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## **Submission on the Draft Ireland 2040 Our Plan National Planning Framework**

In this submission the topics and Page locations for discussion are in **blue** and the recommendations for change are in **bold**.

### **General Comments**

**I wish to offer my sincere appreciation for those who worked on drafting this plan and wish them well. There is much to be lauded.**

I feel it's a pity that I didn't hear the plan explicitly advertised on the tv or radio as it is necessary to get all our citizens engaged in this important plan which will have implications for our future. Many people I work with and know are totally unaware of the plan. **Perhaps more time is needed for such advertising and wider engagement.**

For me the plan's title and its text on values and outcomes says that the document is much more than a just a plan on where development should take place. It seems to have inherent elements of ideology. That it is why it is important to discuss this plan with the public more.

I have taken time to read the plan and agree with much of the ideology and direction and commend the text and objectives in that regard. However, there are some elements that are very concerning to me. In particular I am concerned about text in the document that pushes for

- a flexible workforce;
- the untempered/unqualified intensification of asset use (land use, marine use and work force);
- the reducing of planning standards to a performance based system that affect quality of life and communities and
- the lack of planning to restore and enhance our biodiversity and natural heritage (not just protect it).
- The lack of coherence and alignment with the national biodiversity action plan

I hope you will take the time to read my submission points and consider them seriously.

## Values P19-21.

### Flexible Workforce

The Framework refers to a requirement for the workforce to be flexible (P 16). I am worried that the plan can infer an inherent preference for short term contract work over full-time employment. There is a current discourse on precarious work and zero hour contracts and forcing workers to become self-employed without employment rights or pension rights (bogus self employment). **The plan should address this issue to remove confusion and it should explicitly state that it does not support such trends and all the negative consequences to people's health and prosperity it gives.**

### Values of Opportunity and Choice (P19)

The concept of Choice (and to a lesser extent opportunity) is an on-trend term for a society that values self-autonomy (sometimes sadly to detriment of others). However, these choice and opportunity value terms are not tempered or qualified by the term or concept 'responsibility to others'. The values section of the document should reflect that choice to live where you want and do what you want has implications for others and there is a social contract for Irish citizens and businesses (not just government) to be mindful of the rights of others and contribute in taxes and effort to support the less able. **This 'responsibility to others value' is core value that should be encouraged and explicitly stated.** The values should be about give as well as take.

### Value of Support and Maintenance

**I feel there is a missing value of Support and Maintenance.** I mean that there is a need for this 'Government of Ireland Policy' to explicitly state that the role of government is not just one of administration and support of development but one of 'support and care' not just for those citizens who can drive the economy forward but most essentially one of sustained support and care to its citizens who need ongoing care to partake and flourish in society.

There are also parallels in terms of infrastructure. **It should be explicitly stated that both the framework plan and the forthcoming National Investment Plan is not solely about capital investment for new ventures and development but also sustained support and maintenance of current infrastructure and sectors or society.** Chronic underfunding of maintenance programmes has led to cynderella projects and sectors of society e.g. the mental health sector, scholiosis patients, rural roads, rural post offices, autism services. **I contend it is worthwhile explicitly stating that Support and Maintenance of Citizens and Infrastructure is a core value.**

### Values of Affordability

**I feel there is a need to include the value of attaining an affordable enjoyable lifestyle as a basic core value goal.** The inclusion of affordability is not too off beat. 'Cost equalisation' is already referred to on P38 in terms of reusing sites (although this may refer to prices for developers not the citizens). Current economic discourse values consumption and competitive labour (a euphemism for cheap/flexible) as indicators of a buoyant economy. Maintaining such foundations requires a young workforce or ever increasing sources of immigrating people with moderate expectations that eventually turn into high

expectations. Eventually this catches up on itself when there are limited resources to go round. Perhaps a new paradigm should focus on affordable lifestyles where the 'competitiveness' of economic indicators focuses on **making areas other than labour cheap such as, doctors and pharmacy bills, crèche fees, solicitors fees, public transport and most especially land prices, house prices, house renting costs with security of tenure.** Focus on such costs would help reduce the cost of living for those retired or who will retire in the future (many of whom will still be renting after the bust). A reduction of the pension bill would be a big help to scarce government resources.

### Values that Tempered Consumption

There also needs to be an element to temper consumption levels and I agree with the self reliance value in this regard.

