authorities should be formally obligated to reduce and maintain air pollution levels below the level at which health impacts occur. Local authorities should be obligated to limit motor traffic, reduce speed limits and/or impose Low emission zones if there is a risk that air pollution levels will rise to a level at which health is impacted. Local authorities should also have the power to prioritise schools and public areas, hospitals and other sensitive areas with lower limits or stricter limits on polluting activities.

National Policy Objective 91

Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through Strategic Noise Maps, Noise Action Plans and national planning guidance.

Strongly supported

More detail required

Local authorities should be formally obligated to reduce and maintain traffic noise levels below the level at which health and social impacts occur. Local authorities should be obligated to limit motor traffic, reduce speed limits and/or impose Low emission zones if there is a risk that traffic noise levels will rise to a level at which health, sleep or social activities are impacted.

National Policy Objective 92

Metropolitan Area Strategic Plans for the Dublin, Cork, Limerick, Galway and Waterford Metropolitan areas and in the case of Dublin and Cork, to also address the wider city region, shall be reviewed by the appropriate authorities in tandem with and as part of a review of the relevant Regional Spatial and Economic Strategy.

Strongly supported

National Policy Objective 93

The Metropolitan Area Strategic Plans, shall include provision for large-scale Transport Orientated Development (TOD) opportunities and may target a proportion of planned growth in the metropolitan areas towards the delivery of new sustainable communities at brownfield and greenfield locations in the principal city and suburbs areas and in the wider metropolitan areas focused on opportunities arising from existing and planned major public transport investment, along planned high capacity public transport corridors and in accordance with the principles of Transport Orientated Development.

Strongly supported

We strongly support all development in metropolitan regions outside the urban cores be transit orientated development focused on high capacity high frequency public transport routes and embedded in a sustainable high density compact neighbourhood core of sufficient scale to provide local services within walking distance of all residents.

However, we are concerned about this distracting from ensuring the focus of development should always be about providing the maximum amount of housing and services in the urban core as possible. Given the low density of our existing urban cores the majority of development over the next two decades within our metropolitan areas should occur within our urban cores and in our existing inner suburban communities, in the case of Dublin already served by mass transit and with easy cycling distance of the urban core or in the case of our other cities within walking distance of those urban cores.

National Policy Objective 94

Statutory arrangements between spatial and transport planning in the Greater Dublin Area will be extended to other cities.

Strongly supported

National Policy Objective 95

The Government will work to establish the necessary institutional and funding arrangements to support the development and accelerated delivery of Transport Oriented Development at suitable locations in conjunction with the ongoing programme of investment in the public transport network.

Strongly supported

National Policy Objective 96

Provision will be made for urban area plans and priority area plans, to replace current local area plan provisions; coordinated area plans to be prepared where a town and environs lie within the combined functional area of more than one local authority, and the designation of areas with significant potential for development as Candidate Urban Development Zones and Urban Development Zones in order to facilitate focused investment in enabling infrastructure and accelerated development.

Strongly supported

National Policy Objective 97

Planning authorities will be required to apply a standardised, tiered approach to differentiate between i) zoned land that is serviced and ii) zoned land that is serviceable within the life of the plan.

Strongly supported

National Policy Objective 98

When considering zoning lands for development purposes that require investment in service infrastructure, planning authorities will make a reasonable estimate of the full cost of delivery of the specified services and prepare a report, detailing the estimated cost at draft and final plan stages.

When costing the servicing land to enable its development local authorities should differentiate between non transport infrastructure costs, the infrastructure cost of catering for motor vehicle traffic, and separately the infrastructure costs relating to sustainable development.

National Policy Objective 99

When considering zoning land for development purposes that cannot be serviced within the life of the relevant plan, such lands should not be zoned for development.

No comment

National Policy Objective 100

Planning authorities will use compulsory purchase powers to facilitate the delivery of enabling infrastructure to prioritised zoned lands, to accommodate planned growth.

Strongly supported

National Policy Objective 101

Planning authorities and infrastructure delivery agencies will focus on the timely delivery of enabling infrastructure to prioritise zoned lands in order to deliver planned growth and development.

