

Ireland 2040 Our Plan

**SUBMISSION
TO
NATIONAL
PLANNING
FRAMEWORK**

Choices for Ireland's Future

Submission - Ireland 2040 Our Plan

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1. INTRODUCTION

The context of this submission is my understanding that the National Planning Framework will constitute the upper level of a multi-tiered spatial planning hierarchy that caters to regional and sub-regional variations including Northern Ireland.

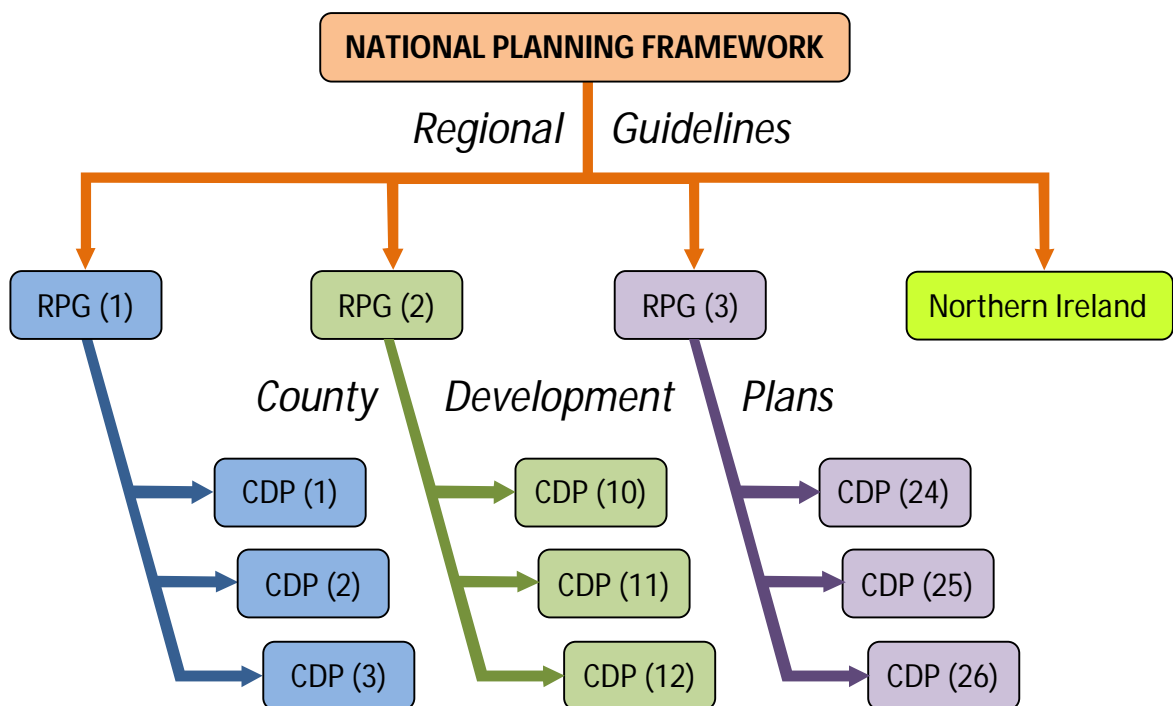


Figure (1) - Relationship to Regional Planning

The submission is therefore set out to address this upper level on matters that are of national significance, strategic in nature and have a spatial relevance from the perspective of a lifelong resident of rural Ireland. The submission also addresses the following factors as they relate to strategic spatial planning:

- Socio-economic;
- International relations;
- Technological developments;
- Climate change;
- Sustainability.

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2. IRELAND'S NATIONAL PLANNING CHALLENGES

The National Planning Framework has the potential, if it is systematically governed and administered across all Government authorities working in concert, to move Ireland from an event-reactive and clientelist-based approach to spatial planning development, to one which advances the common good whilst protecting the rights of individual citizens.

2.1 Review of Historic Planning Administration

The public have watched enough Planning Tribunals to be fully aware of the planning practices of the past; there is no need to recap on these in this submission. However, the consequences have been inappropriate urban development and the social deprivation that accompanies it, together with decades of one-off rural housing development as farmers sold off plots to urban families who could not afford contemporary housing in the towns or cities in which they worked.

We are where we are, and people have invested huge personal capital in their homes. Remediation of previous planning shortcomings is an incremental process, and any framework that attempts to implement a sudden reversal is likely to be outmanoeuvred by human ingenuity.