Recently there was some discourse on reducing speed limits on motorways to 60 mph (100 kmh) to reduce carbon emissions. This is an example of where people may need to temper consumption.

However, I don't think people realise what sacrifice will be needed in the future to reduce personal carbon consumption which the following source puts at 2.3 tonnes by 2040. See below link on the subject.

<http://shrinkthatfootprint.com/carbon-targets-for-your-footprint>

I feel that no matter what low carbon green technologies appear the expectations of consumption will outstrip such gains. Leadership should be taken at government level and with this plan to demonstrate a reduced modest consumerist lifestyle is still a pleasant life when it values contribution to society and the wider world. This doesn't mean that one can't occasionally blow a personal carbon budget so long as they realise the consequences of such actions and are minded to compensate or mitigate. **A low/lower consumption society is part of the self-reliance value or could be a worthwhile value on its own but I contend it should be explicitly stated or at least that personal carbon consumption should be explicitly flagged.**

## Page 25-27 High level Objectives and Vision

### High Level Objectives

The 2<sup>nd</sup> high level objectives on page 26 refer to building on Ireland's unique assets and improving 'environmental performance'. This to my mind reads like 'sweating the assets' of Ireland including its environment. **It would be better if the high level objective included a reference of enhancement of Ireland's environment and natural heritage, not just making it 'perform'.**

**It would also be better if the fourth high level objectives included a reference to not only development of places in Ireland (in a more planned way) but also to commit to maintaining infrastructure such that it serves citizens needs and does not degrade the environment.**

## The Vision

The information box on page 25 includes the current situation of a degraded environment as part of the business as usual scenario. However, the vision does not refer to improving our environment or natural heritage but instead refers to sustainable self resilience. **The vision should include an aspiration to the recovery of degraded environments to an enhanced state including restored biodiversity.**

**Ireland has commitments to do this under its national biodiversity action plan and Ireland has signed the International Convention of Biological Diversity and this framework plan is a timely document to include biodiversity goals.** The 2040 framework needs to be coherent with the national biodiversity action plan and needs to reflect the vision for biodiversity enhancement. **An explicit statement of a vision of biodiversity enhancement is apt for this plan and the plan needs to reference the convention on biological diversity and its commitments in that regards.** We need to start coherently incorporating goals for biodiversity enhancement (not just protection and maintenance) or else we will keep missing opportunities to align national strategic plans.

## Chapter 2 Pages 28+

### Point 6 Capital Dominance and Directing Growth

While I understand that the capital city will always be an attraction for new employment and new external companies, I am concerned about its capacity to cope even given the plan for regional parity.

Currently the M50 is back to pre boom levels ie a crawl, the area between the canals is chokablock with commuting people and during work hours. Sometimes it seems like a free for all in terms of people, cars and bikes transiting in this area. In addition the lived in spaces of the city centre proper seem to be more and more targeted for redevelopment for business. The city centre is losing its lived in element and being gentrified. The current targeting of UK financial institutions for establishment in Dublin post brexit seems uncaring to the people traditionally living in the city and struggling with homelessness and a rental crisis.

I am concerned that **the plan does not temper the growth enough of the eastern region and especially the capital's growth.** There would seem to be enough jobs in the city as evidenced by the M50 commute each morning. Dublin is accounting for ca. 30% of the state's workforce 512,000. And many are commuting for over an hour, to the city. See below CSO stats on same

<http://www.cso.ie/en/csolatestnews/pressreleases/2017pressreleases/pressstatementcensus2016resultprofile6-commutinginireland/>

**Perhaps in the 2040 framework plan Dublin should have a stand alone region separated out from the eastern and midland region.** That way we could see clearly the vastness of its impact and in the future whether its growth is being managed.

The plan says that the absence of a mechanism for redirecting growth is a barrier for regional dominance (P 34). This would seem to be a glib statement that it is not teased out. **The report should highlight where this 'absence of a mechanism' was investigated and provide examples of how the redirection of development in other countries both succeeded and failed** to convincingly demonstrate why regional parity is the only option. Are there not other options to develop large towns in the regions for certain sectors and temper regional city growth? Can Athlone, Carlow, Kilkenny, Naas be a focus for certain sectors, e.g. IT financial trading, Biomed, green tech etc. Have other countries done something on this front e.g. silicon valley, etc.

