

**Cork
Environmental
Forum**

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Submission on Ireland 2040 Our Plan – National Planning Framework

Introduction

Cork Environmental Forum was set-up in 1995 (inspired by the first Earth Summit in Rio de Janeiro on Environment and Sustainable Development) as a Local Agenda 21 organisation that fosters, promotes and implements sustainable development in the Cork region and beyond.

We welcome the opportunity to make a submission to the National Planning Framework. We have also participated in the joint consultation process of Cork City and Cork County Council and support Cork 2050 and their submission of 8th November 2017.

Foreword

Cork Environmental Forum maintains that the key aims and the success of the National Planning Framework should be to:

- Provide balanced development across the regions of the country.
- Provide development that balances economic, social and environmental needs.
- Provide for development that brings about the transformative changes needed to transition to a low carbon society.

- Provide a planning framework that will meet our commitments to Climate Change and the Paris Agreement and deliver on the Sustainable Development Goals 2030.

The case for balanced regional development is clear as strong 2nd tier cities and regions act as accelerants and as a protective factor in times of recession. The joint submission from the Local Authorities in Cork articulate well the need to plan and invest in Cork.

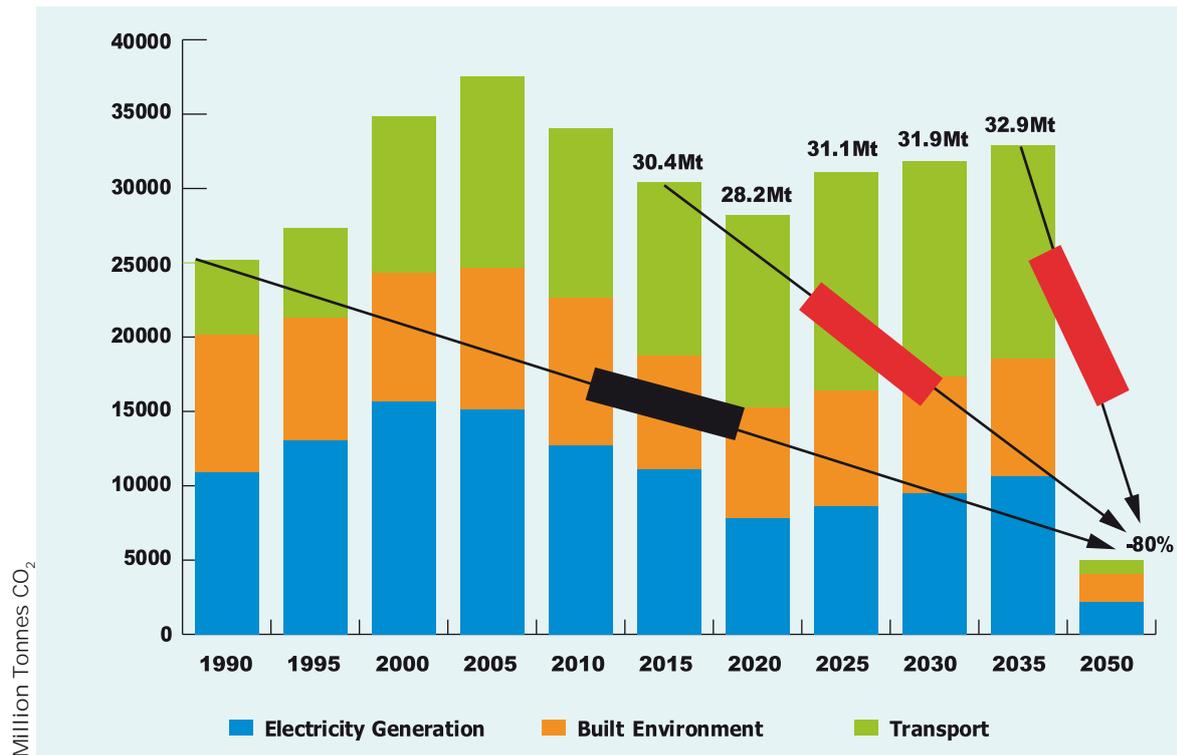
Our submission therefore is focused on the NPF providing mechanisms within the Framework which will also address the need to become a less carbon dependent country and to assist the delivery of our Climate Change targets.