2.2 Avoiding the Mistakes of the Past

The discussion document points out in 2.4.1 - 2.4.5 that whilst the National Spatial Strategy¹ (NSS) sought to achieve a better balance of social, economic and physical development through the designation of gateways and hubs, not one of the 22 fastest growing towns in Ireland between 2002 and 2016 was an NSS gateway or hub settlement.

It also notes that the level of actual population growth in 22 designated NSS gateways and hubs from 2002 was replicated by the new population that emerged in 22, completely different and separate non-NSS designated settlements, despite the fact that they were much smaller at the outset.

There was no provision in the 2002 NSS to enable it to adapt. This would indicate that the robustness of this new national planning framework will be a function of the flexibility that is built into it, to enable it to adapt to ever changing circumstances without diluting the key direction it seeks to implement.

Caveat: The current consultation, and the formulation of a national planning framework will not only be a futile exercise, but a wasted opportunity, if it is permitted to be overturned or circumvented in the coming years for some short term advantage as political and economic factors change.

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3. PEOPLE'S HEALTH AND WELL-BEING

3.1 Sustainable Communities

The word 'sustainable' is a pervasive throughout the PDA 2000² (as Amended), but no definition is provided as to what the word means. The Department of Housing, Planning, Community and Local Government defines sustainable development on its web site³ as:

'development that meets the needs of the present without compromising the ability of future generations to meet their own needs'.

I therefore propose the following key attributes of a sustainable community in the Irish planning context:

- Present and projected economic viability without disproportionate debt;
- Socially cohesive and caring with minimal division between citizens;
- Environmental harmony without harmful practices or emissions.

If these attributes are used as a yardstick for meeting the needs of the present without compromising the ability of future generations to meet their own needs, it is immediately apparent that sustainability is not a characteristic of current planning practices, despite the frequent use of the word in all planning decisions.

3.2 Greater Policy Integration

It is apparent to everyone that Government Ministers in successive governments over a long number of years have been, and continue to be, fiercely defensive of their own departments and budgets due to the competitive nature of government financing.

Joined-up thinking has little scope of flourishing in this environment, and integrated inter-departmental planning and administration falls by the wayside. Ireland cannot afford to permit this 'silo-thinking' approach to continue into the future and into this plan.

3.3 Quality Of Life

Spatial planning can create an environment within which individual people and families can live, work and avail of commercial, educational, medical, social, religious and recreational facilities. The onus is then on the individual person or family to enhance their 'quality of life' by leveraging the environment provided to further develop and realise their own potential.

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3.4 Improved Living Environment

I visualise the living environment as a series of concentric layers surrounding a person or family nucleus as shown in Fig. (2).