### **Accessible Centres of Scale (Page 36-37)**

Regarding the national policy objective 2c accessibility to centres of scale and the northwest. I am concerned that there is a focus on road infrastructure for commuters, and that heavy commuting seems to be offered as the 'social norms' of modern lifestyle. **I think there is a missed opportunity to promote and explicitly include development of infrastructure that allows working from home or remote from working hubs as an option to reduce the dependence on the car and the emissions that commuting generates. I also believe that it is inherent that public transport is thought off in this objective and this is commended but a reference to public transport and remote/home working should be explicitly stated in the objective.**

### **Compact or Sprawling urban development. (Page 38)**

The policy to re-use sites in the build up envelope is **very positive. However it must not lead to unwanted gentrification or displacement of communities and this should be clearly stated.** The reference to cost equalisation should be explained. Does this apply to a site's affordability for developers or home affordability for aspiring home owners? A clear statement of what this means would be helpful. **Affordability is a core value** and it should be included in the plan (see previous paragraph on this).

With regard to re-using sites it would be beneficial that developers are more accountable for decommissioning of sites especially manufacturing and industrial sites. Some recent windfarm developments that require EIAs for example refer to decommissioning costs being covered by scrapping sale of the infrastructure sometime into the future. The detail isn't good enough. Many industrial units have been left to fall down after the profits have long gone, many have been burnt (entry to Naas) and are subject to vandalism and anti-social behaviour or remain as derelict eyesore. The glass bottle site in Dublin still has not been developed. It suffered from a need to mitigate against harmful residue in the ground. Unfairly often times the tax payer picks up the bill after the profit-taking is over.

**I would ask that the Government demonstrate an intent to force developers of industrial and manufacturing sites to adequately fund the decommissioning of sites in the future ready for another use. This adequately funding of decommissioning costs could be done via a government controlled fund that business must contribute to or a tax or some other measure. The seriousness of adequate decommissioning should be flagged in this plan.**

### Physical Environmental (Page 43)

Within this section the text refers to parts or all of cities and towns as 'underutilised assets' with potential for intensification and regeneration. Intensification of any urban space has environmental impacts for people and natural heritage e.g. in terms of water and sewage treatment demands, habitat loss and fragmentation, noise and light pollution and particulate and green house gas emission problems. **It would be right to reference that such impacts exist and that all efforts will be made to avoid, reduce, mitigate or compensate such impacts. Objective 6 should reference the avoidance of community displacement and environmental impacts of intensification and regeneration.**

### Page 51 Planning Standards.

The paragraphs on P51 seem bizarre where they refer to planning standards being performance-based and not absolutist! In the wake of the **Grenfeld** tragedy and the **nightmare to let** programme on rte this paragraph should be severely edited. My understanding is Standards are standards and are absolute, they are achieved or they are not achieved. Guidelines are different and can be flexible but they should not be at the expense of quality of life.

**Unfortunately I feel the whole paragraph reads like it is pandering to developers demands and does not seem to refer to the needs and protection of the citizen. The reference to flexible standards needs to be removed completely.**

The reference to reduce size requirements for gardens in the suburbs and gardens, seems on trend but **is a denial of reality**. Single young people who do not need 3 bed semi detached with a garden and car space tend as they grow older to partner up and have kids and then such houses, gardens and parking spaces are critical.

Gardens are needed for kids to grow and develop and as a critical habitat source in urban habitats, Car parking and spacing is needed for stressed out new parents who will need a car to deliver kids to schools and get the shopping. People Single, or with Partnered with or without Families who live in cities often come from rural backgrounds and will need a car to connect to their home communities.

In addition the requirement to reduce requirements of car parks and gardens in the centres of cities is an obvious driver of conversion of the city centre to a work zone only and not a place for families to grow and to exclude families. It may drive gentrification once more. Such policies aimed at removing car parking and garden sizes are unthinking for the citizens and focused on business and they should be seriously curtailed. It will also mean that a house with parking or garden will be even more unaffordable for families who do not have the means and they may end up stuck in apartments, without adequate parking or garden facilities. **Please allow for families in objective 11 and do not only think of single robot like workers. Please remove performance based criteria for planning standards – its nebulous and leaves the family living in the city centre vulnerable and communities open to gentrification.**