In addition, to ensure that infill and brownfield lands are being developed and that the compact growth targets set out in NPO 7 - 9 are being achieved, it is also important to develop and implement new approaches to measuring and monitoring compact growth in cities and larger settlements, aligned to greater digitalisation of the planning system.

Strongly supported

National Policy Objective 102

Develop and implement new approaches to measuring and monitoring compact growth in cities and larger settlements aligned to increased digitalisation of the planning system.

Strongly supported

National Policy Objective 103

Continue to ensure the alignment of the National Planning Framework and the National Development Plan through delivery of the National Strategic Outcomes.

Strongly supported

We would be obliged to further partake and feed into the discussion and planning process in the next stages to come. Should you require any clarifications, please email us at tmfcork@gmail.com .

Kind regards

Dr Darren McAdam-O'Connell (Coordinator)

Transport and Mobility Forum

Note: *The comments within this submission are solely the view of the Transport and Mobility Forum (TMF) as a whole and not the opinion or view of any individual partner of the TMF.*

A full list of partners in the Transport and Mobility Forum can be found at

<https://transportandmobilityforum.com/partners/>

Appendix 1

Cork Transport and Mobility Forum Priorities to reduce Transport emissions

Priority		
1 Reduce the distance needed to reach everyday destinations.	emissions. Lighter vehicles are also safer for those around them and so reduce the “arms race effect” of ever-growing vehicle size and lower number of pedestrians & cyclists. Lower speeds require less energy to move and so less emissions. Lighter vehicles are also safer and so reduce the “arms race effect” of ever-growing vehicle size and lower number of pedestrians & cyclists. Average driving speeds are circa 25kph yet cars are optimised for speeds of circa 100kph, this requires far heavier engines and all vehicles be armoured to survive collisions with vehicles at those speeds vastly increasing the weight, cost and emissions of each vehicle. More efficient vehicles and low emission fuels such as electric emit less emissions per distance at a given weight and speed.	parking as part of residential, office or retail units. Increase public transport subvention and provision. Safe, direct, and attractive cycle & walking routes. Change vehicle standards at EU level to favour lighter vehicles. Tax heavier vehicles more highly, reduce the maximum weight limit for vehicle classes, lower speed limits for heavier vehicles, limit access for larger vehicles to urban areas. Lower speeds
2 Switch to lower energy/emission modes.		
3 Reduce size & weight of vehicles		
4 Lower the speeds		Reduce speed limits, greater speed enforcement, automatic speed logging. Change vehicle standards at EU level to ensure vehicles are optimised for speeds of no greater than 30 kph and collisions at those speeds. Reduce travel distances.
5 More efficient/lower emission power/fuel		
Why	How	
Shorter journeys equal less emissions. More trips become possible by active travel. Shorter trips allow lower speeds. Active travel is naturally zero emissions as well as having health, social and cost benefits, public transport is naturally lower emission than using individual private vehicles.	Compact mixed-use communities, waste less space on wide roads, junctions, medians, verges, and parking. Introduce density minimums. Reduce travel distances. Subsidise and encourage low emission modes tax, limit, and discourage high emission modes. Tax emissions, limit the entry of high emission vehicles to low emission zones, use road pricing to discourage private vehicles. Limit parking through planning restrictions, parking levies, banning free parking and the construction or sale of	Advance the ban on the sale of new Petrol/diesel vehicles. Increase the duty on Petrol & diesel. Fund the building of a public charging network through levies on the motor industry.
Lighter vehicles require less energy to move and so less		

Appendix 2

Extract from the Joint PPN Environmental pillar reps submission to the 2019

Southern Regional Assembly RSES consultation for further context.

There is much talk about increased density, a 5-minute Village or community concept, where most or all everyday services or destination is within easy walk.

This is a wonderful concept but unless there is some detail specified exactly what we mean by everyday services and destinations and exactly what is an easy 5-minute walk this will just be lip service. The same goes for the provision of public transport. We need sufficient density in order to be able to support a frequent affordable public transport network that does not only bring you in and out of a single destination from a residential area but links multiple accessible communities. We need to define the densities at which each improvement in public transport becomes possible otherwise it will also become something to which lip service can easily be paid without any real improvement in services being possible.