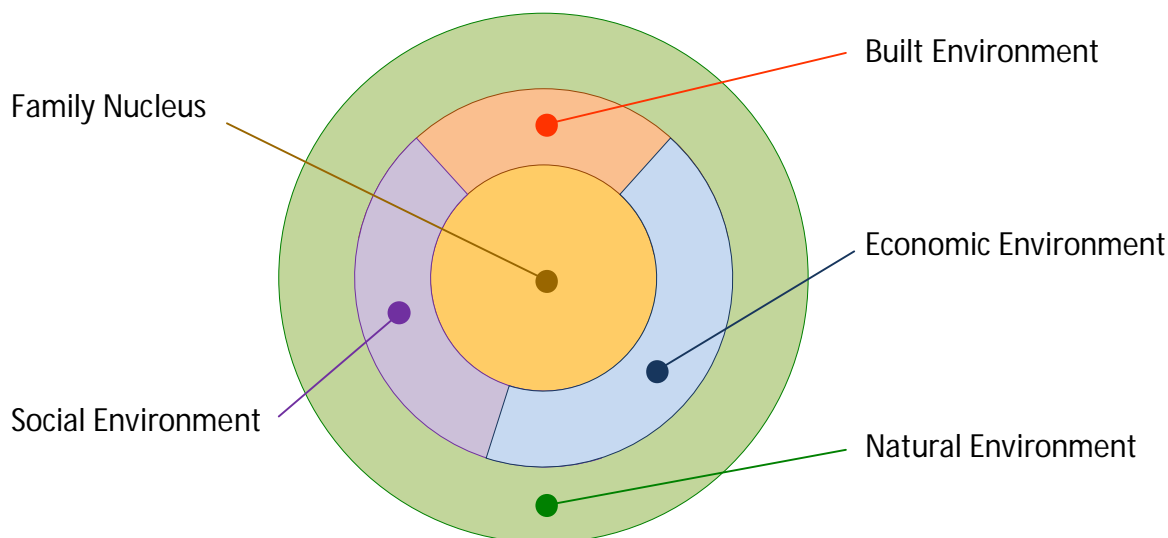


Figure (2) - The Living Environment

The ranking that the person or family nucleus places on each of these environments will vary between urban/rural (the term 'culchie' was not invented yesterday), social class (yes, it exists) and the balance chosen between built and natural surroundings.

Improving the living environment to relieve social disadvantage can have a vastly different meaning depending on location, in that the inner city perspective on improvement will not hold water for the low wage earner forced to live and commute far from the work place or for the rural elderly who have no services in their area at all.

3.5 Fostering Healthy Living

In planning facilities for healthy living, the National Planning Framework should not overlook those who live in rural Ireland without easy access to sports and recreation facilities, where narrow roads without verges make both walking and cycling dangerous activities, and further encourage the unhealthy option of car transport.

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3.6 Reducing Car Dependence

The reasons for car dependence include government policy that encourages car ownership by incentives to the motor industry, cheap car finance and a dearth of public transport outside of urban areas. New entrants to public transport are permitted to 'cherry-pick' profitable intercity routes, with an adverse knock-on effect on provision of less popular rural transport.

The consequences of high car dependence include economic loss (from running costs and road wear), parking requirements at stopping nodes and both CO₂ and toxic gas emissions from fossil-fuelled vehicles (or electric vehicles charged from a fossil-fuelled electricity grid).

The NPF should seek to redress public transport policies that skew service provision and favour city centre or town centre based commercial development planning policies with a view to restoring footfall and enhancing social cohesion.

3.7 Plan-Led Development

In order for community development needs to be plan-led, it requires:

- A community identity and community leaders;
- An overarching plan providing general direction in accordance with national goals;
- A forum for community needs to be identified and expressed as they evolve;
- A means of implanting the required solutions.

It is regrettable that local democracy has become ever increasingly emasculated as decisions have become more and more centralised. The mechanisms of the so-called Public Participation Networks⁴ (PPN) at county level are in my view a charade.

County level revenue is directed to central government (Local Property Tax) and Councillors have been reduced to toothless functionaries that simply rubber stamp central government policy such as Section 31 Ministerial Directions⁵ that override community and Councillor driven variations from a County Development Plan.

A plan into which a community has to all intents and purposes very little input is unlikely to be implemented in a meaningful way, and may well be counterproductive where its provisions are subsequently understood and rejected by the community they are intended to regulate.

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4. RURAL IRELAND

4.1 Harnessing Resources

In an era of mechanised and automated mega-agriculture, Ireland is fortunate to have retained at least some of its former unspoiled nature and scenery. This is a scarce resource in modern Europe, and once despoiled can never be regained. The NPF should seek to preserve the unique Irish countryside and harness the tourism and outdoor activity potential that remains to provide rural employment and sustainability.

4.2 Reversing Population Decline

There is sometimes a tendency to equate employment opportunities with third level education, and this has led to a dearth of competent operatives, craftspersons and technicians in the country. Particularly in a rural environment distant from centres of concentrated employment, it is difficult to see how full employment can be achieved where third level education is viewed as the only option.

Furthermore, third level education and related occupations do not necessarily suit everybody; many people may prefer to pursue a less academic route to entering and remaining in employment. The choices made in rural planning policy will dictate the job opportunities that flow from it.

Over the past two decades, Ireland has consciously moved away from heavy industry to light manufacturing, ICT and tourism related employment. The skills, resources and infrastructure necessary to manufacture heavy industrial generating machinery simply no longer remain as they do in industrialised continental European countries.

Recognising this fact, Ireland should play to the existing strengths of the rural population and reorient education and training to include rural-based occupations that do not require third level qualifications in every instance.

