

Submission to National Planning Framework Ireland 2040 Our Plan

Chapter 1 - High Level Objectives

Incorporate the definition of sustainable development. The term is mentioned 20 times within the document without being defined. I propose including it with the list of 4 high level objectives. Perhaps include it as a quote, our intention and commitment to future generations.

The Brundtland Commission definition "Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs" will be the basis of all objectives and actions coming from this plan including plans referenced within this plan. This is our commitment to ensuring our children inherit a thriving country.

Considerations on proposed objectives: National Policy Objective 25

Facilitate the promotion and creation of sustainable community development and support community organisations in their work to provide for a more sustainable future.

This would benefit from the inclusion of a definition of sustainable community development or reference to relevant policy along the lines of objective 26. For example the following quote is taken from **Our Communities: A Framework Policy for Local and Community Development in Ireland (2015)** "Based on a set of core values covering social inclusion, equality and respect for diversity, local and community development seeks to harness all the potential resources at the disposal of communities by bringing together people, groups, and agencies, voluntary and statutory bodies to make a positive difference in the development of sustainable communities. The notion of 'working with' rather than 'on' or 'for' people is central to progressive and proactive processes that seeks specific results in terms of desired changes in individuals, groups, neighbourhoods and social and economic conditions."

National Policy Objective 31

Facilitate fostering and protecting the Irish language, particularly within Gaeltacht regions.

If we can specify protection of our language surely we can do likewise with our natural environment. There are references to the natural landscape and biodiversity but not any specific intention to protecting our actual natural environment upon which we are completely dependent. Much like the Irish language it is already incorporated in to the education system however it should be a documented national intention not limited to school students.

Proposed wording.

National Objective

Facilitate fostering care of and protecting our natural environment.

National Policy Objective 41

Support the growth and development of the maritime economy, particularly in remote coastal communities and islands

Rewording

Support the environmentally sustainable growth and development of the maritime economy, particularly in remote coastal communities and islands

There are objectives to enhance public transport within our cities but no objectives to improve rural connectivity which includes combating isolation. Rural dwellers are dependent upon cars even when they use public transport. There is no objective to decarbonise or address the unsustainable use of fossil fuel for transport in rural areas. There must be greater incentives put in place to encourage the use of fossil free vehicles.

Additional Objectives

In all of this document "Participation" is included twice. "Consultation" appears 11 times. There is no mention of the Aarhus convention or the Public Participation Networks PPNs. Irish Water, IW appears 4 times. Given that Irish Water has caused so much controversy this seems to demonstrate government confidence in IW. One could be forgiven for deducing that the people preparing this document seem to believe that IW will be a valid entity until 2040 but have little confidence in the PPNs.

Community is mentioned throughout the document but there's little by way of commitment to empowerment. Every aspect of this plan will affect our environment therefore everyone should be informed about it and facilitated to participate in it.

Climate Action

Now that the Citizens Assembly have come up with a list of recommendations our national planning framework should incorporate them in to it.

Urban Rural divide

Rural based decision makers are too far removed from the day to day policy informing and decision making at national level and nothing is done to change that. For example if a councillor from Clare wishes to attend a national policy related or informing conference such as a national energy summit or the National Economic Dialogue, it costs the local authority a lot of money in comparison to a councillor from Fingal. This must be addressed.

Public Participation

We need to devise a strategy for public participation in Ireland. The Energy White Paper had a fairly comprehensive consultation but was mostly Dublin based. No consultation since then has even tried to replicate it. We need an oversight body to implement a participation model that works. It must inform people, facilitate their engagement while working with local authorities and the PPNs.

Ireland ratified the Aarhus convention in 2012 and given it's significance to the development of plans, policies and programmes it should be incorporated into this national plan 2040. *The Convention on Access to Information, Public Participation in Decision making and Access to Justice in Environmental Matters (Aarhus Convention) was adopted at the Fourth Ministerial Conference "Environment for Europe" in Aarhus, Denmark, on 25 June 1998. Thirty-nine countries and the European Community have since signed it.

The Aarhus Convention links environmental rights and human rights. It acknowledges that we owe an obligation to future generations. It establishes that sustainable development can be achieved only through the involvement of all stakeholders. It links government accountability and environmental protection. It focuses on interactions between the public and public authorities in a democratic context and it is forging a new process for public participation in the negotiation and implementation of international agreements.

