

Submission on the Draft-National Planning Framework

NPF Submissions, Forward Planning Section, by email to npf@housing.gov.ie

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1. Include "Environmental conservation and protection" as the highest priority strategic objective within the Plan

We simply cannot build everywhere.

While it is true that a growing population puts more pressure on the natural environment, a new colossal threat to the integrity of our landscape and environment has emerged via the new, widespread and large scale, industrial energy infrastructure (which claims dubious green credentials) that is suddenly being driven deep into previously undeveloped areas. This is in addition to the existing fossil fuel based electrical system which must be retained since wind energy is variable. The ESB state in their submission (no. 0643) that:

"Wind cannot be relied upon to provide security of supply - it doesn't always blow. Therefore, the requirement for investment in other forms of generation remains necessary to provide back up to intermittent renewables. "

and

"The final Plan must ensure that the long-term operational requirements of existing utilities including Power Stations are protected. The importance of existing infrastructure and the associated Power Generation, Transmission and Distribution operations are strategic and national in nature. Incremental development, additional plant, new connections, environmental or performance enhancement works are 'location tied' to the established sites and cannot be carried out at alternative locations. Accordingly, provision must be made to accommodate the on-going development and strengthening of these assets at these locations"

The current Planning and Development Act has an underlying presumption in favour of development. Given the rate of change possible and the long lifetime of this plan (to 2040) there is a high risk that if environmental protections are not taken seriously and implemented in the spirit in which they are intended, that there will be extensive environmental fragmentation and degradation within the lifetime of the plan as this industrial renewable energy sprawl continues.

The existing Presumption in favour of development must be removed in order to preserve and restore as much as the natural environment as possible.

Likewise, a change in attitude is needed so that environmental protection becomes the norm and greenfield building is the exception and is only granted based on objective and evidence based assessment of concerns and robust examination of claimed benefits.

2. Green Areas / Protection Zones

Green areas / protection zones / quiet areas should be designated to retain the sense of home/place, protect the character of landscapes for citizens, protect and restore biodiversity and to retain the Ireland that attracts so much tourism.

The Irish Planning Institute submission states:

Green belt: the creation and encouragement of walkable communities; place-making and the improvement of the public realm of existing communities (e.g. greening/planting)

...

It is also appropriate for the NPF to indicate strategic policies regarding where development should not take place, e.g. the creation of green belt zones around designated urban centres."

...

"Landscape - Careful attention needs to be paid to usage and in sustaining and preserving landscape character as a resource for future generations, particularly in light of trends for dispersed settlement patterns. Tourism is one of our greatest assets so this needs to be encouraged and further developed. A greater emphasis needs to be placed on appropriate leisure and recreational facilities and on the design of such facilities in rural and urban areas. The NPF provides an opportunity to adopt a strategy for the national landscape, which, together with the National Landscape Strategy and the impending National Landscape Character Assessment, could address, inter alia, National Parks, areas of high scenic amenity, cultural landscapes in need of protection (such as Wild Atlantic Way Discovery Points). Such a strategy could be integrated with an ecological strategy that seeks to maximise the potential of the European designated sites by linking these sites into a national ecological network."

The Heritage Council submission states:

"According to research by the EPA (EPA Report No. 195, Heath Benefits from Biodiversity and Green Infrastructure, Authors: C. Carlin, M. Cormican and M. Gormally, 2016), 'recent studies suggest that people accrue greater benefits to their health and wellbeing from areas that are more diverse and perceived to be more natural, regardless of the setting (urban, peri-urban, rural) and, in particular that living near the coast was associated with greater overall health, regardless of wealth.... Other research has demonstrated the restorative value of landscapes and biodiversity in terms of stress management...

The role of green infrastructure and its importance in terms of benefits to humans has been set out in the Our Sustainable Future, A Framework for Sustainable Development for Ireland (DoECLG, 2012) as 'a network of green spaces that help conserve natural ecosystems and provide benefit to human populations through for example, water purification, flood control, food production and recreation'. Given the commitment in Our Sustainable Future to implement green infrastructure in the planning system, it is strongly recommended that the NPF assesses and maps existing and proposed GI networks/assets on a national [and regional] level

...in addition, Green Infrastructure (GI) is an important part of sustainable development, as it connects the natural world to the human world. GI is defined as a strategically planned and managed network featuring high-quality biodiversity (uplands, wetlands, peatlands, rivers and coast), farmed and wooded lands and other green spaces that conserve ecosystem values thus providing essential services to society¹⁰ - this issue is also important for climate change adaptation."

3. The Inadequate Planning Process and the need for a real Regulator

Many Infrastructure developers complain in general about the "*excessive delays*" caused by "*a lack of finality regarding planning consent for major infrastructural schemes.*"

Naturally, these developers just want to build, build, build and take great offence at their projects being questioned in any way.

The barriers for citizens to challenge inadequate planning decision-making are already huge and this fundamentally flawed system, which seeks to place barriers to such challenges rather than addressing the underlying weakness in the planning decisions has the effect of protecting and further embedding poor quality decision-making.