4.3 Supporting Rural Living

The Action Plan for Rural Development⁶ has the objective of ensuring the success of vibrant, rural communities across Ireland by way of supporting the creation of 135,000 jobs in rural Ireland, bringing high-speed broadband to every home and business and revitalising towns and villages through 4,000 projects.

It is essential the NPF is fully harmonised with the plan in order for the benefits to be realised. The objectives of the five key pillars are briefly examined overleaf in the context of the National Planning Framework.

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1 Supporting Sustainable Communities

- Make rural Ireland a better place in which to live and work by revitalising our town and village centres through the implementation of initiatives such as the Town and Village Renewal Scheme, the CLÁR and RAPID Programmes and measures to support people to live in town centres.
- Enhance local services in the community through the provision of support for rural GPs, through ongoing development of the primary care sector to deliver better care close to home in communities, through support for the rural post office network to adapt to a changing business environment, and through continued access to schools for children in rural Ireland.
- Empower Local Communities, including through the development and support of the Public Participation Network and Local Community Development Committees, to ensure that a diversity of voices is heard and included in local decision-making processes and that communities continue to identify their own needs and solutions.
- Build better communities through ongoing investment in the LEADER Programme and support vulnerable rural communities through initiatives such as the Rural Social Scheme.

2 Supporting Enterprise and Employment

- Grow and attract enterprise and jobs through the roll out of the eight regional Action Plans for Jobs and the development of an Atlantic Economic Corridor to promote balanced regional development.
- Support sectoral growth the continued development of the agri-food sector through the implementation of Food Wise⁷ 2025 and roll out initiatives to develop the renewable energy sector and International Financial Services in rural Ireland.
- Ensure rural communities have the necessary skills to meet the needs of the labour market and to encourage innovation and maximise assets.
- Support rural jobseekers through the Intreo offices and initiatives such as the Social Inclusion and Community Activation Programme, Tús and Community Employment.
- Support farm and fishing incomes through CAP payments, the Rural Development Programme and other Government supports.

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3 Maximising our Rural Tourism and Recreation Potential

- Increase tourist numbers to rural Ireland by 12% by 2019.
- Support sustainable jobs through targeted rural tourism initiatives, including through the support of key marketing initiatives such as Ireland's Ancient East and the Wild Atlantic Way, as well as developing the potential of Ireland's Lakelands.
- Develop and promote Activity Tourism in rural areas through the development of blueways, greenways and other recreational opportunities.
- Develop and promote our natural and built heritage through investment and development of our Gaeltacht areas, enhanced promotion of our National Parks and Nature Reserves and other natural and built resources.

4 Fostering Culture and Creativity in Rural Communities

- Increase access to the arts and enhance cultural facilities in rural communities.
- Further develop and enhance culture and creativity in rural Ireland through the establishment of culture teams and creativity hubs as part of the Creative Ireland Programme.
- Promote the Irish language as a key resource in Gaeltacht and other rural communities.

5 Improving Rural Infrastructure and Connectivity

- Bring high speed broadband to every premises in Ireland through the rollout of the National Broadband Plan and improve mobile phone access in rural areas.
- Improve rural transport links through a review of services, support for our regional airports and investment in rural infrastructure.
- Implement flood relief measures and other land management measures to protect our rural infrastructure.

It is my submission that, notwithstanding my expressed reservations concerning the effectiveness of the Public Participation Network (see 3.7), the measures contained within this plan as summarised above should be key inputs to the National Planning Framework.

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5. SUSTAINABLE ENVIRONMENT

Since the National Planning Framework does not define what is meant by the 'sustainability' of Ireland's unique environment in a national planning context, I have paraphrased the definition in Section 3.1 of this submission as:

'conservation of the environment that meets the needs of the present without compromising the ability of future generations to meet their own needs'

It is clear that the Government regards climate change as constituting the single most important issue confronting the sustainability of the environment.

5.1 Climate Action

The National Climate Change Adaptation Framework⁸ recognises that Intergovernmental Panel on Climate Change⁹ (IPCC) provides the authoritative international scientific assessment of climate change. Ireland ratified the Paris Agreement (COP 21) on 4 November 2016.

The Department of Environment, Community and Local Government invited the public to submit views on the development of the National Low Carbon Transition and Mitigation Plan in July 2015, and the discussion document contained the breakdown of greenhouse gas emissions by sector shown in Figure (3) below.