Development plans should consider the existing density of areas and specify minimum unit densities in new developments in order to reach minimum densities within the Communities to allow efficient provision of public transport and the support of services within those communities.

This requires guidance to be given on what those minimum densities required are and this requires us to examine what services should be within walking distance and how far is walking distance.

How far is an easy walk?			
	5min	10min	15min
Slow 5km/h	0.42	0.83	1.25
Brisk 7.5km/h	0.63	1.25	1.88
Fast 10km/h	0.83	1.67	2.50

What area is in easy walking distance?			
	5min	10min	15min
Slow 5km/h	0.5	2.2	4.9
Brisk 7.5km/h	1.2	4.9	11.0
Fast 10km/h	2.2	8.7	19.6

So for example we could define 3 levels of accessibility

	0.5km
An Easy 5	2
A Reasonable 10	5km ²
A Fit 15	12km ²

An easy 5-minute walk is accessible even for someone with limited mobility, a reasonable 10 for most people and a fit 15 for the young, healthy and motivated.

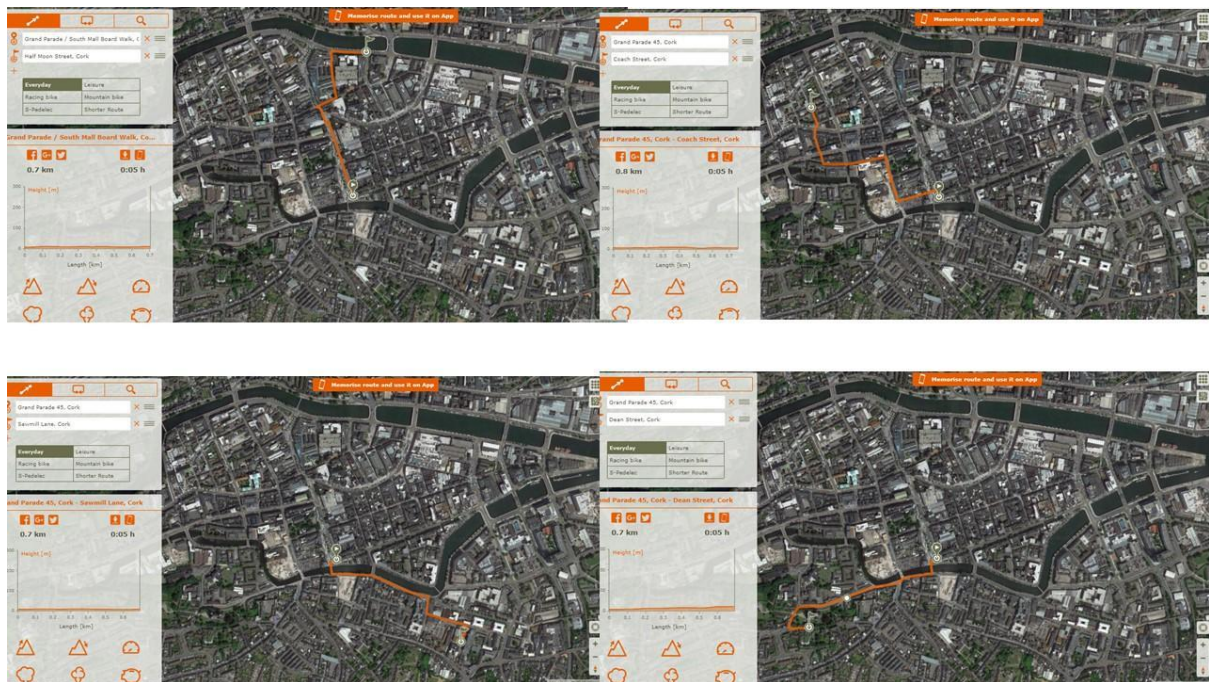
Transport & Mobility Forum

This would in theory would allow us to look at a selection of services, see how many people are required to support each of these services and therefore the density required to enable each of these services to be within either an easy 5, reasonable 10 or fit 15 of people living in communities of that density. Allowing in theory the planning of communities of appropriate density to allow the objectives outlined throughout the RSES to be achieved.