### Page 53 Key Future Growth Enablers for Dublin

The bullet point referring to relocating less intensive uses outside the m50 ring in particular and from the existing built-up area generally is concerning. **This reads like and official policy to gradually remove/discourage living communities from the city centre.** Are living populations within the city not

valued? Is this a type of gentrification. The bullet point and policy should be clarified what the intention here is for living communities within the city centre. **There also is a need to allow/redistribute for more work locations in proximity to City villages and suburbs not just in the city centre or industrial estates. This would lessen the commute and congestion in city centres and industrial estates. Suburbs should not only be places for local services only eg tesco and coffee shops. This should apply to**

**The bullet point that refers to ensuring that water supply and waste water needs are met by new nation projects could be improved.** There should be a bullet point that includes promotion of

- a. reduced water usage via water butts and re-using grey water, and
- b. mainstreaming of green infrastructure to treat soiled street water e.g. street bioswales, domestic rain gardens etc.
- c. There is so much more urban areas can do to conserve and treat water with respect including recharging the groundwater system by disconnecting storm drains and incorporating rain gardens.
- d. **This should apply for all cities**

**The bullet point that refers to connectivity to Dublin Airport is important and positive. There could be an opportunity to develop business meeting hubs near or shortly commutable to the Airport where meetings can take place and business people can overstay.** The advantage of these hubs is that they would avoid meetings and commuting to the congested city centre. These hubs or centres could be quite tailored to the business sector in regards to digital infrastructure for physical as well as remote meetings and remote working (or logging on to their work pc's). The hubs would not be hotels which try to serve everyone's needs including tourists.

### **Our landscape is dependent co-dependent on biodiversity as well as human management (Page 64)**

The character of the Irish landscape is as much dependent on its biodiversity and functioning ecosystems as the human management of herbs, hedges and trees. Ireland's Hawthorn hedges are dependent on insect pollination to produce seed for the hedge plant stock. The heather in our moorlands that give our scenic mountain areas for our citizens and tourists to enjoy is also dependent on insect pollination to maintain itself. Farmers depend on insects for pollination to produce rapeseed and are dependent on earthworms, insects and fungi to condition the soil that produces our lush green pastures.

In addition there are connections between and among different parts of our landscape's biodiversity. Excessive application of fertilisers or weed killer in urban gardens can reduce foraging for garden bees or affect urban stream quality and aquatic life for wild fowl. Draining and Infilling of marsh or fen habitat may reduce the diversity of plants and insects and limit wildfowl habitat but it can also intensify flash floods impacting on people's homes.

**We need to plan to achieve the biodiversity objectives of the national biodiversity action plan and it is necessary to align and integrate and make the 2040 framework plan coherent with the biodiversity objectives of the national biodiversity action plan.**

1. In Objective 13 it is worth referencing Ireland's national biodiversity plan in a general reference to its countryside and rural aquatic biodiversity objectives.
2. A general referencing of the marine national biodiversity objectives should also be included in for the main marine objectives of the 2040 framework in chapter 6 for example in objective 41 and
3. A general referencing of the urban national biodiversity objectives should be included for the urban related objectives of this framework in chapter 3 for example in objective 4
4. A more detailed reference to the specifics of biodiversity related measures should be included in Chapter 8 Realising Our Sustainable Future

### Page 93 maritime economy

Maritime development and projects are not without impacts on our marine resources and environment. Inappropriate kelp harvesting reduces blue carbon capturing of ocean ecosystems as would development that affects marine salt marshes. Salmon farming has led to escapes with reports of farmed salmon now breeding in Irish rivers affecting the genetic purity of Irish salmon. There are reports that shellfish harvesting can produce large amounts of methane a green house gas.

**The text under section 6.2 does not reflect possible negative impacts of marine projects. The objective 41 needs to be adjusted to include a reference to sustainable growth and growth which takes measures to avoid and reduce negative environmental impacts.**

### coastal environment and planning for climate change (Page 95)

It would be useful for the text under 6.4 and the objective to reflect natural solutions and soft engineering as well as hard engineering such as the mentioned barrages. It may be necessary to cede land to flooding in appropriate locations or maintain or enhance sand dunes or create salt marsh or reef barriers to mitigate against tidal surges.

### Corridors along the north east coast and to the northwest (P102)

I would be concerned that the development of these corridors will put strain and pressures on SACs and SPAs that to date have had less impacts due to lower current usage of these corridors. I would like to see a general reference that acknowledges the potential of the impacts and references effort to avoid such impacts. For example wildfowl of the coastal SACs often feed inland in winter and expansion or development along these corridors could affect internationally important populations of these birds.