The Challenge

In a global survey, commissioned by the EU, it was estimated that if all current policies are fully implemented we will still have a temperature increase of 3.5°C. A much bolder vision is needed that targets low-cost and income generating solutions to Ireland's GHG mitigation. We have to accept that a low carbon sustainable society will look very different from our current system. As set out by the EPA in key development areas such as the built environment, transport and electricity we need to reduce CO₂ levels by 80% by 2050 – just a decade beyond the Framework and much of the action is required now in order to do so.

Figure 2.1 below sets out different scales of reduction effort required to achieve the vision in the *National Policy Position* of an aggregate reduction in carbon dioxide emissions of at least 80% (compared to 1990 levels) by 2050 across the **electricity generation, built environment and transport** sectors. These effort levels are based on historic and projected emissions for these three sectors, as compiled by the EPA. With a starting point based on historic emissions in 2015, average annual reductions of 0.75Mt CO₂ in total from the Electricity, Built Environment and Transport sectors would be required between now and 2050. However, when the projected position in 2035 under the EPA's 2017 'with additional measures' scenario is taken as the starting point, this would require a reduction in emissions of almost 2Mt CO₂ per year to 2050. This clearly underlines the importance of earlier action to reduce Ireland's emissions.

Figure 2.1 Historic and Projected CO₂ Emissions from the Electricity Generation, Built Environment and Transport Sectors.



The Electricity, Built Environment and Transport sectors represented here are based on National Mitigation Plan sectors rather than total emissions in the EPA inventory. In particular, emissions from the Agriculture, Forestry and Land Use sectors are not represented as a separate objective for 2050 applies in this sector.

Source: EPA

The Opportunity

Previously there was a tendency to only see the negative impacts rather than the positive economic, societal and environmental impacts of pursuing an approach of climate action to transition to a low carbon economy where green growth is central. Climate change needs to be more mainstreamed into core strategic planning to ensure that the necessary action will be taken.

Many of the actions needed to tackle climate change present opportunities to address some of the other challenges we have in our society e.g. fuel poverty, poor health. The evidence from deep retrofits under the Smarter Home scheme point to a much more comfortable living environment with better air quality and a much reduced energy bill. Support for sustainable travel modes such as walking and cycling can also contribute to better physical and mental health and from both an educational and work perspective greater productivity.

However, as stated in the EPA Report **Ireland's Environment – An Assessment 2016** *“Strategic planning and investment are required for Ireland to make an effective contribution to global actions to avoid dangerous and irreversible impacts of climate change and to benefit from the multiple opportunities that arise from required actions.”*

That strategic planning and investment needs to be balanced across the Country and there is an urgent need to invest in the cities such as Cork, Limerick, Waterford and Galway who are drivers for regional development.

The National Planning Framework needs to support transformation in a number of key areas:

1. Planning

The National Planning Framework and other national policies will impact on Climate Change Policy and vice versa. It is imperative to have enhanced alignment between policies with Climate Change as an overarching challenge and opportunity taking precedence.

Any major planning applications should be legally required to engage with local communities and host proper town hall type meetings to enter into dialogue about proposed plans at as early as possible stage in the process to avoid costly and conflictual oral hearings on such plans. This would also deliver better compliance with the Aarhus Convention which underpins Citizens Rights to a Health Environment.

It would be very beneficial socially, economically and environmentally if community/ social/ environment benefit clauses were part of the procurement process from the initial tendering stage right through to delivery. This is common practice in jurisdictions such as Scotland.

Higher densities are needed particularly in all of our regional cities including Cork. The Framework should advocate against urban sprawl. All planning needs to be Climate Proofed and completely avoid building in areas prone to flooding and expected sea level rise. The modelling and scientific evidence is there so data is readily available and as a country we are investing a lot in such research so need to be using it appropriately.

2. Built Environment

A strategic and funded deep retrofit programme of the housing stock. Set up a financing mechanism whereby utility companies enter into a contract with homeowners to retrofit their homes using the reduction in their energy costs to pay for the retrofit. After paying off the costs for 7-10 years the homeowners will then see their energy bills drop by 30-40%. This is already being done elsewhere and has the potential to also increase employment in the energy sector and give a significant boost to the construction sector.

Increase building specifications (energy efficiency) for all new domestic and commercial construction contracts. Increase densities in urban areas and use district heating systems for large developments.

Promote construction materials with a lower carbon footprint e.g. timber construction and cellulose insulation. Transition to renewable forms of energy for heating.

