

# **Response to Public Consultation on Draft National Planning Framework from Green Party/ Comhaontas Glas**

10<sup>th</sup> November 2017

## **Introduction**

The draft National Planning Framework is a deeply disappointing document.

The document should be the working out in national spatial terms of a vision for sustainable prosperity, for using the resources of Ireland in a sustainable manner to offer a good standard of living and high quality of life to all of its inhabitants.

Unfortunately it reflects a business as usual approach to spatial planning instead of a reorientation to sustainable development. Worse still, some vital principles which we had thought were established in the Irish planning system are apparently being abandoned in this Framework.

The substantive inadequacy of the draft, failing to set out a sustainable approach to land use and spatial planning, is reflected procedurally in the deeply inadequate Strategic Environmental Assessment (SEA) Environmental Report. Although required to evaluate the environmental impact of the Framework, the SEA fails to identify the correct environmental targets which should be met and then fails to produce any quantitative assessment of the impact of the Framework, even in areas such as greenhouse gas emissions which are inherently focussed on quantifiable environmental factors. We share the doubts which have been expressed by a number of environmental organisations about the legality of the draft Framework and the SEA.

The Framework should start by establishing overall goals. The Sustainable Development Goals (SDGs) were adopted by Ireland and the other UN members in 2015. We suggest the goals for the Framework should be informed by those of the SDGs which form the greatest challenges in the Irish context and are most relevant to the development of a national planning framework.

The overall goals should be developed taking account of other international commitments we have made including in the UN Framework Convention on Climate Change and the UN Convention on Biological Diversity. They should incorporate the transition to a low-carbon climate resilient environmentally sustainable economy which the Oireachtas established as a national objective in 2015. The vision the Framework should aim for is one of sustainable prosperity and a responsible economy, not just as a generalisation, but expressed in terms of the objectives already established at national and international levels and measured by meaningful indicators.

Instead, the Framework starts by setting out a “Vision” which bears little relation to the international dialogue on sustainable development and is very much a reflection of a business as usual approach to spatial planning.

## **Biodiversity**

The Framework should set out the basis on which land use and spatial planning will play its part in halting and reversing biodiversity loss, as well as protecting our rivers and lakes, and mitigating and adapting to climate change.

Although Ireland committed in the Convention on Biological Diversity and has set out policies in the National Biodiversity Plan to halt the loss of biodiversity, it continues to be diminished at an alarming rate both nationally and globally. The Framework should take the need to protect and restore biodiversity as one of its starting points.

In particular, it should address the protection of the wild countryside it identifies as being lost. This includes setting out spatial planning principles and considerations for the identification of and implementation of large-scale biodiversity and landscape areas. One example is Coillte's Wild Nephin project. Another is the large-scale rewetting and restoration of the great raised bogs of our midlands. The restoration of our natural and semi-natural woodlands, in locations across the country is a further example.

In large areas of the country, "rewilding" approaches could both generate eco-tourism based incomes for local people and enable the cost-effective protection of water quality and nature conservation. The Framework should commit to realising the benefits for local people, Ireland as a whole and the natural environment of increased wilderness.

## **Water Quality**

The draft Framework sets out the obligations of the Water Framework Directive. The implications of those obligations became clear in the European Court of Justice's decision in the Weser case; all planning authorities are responsible for incorporating the Directive's obligations into their decisions. The Framework should set out how those obligations are to be implemented.

## **Understanding of the Circular Economy**

The draft refers to the Circular Economy in a number of regards which is welcome. However it fails to consider the implications of the circular economy for spatial planning.

Will the circular economy lead to less transport demand, contrary to the assumptions elsewhere in the Framework for increasing volumes of trade? What sort of clustering of economic activity will it lead to?

A low-carbon circular economy is profoundly different to the energy-intensive linear economy we have at the moment. Spatial planning for the circular economy is far more than simply reusing brownfield urban sites, welcome as that is. The Framework clearly won't set out the principles of spatial planning for a circular economy but it should put in place a process which will ensure that the RSES can adequately engage with this

important challenge.

## **The National Transition Objective**

The NPF is to take us up to 2040. In December 2015 the Paris Agreement was adopted. In the same month the Climate Action and Low Carbon Development Act, we set the pursuit of and achievement of a low-carbon, climate resilient and environmentally sustainable economy by 2050 as a national transition objective and legally obliged the Government to plan and work towards it.

Therefore a draft National Planning Framework for 2040 should set out the path to that decarbonised economy as it relates to spatial planning, land use and infrastructure.

It is disappointing that the Environmental Report, which is supposed to describe the impact which the Framework will have, does not come up with any estimates of the greenhouse gas emissions which will result from the Framework. This is a failure to comply with the requirements of the Climate Act.