### Chapter 8 Realising Our Sustainable Future

Currently there is a great deal of land use change of sensitive habitats (eg bog lands and mountains) due to wind farm development and this energy sprawl driver of land use change is likely to continue into the future as line infrastructure will be needed and solar farms become more viable. While renewable energy is necessary its cumulative location on sensitive and diverse habitat is concerning. **I would like to see the plan reference efforts to reduce energy sprawl on diverse and sensitive habitats. This might be appropriately addressed in section 8.2 and objective 55 or page 113 and objective 57.**



Measures could be locating such energy related and communication developments on already developed land such as crop land. Pipelines and transmission lines could share existing routes. There will also be a need in future to allow more homes to generate as well as consume power.

Perhaps it would be fairer in some instances if large cities and urban areas that consume large amounts of energy should accept power stations and windfarms closer to their doorstep rather than reducing valuable habitats in remote rural locations.

See interesting link US article on energy sprawl <https://blog.nature.org/science/2016/09/08/energy-sprawl-is-the-largest-driver-of-land-use-change-in-the-u-s/>

**In general, I would like to see a more detailed reference to the national biodiversity plan and the specifics of biodiversity related measures should be included in Chapter 8 Realising Our Sustainable Future.**

**I would also like to see it discussed that biodiversity can contribute to reducing climate change and emissions e.g. blue carbon salt marshes or kelp forests, native woodlands, boglands and wetlands.**

**I would also like to see it flagged that inappropriate climate change mitigation or adaptation measures may have a negative impact that reduces biodiversity such as land use change of development of windfarms on boglands or building sea wall rock armour that could reduce salt marsh habitat.**

**I would like also for the 2040 plan to acknowledge the need to plan for greater support and action on helping our natural heritage adapt to climate change ie making it resilient. E.g. regional and landscape scale re-connectivity of fragmented habitats via corridors or stepping stones. More ideas can be found on Page 17 in the following link...**

**<http://www.snh.org.uk/pdfs/publications/corporate/Climatechangenaturescotland.pdf>**

**On page 114 ...**

**there may be an opportunity to include options for flood protection that includes ceding land to flooding or enhancing or creating new flood plains.**

**On page 118 ...**

**There is no reference to NHAs and pNHAs which are also afforded protection nor is there a reference to national parks. They should be included. Natura 2000 sites are not the only protected sites.**

**The habitats directive requires more than just protection of certain animals and habitats. It also requires, under article 10, that efforts be made to connect habitats across the landscape –ecological coherence in our land use planning and development policies. This needs to be reflected in the 2040 framework plan in a dedicated objective.**

## ARTICLE 10

Member States shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological ►C1 coherence of the Natura ◀ 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora.

Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.

**The 2040 framework should also reference the need to restore degraded habitats and create new habitats in order to enhance Irelands biodiversity The framework should not just reference protection of existing habitats.**

### Page 119

**Objective 59** The promotion of green infrastructure is a great idea for helping protect the environment **but it would be better if green infrastructure was more mainstreamed and considered as a default first option for the majority of projects especially those to do with water protection.** Eg bioswales and water gardens that treat street and domestic storm water. Disconnecting downspouts and allowing groundwater recharge through water gardens etc. **Perhaps objective 59 can be altered to reflect this.** Green infrastructure is already utilized in settlement ponds on our roads. It would be useful if it was applied **in a greater number of contexts e.g.,** urban domestic, rural domestic, public owned street drainage infrastructure and farming waste management infrastructure.

### P120

The text and objectives referring to water quality should be altered **to promote and allow appropriate re-use of grey water in domestic situations and appropriate treatment options of grey water at source before it enters the domestic drainage systems. A centralized organization could be also created to monitor or control maintenance of treatment of source options.**

### Section 8.4 Light Pollution

**There is a need for a paragraph in Section 8.4 on 'Light pollution' and a need for an objective on the subject.** There seems to be excessive lighting on motorways and urban areas when it is not needed. This has implications for biodiversity and for human sleep patterns.

## Chapter 9 Strategic Outcomes

**The following strategic outcomes should be included in chapter 9 Page 123 onwards**

- relating to maintenance and support of infrastructure to sustain their functioning and
- relating to support for vulnerable citizens and existing living communities
- relating to the concept of affordability (already outlined above)

- **relating to the concept of biodiversity enhancement (not just habitat protection) and relating to the measures within the national biodiversity action plan**