Such barriers include:

- short timescales to review lengthy technical documents such as EIS / AA etc.
- Poor digital access to planning documents in terms of broadband
- poor digital access to planning documents in terms of the manner in which authorities make online documents available - typically not available for pdf download...merely a page by page preview.
- A cosy Strategic Infrastructure Group which allows Developers to meet An Bord Pleanála and have meetings with secret content until these huge project applications are submitted. i.e. Developers have the upper hand, the public are starting on the back foot.
- A total lack of a planning appeals body for Strategic Infrastructure projects.
- The avoidance by An Bord Pleanála from dealing with Strategic Environmental Assessment ¹
- The adversarial and hugely costly² court system (including threat of costs to be awarded against such challengers) as a means of challenging such decisions.

Not content with already having vastly superior financial resources (sometimes taken from the taxpayer/community that they are fighting e.g. ESB, EirGrid, Bord na Mona, Coillte) and the upper hand in terms of time and expertise, it seems that they still have a fundamental issue with there being any appeal mechanism at all, complaining about '*delays in the planning process*'. It seems they would rather not have to justify their projects at all.

[A planning regulator is urgently needed - A strong but fair and objective regulator with the authority to deal with these matters and a focus on conservation and evidence-based planning. If they are truly fair and objective, this could over time improve planning matters by raising the quality of planning applications and decisions which, in-turn is likely to reduce such challenges to permissions and the associated delays.](#)

We do not need industry pets such as we have seen with the Energy Regulator and the Banking Regulator. [What is needed is a champion to which the developers have only restricted access that will act to defend the environment and the rights of the people to defend the environment and their health as set out in both the Aarhus Convention, the environmental laws \(both EU and Irish\).](#)

[Such a regulator should also have a clear focus on eliminating greenwash](#) as almost every large project coming forward now is either basing its justification on sustainability claims or for reasons of climate change. Many of these claims are dubious at best.

¹ Planning Inspector's Report EirGrid Project PL11.VA0015 page 47.

² "*Recently appointed Chief Justice Frank Clarke has said he is concerned that people are not able to vindicate their rights because of the cost of going to court.*" RTE 30th September 2017

4. Technology

Given the long lifespan of this planning framework and the fast rate at which energy/renewable energy generation technology and storage are changing, it would be inadvisable to 'lock-in' any particular technology type. For this reason, [zones for particular renewable energy types may not be advisable](#), since a) the zoning requirements would initially be very different for different energy project types and b) the technology may change significantly within that period and thus the zoning requirements may change.

In relation to possible energy zoning, the submission from the Irish Planning Institute states:

"While this might be suitable for wind energy, it is important to be cognisant that this spatial component could hinder the rollout of other sources of renewable energy, such as solar and on-farm anaerobic digestion, which have very specific location requirements. Guidelines for each renewable energy technology may be appropriate."

[Dublin must learn to control the sprawl of its demand for energy and should be the focus for any energy strategy. If energy sources can be developed which work in built up urban areas and can largely address the requirements for Dublin then it is likely that these technologies can also be utilised elsewhere in the country.](#)

Hypocritical suggestions in some submissions are noted i.e. there are suggestions by some people in urban areas highlighting the need for green spaces in urban areas-this is to be applauded, yet in the same submission suggesting that industrial infrastructure such as industrial wind turbines (these are not farms) should be located in rural areas. This double standard which sees the rural countryside as simply an area for 'exploitation' must end. Forcing communities to buy into the industrialisation of the countryside is not a solution.

[If it's not acceptable to build it in a city - you probably shouldn't build it!](#)

5. Social cohesion

Large developer-led energy projects across rural Ireland are having a detrimental societal impact and are damaging the cohesiveness of rural communities. Community energy incentives are unlikely to change this because the concerns that are raised again and again by rural communities have never been addressed.

6. General Suggestions

- Avoid building on Peatland - carbon sinks can't be put anywhere else, they must be restored in these areas where they once flourished. The current plan for restoration of a tiny percentage is inadequate.
- Forestry for Biomass should be considered alongside existing roadways.
- Existing industrial parks should be used for energy infrastructure - this type of industrial development should not be driven out into the countryside where future access for maintenance decommissioning etc. is more difficult particularly in the context of sustainable transport patterns.
- Datacentres are not strategic infrastructure. They have the electrical demand of a small city. If Ireland wants them, then it must stop pretending that they are 100% powered by renewables - they are not.

7. Closing date for consultation:

I note that the closing date for consultations is increasingly set for 4pm on a workday, in this instance, a Friday. This habit can have the impact of benefiting industry submissions (who work on these issues during the working week) over citizen submissions (where the work to compile a submission is done in free-time). Since I assume that no administrative action on submissions received will be taken over the weekend, I suggest, and request that it becomes standard practice that all future consultations will not close until midnight on a Sunday evening. It is time to place citizens at the centre of these processes and not other vested interests.

Success - will look like there is no heavy industrial development at all in rural Ireland because its impact will have been prevented in the first instance or will have been strongly mitigated.