What discussion there is of the National Transition Objective immediately shifts to a discussion of renewable energy with a brief reference to energy efficiency. Implicitly one would understand from the document that the spatial planning of renewable energy installations and associated electricity transmission infrastructure is the only climate related aspect of the NPF.

There is no meaningful engagement with energy efficiency in the Framework. One would not imagine reading the Framework that Ireland faces a challenge of renovating the vast majority of it's housing stock to adequate standards of insulation and thermal efficiency. We are making miserably slow progress with this element of transition despite the strong public health benefits available and the financial viability of the secure long term investments required. The Framework makes no mention of any of this.

In general, as with the circular economy, the Framework simply doesn't recognise the extent of the change involved with the transition to a low carbon economy. It is not simply the economy we have run on renewable electricity. The spatial planning challenges it presents are distinctly different.

## **Planning to increase transport emissions**

While the draft doesn't engage with the wider low-carbon economy issue, given the attention to the interplay of transport and spatial planning in Ireland and internationally for decades, one would expect it to set out a path towards a low-carbon transport sector. Unfortunately it does not. What the Framework should do is to set out an approach to spatial planning which both relies on and supports low-carbon mobility.

Even without the emissions predictions which should have been provided in the SEA Report, it is clear that as far as transport emissions are concerned, the Framework will

lead to increased, not decreased, emissions.

Associated with the 2018 Budget, some information on the transport elements of the forthcoming Capital Plan was released: it indicated expenditure percentages of 62% on roads, 37% on public transport, and less than 2% on walking and cycling. This is reflected in the emphasis on roads in the “National Strategic Outcomes for the National Investment Plan”.

In 2009 *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009-2020* was adopted. In it the Government set out a policy for sustainable transport and set 5 targets:

- Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of total commuter journeys to work
- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels
- A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector.

None of these targets will be met, and there is no reference in the draft Framework to either the targets or the Smarter Travel Policy.

On the other hand, the draft Framework does reference the Transport Strategy for the GDA 2016-2035, a document which plans an increase of greenhouse gas emissions from the Greater Dublin Area of about 10% over the study period.

The draft does indicate “National Strategic Outcomes” for the National Investment Plan and describes them as “an indicative outline at this point”. These outcomes are particularly alarming, showing a profound commitment to increased road provision and increased road traffic, directly contrary to the Transition Objective and to the goals and policy in Smarter Travel.

The areas in the country identified in the plan as having a “significantly weaker urban structure” are, not coincidentally, the areas poorest served by rail (and public transport in general.) It is these areas which are specifically identified for more road infrastructure. The Framework fails to acknowledge that committing to a roads-based development and transport model is a guarantee of weak urban structure.

If the Government is abandoning the Smarter Travel policy, it should say so and justify its decision. Otherwise, the Framework should reflect the change required to put us back onto the path set out in Smarter Travel, including committing that the vast majority of transport

investment will be in public transport, walking and cycling.

The Framework needs to set a very specific condition so that road investment should be restricted to investments which can be demonstrated to lead to reductions rather than increases in greenhouse gas emissions.

## **Abandoning the principle of planning around public transport nodes**

The flaw in the Framework is deeper than the unbalanced infrastructure expenditure. The lack of sustainable transport investment in the Capital Plan is matched in the draft National Planning Framework by a surprising lack of commitment to spatial planning oriented to public transport.

The skew of transport investment towards roads and the low level of investment in public transport is not new. But what is new and is really surprising about the draft National Planning Framework, in contrast to planning orthodoxy over the last two decades, is that it does not see the rail system as the core of a decarbonised transport system. In fact most of the rail lines outside Dublin get no mention in the Framework.

There used to be a policy consensus that growth should be directed to towns which have rail connections or towns which were going to be connected to the rail network. There is no reference to this in the draft Framework. Even the list of criteria on p.48 for determining which large towns should grow doesn't refer to rail. Is it really the Government's view that we don't need to ensure that development goes to places where it can be served by rail? What is this view based on?

We need to ensure that people making longer trips have a convenient public transport option available to them. This is the reality of public transport in many parts of Europe, and further afield, in places where matching political decisions have been made

- to investment in public transport; and
- to direct development to locations well-served by public transport.

Unfortunately, public transport investment decisions have been repeatedly delayed. This draft Framework constitutes a further delay for many of them. Even worse, the draft fails to commit to new public transport proposals to serve the new developing areas which will be identified from the NPF process. We need to ensure that we provide rail services to new development areas and that only areas with good rail links undergo large scale development.