However, this assumes perfect permeability where you could walk in a straight line to anywhere within a circle of that distance of their home, the reality is even in highly permeable neighbourhoods you must follow a road or a street reducing the area easily accessed by a minimum of 50% and therefore at least doubling the minimum densities. The reality is that much Irish residential accommodation is in areas of extremely poor permeability so that the area which can be accessed by walking a given distance is reduced to only 10% or 15% of that which would be theoretically possible.

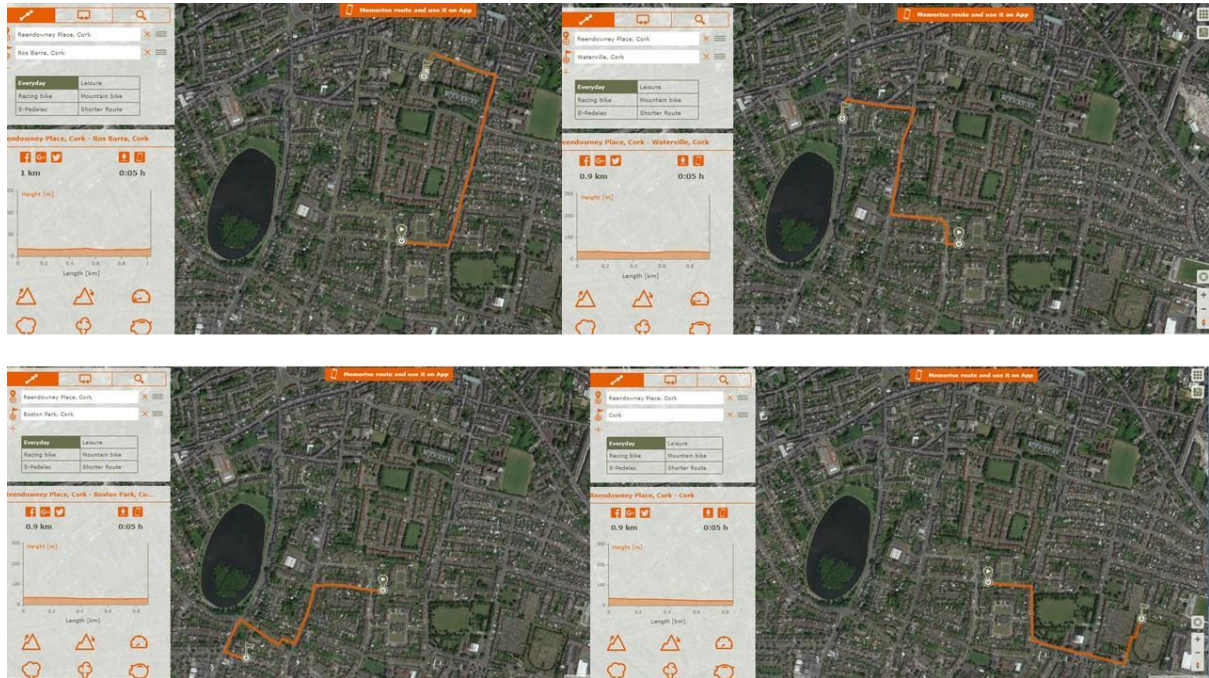
If we look at some examples of Irish communities we can see how the straight line distance relates to the actual distance required to be walked to reach local services

Example of area with close to perfect permeability average distance walked to travel 0.5km straight line distance 0.725km