The subject of the Aarhus Convention goes to the heart of the relationship between people and governments. The Convention is not only an environmental agreement, it is also a Convention about government accountability, transparency, and responsiveness.

The Aarhus Convention grants the public rights and imposes on Parties and public authorities obligations regarding access to information and public participation. It backs up these rights with access-to-justice provisions that go some way towards putting teeth into the Convention. In fact, the preamble immediately links environmental protection to human rights norms and raises environmental rights to the level of other human rights.*

Incorporating the Aarhus convention into the National Planning Framework will be a step towards ensuring more widespread awareness of it's existence and may act as a reminder to those responsible for ensuring these rights are protected. The Aarhus convention is integral to all planning especially when one considers the fact that we are now in a transition to a low carbon economy and society.

*taken from the Aarhus Convention Implementation Guide
<https://www.unece.org/fileadmin/DAM/env/pp/acig.pdf>

Here is an excerpt from the implementation guide. We need an oversight body that will ensure these requirements are met. Public participation is vital to a shared vision with greater success in planning. Where public participation is mentioned within the 2040 document this table should be referenced where appropriate.

Implementing public participation

Under the Aarhus Convention, Parties have core obligations to put it into practice. Under these obligations, each Party has some flexibility in how it adapts the Convention's obligations to its own national legal and institutional system. The following is an overview of the clear obligations for Parties and practical considerations for implementation found in articles 6, 7 and 8. Our National Plan must ensure that these requirements are met.

	General requirements	Implementation guidance
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<p>Article 6</p>	<ul style="list-style-type: none"> • Conduct public participation early in decisions on activities with a possible significant environmental impact Give notice to the public concerned <ul style="list-style-type: none"> • Establish reasonable time-frames for phases of public participation Provide all relevant information to the public concerned <ul style="list-style-type: none"> • Provide opportunities for the public to make comments • Take due account of the outcome Inform the public of the final decision with reasons 	<ul style="list-style-type: none"> • Develop criteria for evaluating significance for non-listed activities <ul style="list-style-type: none"> • Ensure that decision makers have a legal basis to take environmental considerations into account <ul style="list-style-type: none"> • Develop incentives for applicants to engage in early dialogue • Set guidelines and standards for the quality of relevant information • Establish clear procedures for submitting comments in writing or at hearings <ul style="list-style-type: none"> • Supervise how public authorities take comments into account • Clearly define any exemptions • Flexibility in setting time-frames • May
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		<p>facilitate public participation through early dialogue with the applicant</p> <ul style="list-style-type: none">• May apply information exemptions• May limit application to decisions on GMOs if not "feasible and appropriate"
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<p>Article 7</p>	<ul style="list-style-type: none"> • Establish a transparent and fair framework for public participation in plans and programmes relating to the environment <ul style="list-style-type: none"> • Identify participating public • Conduct public participation early in development of plans and programmes relating to the environment • Give necessary information to the public • Establish reasonable time-frames for public participation • Take due account of the outcome 	<ul style="list-style-type: none"> • Develop clear rules for participation <ul style="list-style-type: none"> • Develop mechanisms for notification • Set guidelines and standards for the quality of necessary information • Develop tools for the identification of the participating public • Supervise how public authorities take comments into account • Establish policies for public participation in policy-making • Flexibility in means (practical and/or other provisions) • Flexibility in setting time-frames <ul style="list-style-type: none"> • Broad latitude in how to provide public participation in preparation of policies
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<p>Article 8</p>	<ul style="list-style-type: none"> • Promote public participation in the preparation of laws and rules with potential environmental impact • Establish sufficient time-frames for public participation • Publish or publicise drafts • Provide opportunities for the public to make comments • Take due account of the outcome 	<ul style="list-style-type: none"> • Develop clear rules for participation • Develop criteria for evaluating significance • Establish a reliable and regular vehicle for publishing drafts • Establish clear procedures for submitting comments in writing or at hearings • Supervise how public authorities take comments into account • Flexibility in setting time-frames • Broad latitude in how to provide public participation in preparation of laws and rules • Flexibility in taking due account of outcome
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Kind regards

Theresa

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