Reduce materials extraction and processing and increase energy efficiencies and rates of recycling. Introduce strict regulations to restrict importation of illegal timber principally from tropical forests which are contributing to massive GHG emissions.

All of our cities require greening which helps with air quality, regulating temperatures, increasing biodiversity and improvement to our health and wellbeing.

3. Energy

Encourage community ownership and management of renewable energy projects, in Germany more than 50% of projects are owned and managed by communities. Making easier access to the grid is essential to support this.

Support investment in solar water heating and photo voltaic panels. Solar is quickly developing in Ireland but we see the same private sector driven model of large scale development with resultant issues for local communities as happened with wind. See reference in planning section on consultative processes and community benefit clauses.

An increased investment to improve energy efficiency in all sectors, part of this is educational and it is important to facilitate access for individuals and communities to necessary information and behavioural change programmes. Continued and increased support for programmes that are working e.g. SEAI's sustainable energy communities or Smarter Homes Schemes.

New Building Regulations Part L which will be in effect from 2019 will help but they do not include the embodied energy in materials, the Framework could strengthen such criteria and set minimum standards for efficiencies in lighting and in household and commercial equipment. Much of the public lighting is inefficient and causes light pollution, smarter technology allows for efficiencies.

There also needs a clear roadmap on Energy Policy, within which there is a clear energy road map for each county for a transition to renewable generated electricity.

Action and policy in this area is quite contradictory. On the one hand the Government recently banned on shore fracking (due in large part to the unrelenting work of environmental NGOs), however, Providence are currently carrying out exploratory drilling on their licenced site on the Druid/ Drombeg area of the Porcupine Basin. The State needs to present citizens with a clear framework of moving away from fossil fuels and discontinue supporting additional extraction on and off shore. Even with gas there are issues of unburned methane in the supply chain which may well undermine the environmental case for gas as a transitional fuel source.

Rapidly phase out the industrial extraction and burning of peat for electricity generation.

4. Transport

Electrification and expansion of the rail network would be far preferable and more future proofed for climate change. A large investment in the creation of a high speed

world class electrified rail network which is also used for transporting freight has the potential to act as a strong impetus for societal modal shift.

Ireland is still far too focused on building roads and motorways to facilitate the movement of people and goods by car and heavy goods vehicles. Already other EU countries have more short term targets for phasing out diesel and petrol cars, some car manufacturers such as Volvo are already on a trajectory to switch completely to electric vehicle manufacture.

A range of initiatives could be introduced to facilitate the switch to electric, some countries are providing charging points at every 10 spaces and installation of pits in households. Incentives such as car scrappage schemes need to be switched to support for the purchase of electric vehicles which are still beyond the reach, due to cost, for many citizens who would like to switch. Introduce congestion and emissions restrictions for the larger city centres such as Dublin and Cork examples already exist across Europe with France already having controls in place in Paris, Lyon and Grenoble. There is an assumption in Ireland that our air quality is good, however, the truth is we just don't know as in most places there is no adequate measurement. Electric vehicles in our built up areas would have a positive effect on air and noise pollution and on peoples health.

Continued investment in transforming our cities and towns to world-class sustainable travel friendly environments, particularly supporting planning that allows for increased walking and cycling. This includes expansion of bike share schemes, more pedestrian friendly streets delivering walkable urban environments. There are very good best practice examples elsewhere such as Copenhagen and other cities who have garnered [EU Green Capital](#) status. Investment needs to be made outside of Dublin to facilitate this, all of the resourcing in recent years has been concentrated in the Capital to provide the DART and LUAS. The only investment in the regions have been additional buses which are gridlocked as there isn't sufficient provision of bus only lanes.

Park and Ride facilities are a low hanging option in this regard and could be prioritised, it would address some of the issues for rural users to be able to pool if provision of facilities were extended to towns.

Alternative fuels may be developed for vehicles, however, biofuels should only be used after a full environmental assessment has been carried out as many tropical fuels cause deforestation and all have significant environmental impacts.

5. Land Use

i. Agriculture

The government has not yet come to terms with the transition of the agriculture and land use sector to a low carbon system. But **land use may be the sector with the greatest potential for low-cost reductions to our GHG emissions.**

Animal agriculture is an incredibly inefficient system of production. For example in Ireland in 2011 crop yields for wheat, oats and barley were ten, eight, and eight tonnes respectively while potatoes yielded 34 tonnes per hectare. In contrast **beef yield per hectare is just a half a ton** (and for this you also need feed supplements).