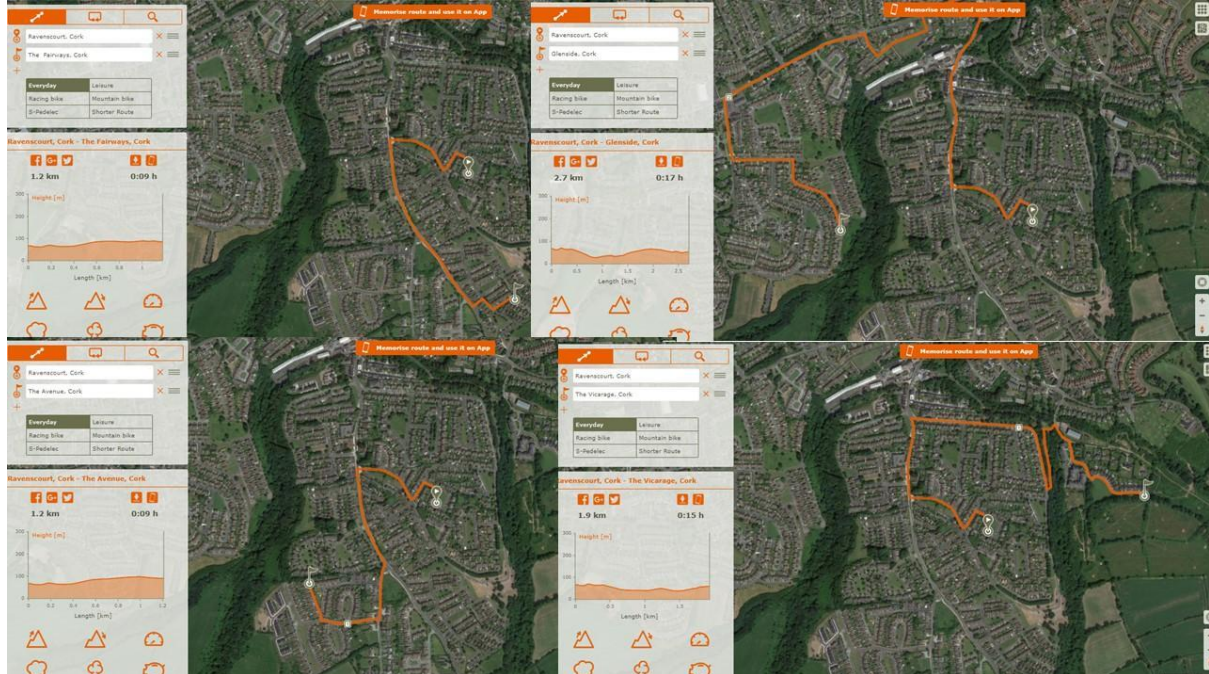


Transport & Mobility Forum

Example of area with good permeability average distance walked to travel 0.5km straight line distance 0.975km



Example of area with poor permeability average distance walked to travel 0.5km straight line distance 1.9km



Transport & Mobility Forum

This then allows us to calculate the actual area which can be accessed easily reasonably or with difficulty by foot at different levels of permeability

(All areas Km²)

What area is in easy walking distance? Excellent Permeability			
	5mi n	10mi n	15mi n
Slow 5km/h	0.27	1.5	3.4
Brisk 7.5km/h	0.6	3.4	8.8
Fast 10km/h	1.5	7.0	15.7

What area is in easy walking distance? Good Permeability			
	5mi n	10mi n	15mi n
Slow 5km/h	0.14	0.55	2.0
Brisk 7.5km/h	0.31	2.0	4.4
Fast 10km/h	0.55	3.5	11.8

What area is in easy walking distance? Reasonable Permeability			
	5mi n	10mi n	15mi n
Slow 5km/h	0.05	0.22	1.5
Brisk 7.5km/h	0.12	0.49	3.3
Fast 10km/h	0.22	2.62	9.8

What area is in easy walking distance? Poor Permeability			
	5mi n	10mi n	15mi n
Slow 5km/h	0.04	0.15	0.3
Brisk 7.5km/h	0.09	0.3	0.8
Fast 10km/h	0.15	0.6	3.9

	Theoretical	Level of Permeability			
		Perfect	Good	Reasonable	Poor
Easy 5	.5km ²	.25km ²	.15km ²	.05km ²	.04km ²
Reasonable 10	5km ²	3.5km ²	2km ²	.5km ²	.3km ²
Fit 15	12km ²	10km ²	5km ²	5km ²	3km ²