## **Anti- rail / anti- public transport approach in the draft**

Unfortunately, the absence of a commitment to invest in rail and to plan for rail-based development seems to reflect an opposition to new public transport infrastructure outside major cities. It is very striking that there is considerable discussion in the draft of improving “connectivity” and “accessibility”, all of which is essentially code for provision of motorways and major roads. The only rail line outside Dublin which is even mentioned is Belfast-Dublin-Cork.

As mentioned above, the draft Framework should indicate that new development areas will be served by rail. Even before that, it should identify that existing projects for reopening rail lines or providing new lines will be taken forward. For example, the reference to Dart Expansion in the draft seems to be intended to exclude the Dart Underground, originally the centre of Iarnród Éireann's Dart Expansion proposal. Additionally, and inexplicably, the re-opening of the Navan rail line appears to be off the table.

In our other cities the lack of any rail based public transport proposals runs contrary to the stated ambition to radically increase their populations. There is a real need for the carrying capacity of new rail based transport systems if we are to increase inner city centre population densities and open up new development opportunities in Cork, Limerick, Galway and Waterford. The lack of any such planning being carried out by local councils or the National Transport Authority shows a complete lack of vision as to how these four cities can grow.

The Framework should commit to at least 50% of transport expenditure going to public transport and should set out an understanding of a national, interconnected public transport network based around a framework of frequent, quality rail services. A full investment strategy is needed for the renovation, maintenance, improvement and expansion of the rail network as the core of an integrated public transport network made up of rail and bus.

## **Walking and Cycling**

The Framework refers to walking and cycling frequently but seems to see them as modes for “inner cities” or “metropolitan areas”. It should commit to ensuring that anyone who wants to use their own feet or a bicycle to make their trips can do so safely and comfortably. If we did that, we could have walking and cycling as the dominant means of travel in villages, towns and cities. The recent announcement of €110m over 4 years, less than 2%, simply won't get us from where we are to the sort of cycling society which people enjoy in very similar climates in Northern Europe. The Framework, in line with the UN Environment Programme's recommendations, should specify that 20% of transport funding will go to walking and cycling.

## **Shipping**

It seems that the Framework simply assumes growth of shipping, but it fails to consider the implications of increased automation of freight-handling at ports and the potential for this to shift the economic balance towards increased rail freight. Rather than simply suggesting, as the draft does, that spatial planning of ports is best done at Metropolitan Area level, the Framework should specify that a spatial plan for more sustainable freight transport should be developed, with a goal of reducing the negative environmental and social impacts of freight transport.

The support for the future development of a new Dublin southern port access route is included in the plan without any supporting analysis on the costs and benefits or any strategic long term plan for the development of different national port infrastructure.

## **Aviation**

The Framework commits to expanding aviation, the most carbon-intensive means of travel by far. Aviation is responsible for about 5% of global warming, but far from contracting as all major emission sources must, it is one of the fastest growing sectors, with emissions going up by about 3% a year. Dublin Airport's expansion plans are based on demand predictions which ignore climate change. The only potential future in which their proposal for a third runway is justified is one in which no measures are taken to limit aviation emissions. If the countries of the world, including Ireland and the EU, live up to our commitments, the third runway is a white elephant. The plan also fails to outline any co-ordinated plan for the development of the variety of international and local airports across the island.

## **Governance**

The Framework is very weak on governance. The regional assemblies, responsible for the RSES are not directly elected, so their mandate and accountability is diluted, but at least they have some democratic structure. However, they cover very large areas where local councils will be competing for development opportunities rather than co-operating on strategic investments. It is hard to see how we can stop the sprawl of Dublin when it is part of a wider Eastern Regional Assembly. It is unlikely that Waterford can develop as the capital of the South Eastern Region when it is competing with Cork and Limerick as one of three Metropolitan areas in the Munster Region.

Metropolitan Area Strategic Plans are to be adopted but the closest the Framework gets to an institutional arrangement is to say that "consideration will also be given to establishing an appropriate level of political and administrative leadership for the preparation and oversight of metropolitan area strategic plans..."

It is essential that the bottom-up aspects of strategic planning are recognised and encouraged. Local authorities, municipal districts, individual towns and neighbourhoods should be encouraged and resourced to innovate and experiment, including bidding for funding for projects. We support the proposal contained within the plan for a smart fund where local authorities could bid in to receive capital funding for specific projects. There needs to be more details on the scale, timeline and working arrangements for such a fund.

In the absence of such detail, the impression from the draft Framework is the contradictory one of a central government which considers itself the holder of wisdom to be downloaded to the regions. This makes a sorry contrast to the content of the Framework which shows little sign of new thinking or imagination.

Contrary to the centralising instinct, the Framework should set the criteria, particularly sustainability and social criteria, within which local government can innovate and experiment. It should support 'a thousand flowers blooming', and establish processes whereby successful steps in the transitions to sustainable land use and economy can be publicised, disseminated and replicated.