In Ireland 81% of agricultural area is devoted to pasture, hay and grass silage (3.67 million hectares), 11% to rough grazing (0.48 million hectares) and 8% to crops, fruit & horticulture production (0.38 million hectares) with **over two thirds of crops are fed to animals**. So 97% of Irelands agricultural land is used for the production of meat and dairy. We also export 90% of our meat and we import billions of euros of food from other countries. This means that currently European Taxpayers are subsidizing food exports to China and other countries instead of developing a secure local climate friendly agricultural system.

We need to significantly reduce the numbers of cattle being raised in the country and transition to greater production of tillage, fruits and vegetables. In order to transition to tillage, fruits and vegetables the government will need to protect crop prices for farmers to ensure a reliable income and that their production is not undersold by cheap imports dependent on inefficient, polluting, fossil fuel based transport. Denmark has a national policy for organic production and again policies such as these would have co-benefits for people, climate change and the economy.

Transitioning to an agricultural system centred on tillage, fruits and vegetables can lead to a rapid reduction in GHG emissions by reducing our methane emissions. **Methane stays in the atmosphere only for about ten years while carbon dioxide stays for more than a century**. Focusing on methane can have short term impacts and gains as reductions in methane can reduce our GHG in a shorter period of time.

ii. Forestry

We need to rapidly convert inefficient beef, sheep, or dairy operations on poor land with low stocking densities to forestry. A vision of creating the Wild Atlantic Forest stretching from West Cork to Donegal reconnecting the tiny pockets of old growth forest left in the country which will also enable Ireland to reverse the decline of some species and would also enhance the tourism in these areas. Farmers would get an enhanced single farm payment but now would be producing forest products and ecosystem services including GHG mitigation, flood mitigation

In Ireland, agricultural land accounts for 66% of the country's landmass. Our agricultural land cover is far higher than the European average of 42%, while our forest cover is one third of the European average (35%). We need to reduce our agricultural land cover to 42% and increase our forest cover to 35% of the country's landmass.

Bio-fuel from wood and waste material offers real potential in Ireland but has not been supported to date by Government. *“Ireland’s potential to develop biomass for energy is exceptional. Ireland has the best growth climate in Europe based on Paterson’s Climatic Index[17]. Ireland’s land area is approximately seven million hectares, of which 4.3 million hectares are used for agriculture and roughly 710,000 hectares for forestry. A potential of 0.5million tons of wood is recoverable for energy use, with an equivalent energy value of 200,000 tonnes of oil [8]. It is estimated that approximately 70 MW of electricity can be generated annually from waste biomass [14]”*¹

To deter the use of fossil fuels and encourage growth in renewables there needs to be a slow and constant increase in the price of energy (derived from fossil fuels) and a reduction in the cost of labour through the taxation system e.g. reduce ER PRSI.

6. Our Ocean

Ireland’s ocean resource is nine times more than its land area and is therefore hugely significant when it comes to climate change. We need to manage this resource in a much more responsible and sustainable manner if we are to ensure healthy ocean eco-systems which are vital for life and thus far for limiting some of the impacts of climate change – *“The oceans – which produce half of the world’s oxygen, regulate the earth’s climate and temperature, provide food and water, and are home to hundreds of thousands of species – have been a staunch ally in curbing climate change.”* [United Nations](#)

We are all well aware of the positive impact the Gulf Stream (North Atlantic conveyor) has on our own climate however this may well be disrupted by melting ice. Ireland as an island is very susceptible to other impacts such as sea level rise. We need to strengthen policy in managing our coastal and marine resources e.g. there is no national policy currently on something as basic as coastal erosion.

The National Planning Framework has the potential to really action the transformation needed for the country to develop in a more sustainable way and deliver wellbeing for the citizens. However, the commitment to proper development is not yet evidenced and the recent presentation on the Framework at the Environment Ireland conference had the sense of “business as usual” with contradictory inputs on recognition of the limits of the environmental carrying capacity of Dublin yet an expression that if this is “where the growth is” so be it.

The issues raised, discussed, debated and agreed as actionable recommendations from the deliberations of the Citizens Assembly are an articulation on behalf of the public on the shifts and actions they wish to see. The National Planning Framework is a vehicle that can support those actions and the needs voiced by the public to help deliver a more sustainable future.

¹ Renewable Energy Resources and Technologies Applicable to Ireland, 2009, F. O’Rourke F. Boyle, A Reynolds