Transport & Mobility Forum

It can be seen that without good permeability the area easily accessible by foot is trivial so those with poor mobility will never be able to independently access services. Those with good mobility still have a greater area accessible with reasonable effort than is easily possible at perfect permeability. This now allows us to see the minimum density required at different permeabilities to allow various services the supported within community' by people accessing those services on foot

Service	Population required to support each service	Density required to have service with in	
		Easy 5 with good permeability	Reasonable 10 with Reasonable permeability
Hairdresser	1200	10000	5000
Restaurant	1800	12500	5000
Primary School	2000	12500	5000
Corner shop	2500	20000	5000
Pub	3000	20000	7500
GP	3000	20000	7500
Chemist	3200	25000	7500
Post office	4000	30000	10000
Mini Supermarket	5000	35000	10000
Dentist	5000	35000	10000
Butcher	5500	40000	12500
Secondary School	6600	50000	15000
Garda Station	8500	N/A	20000
Choice of Restaurant	9000	N/A	20000
Playground	10000	N/A	20000
Full Supermarket	10000	N/A	20000
Library	14000	N/A	30000
Choice of pub	15000	N/A	30000
Choice of Supermarkets	25000	N/A	50000
Swimming pool	40000	N/A	N/A

It is also very important to note that it assumes that everybody is using the local services walking or cycling to them not driving too distant services reality in most Irish residential areas is that the vast majority of services are accessed by car at distant locations so even those suburban areas which reach 5000 people per square kilometre do not contain the predicted number of hairdressers corner shops homes restaurants etc. The international experience is that there is a critical density at which a large portion of people go from accessing virtually all services at a distance by car to accessing a large number of local services by foot or by bike, that this happens at or around 10000 people per square kilometre because this is the density where allowing for good, not perfect permeability and 50% of people accessing services by foot instead of my car a neighbourhood can now support a hairdresser, restaurant, shop, etc. meaning that people no longer need to drive to excess the majority of their services and suddenly switch to accessing the majority of services by foot.

Transport & Mobility Forum

Given this evidence it needs to be clearly stated that residential areas below 10000 people per square kilometre are not urban in nature rather they are suburban car dependant by necessity, unsustainable and unhealthy while densities substantially in excess of this are required in order to fully allow people to live sort of lies which are envisaged in the document.

Development plans should require that the density and permeability of Communities is considered and appropriate targets for the unit density and permeability of new developments are set. Where the number of residents & services within 0.5, 1 and 2 km walking distance are determined as well as density and percentage permeability given by dividing the area actually within walking distance by the theoretical area.

Example Minimums would be

Urban Minimum

Density Min 10,000/km² Target 20,000/km²
 Residents within 0.5km Min 1,500 Target 3,000
 Residents within 1 km Min 3,000 Target 5,000
 Residents within 2 km Min 10,000 Target 15,000
 Percentage permeability Min 25% Target 40%

Public transport corridor

Density Min 15,000/km² Target 30,000/km²
 Residents within 0.5km Min 3,000 Target 5,000
 Residents within 1 km Min 5,000 Target 8,000
 Residents within 2 km Min 10,000 Target 15,000
 Percentage permeability Min 33% Target 50%

Central City

Density Min 20,000/km² Target 50,000/km²
 Residents within 0.5km Min 5,000 Target 8,000
 Residents within 1 km Min 10,000 Target 15,000
 Residents within 2 km Min 15,000 Target 25,000
 Percentage permeability Min 45% Target 55%

Also critical to enabling communities where active travel and public transport are the norm is that the space and resources dedicated to car parking are not excessive. To ensure this maximum parking limits within development plans should be encouraged also residential developments in designated areas should be required to ensure that parking is provided separately to the residential units and sold or rented separately. Both to allow an increased density without sacrificing gardens or green space as well as preventing homeowners or renters from being forced to pay for car parking spaces whether or not they use them rather than being free to choose if they should pay for that parking or not.