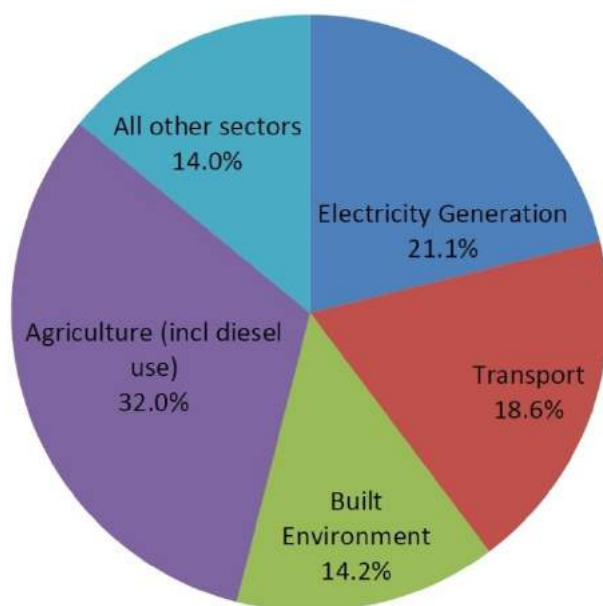


Figure (3) - Irish Emissions 2012 for all gases

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A briefing document¹⁰ issued by the Department of Communications, Climate Action and Environment last month undertakes to commence public consultation in March 2017 to address climate change mitigation in the four key sectors shown in Figure (3) – electricity generation, built environment, transport and agriculture.

Ireland is committed under the Effort Sharing Decision (ESD)¹¹ to reduce domestic GHG gases by 2020 to below the 2005 level, and under the 2030 EU climate and energy targets to a 40% reduction by 2030 to 1990 levels. It is essential the NPF is fully co-ordinated with the forthcoming National Climate Change Adaptation and Mitigation Strategy to ensure joined up thinking.

Note: (1) Future GHG levels will be achieved only if emissions from existing sources are reduced and additional sources are not added (in other words, the goalposts are not moved). The recent rush to approve low-employment, high-energy developments in the form of data centres will render the target unattainable and indicates a lack of joined-up thinking between the Department of Jobs, Enterprise and Innovation, the Department of Communications, Climate Action and Environment and the Department of Housing, Planning and Community Development.

(2) Whilst not included in domestic GHG emission reduction targets, emissions from (discretionary) air travel and (international trade) marine traffic are significant factors in the environmentally-connected world that we inhabit and should be a consideration in the National Planning Framework.

5.2 Development and Land Use Change

Public planning policy implemented by all administrations in Ireland over the past 50 years or more has supported dispersed rural housing rather than the consolidated settlement pattern found in continental Europe where farms are huge and farm labour lives in consolidated hamlets and villages.

Irish farms have historically been small, and sons and daughters frequently build on parcels of land from the family farm, or farmers have sold off plots to people who prefer to live in the quiet of the countryside.

The direct consequence of this historic planning policy is that there is far less potential to develop onshore renewable energy such as wind farms in Ireland than there is in continental Europe, without adversely affecting the lives of large numbers of people who have their homes in rural Ireland.

In the modern idiom, we need to recognise that we are where we are.

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The planning code is well used to balancing competing interests. The key tool used for this is Zoning Policy, whereby incompatible uses are kept apart by appropriate zoning. Industrial activities are directed to areas zoned for industrial use and homes are built in areas zoned for residential use.

This is a sensible approach that has stood the test of time. The recent practice of designating vast swathes of each county as 'acceptable in principle' for locating industrial scale electricity generation plant is an unacceptable attempt to justify shoehorning of massive wind turbines into inappropriately close proximity to people's homes.

5.3 Re-Energising Ireland

There is no question that citizens understand the necessity for an energy infrastructure to support the needs of residents, agriculture and industry, and that such an infrastructure will be intrusive to a certain extent.

Irish strategic planning has been poor in the past; there has been little or no thought put into reserving infrastructure corridors when approving one-off rural housing, with the result that any proposed corridor is likely to infringe on existing residents.

It is essential that the NPF is structured to ensure engagement with community stakeholders at an early stage in a true spirit of openness and transparency in order to avoid a popular backlash, with no secret advance deals that only become apparent to community stakeholders at a late stage.

It is the contention of this submission that so-called "Community Gain" initiatives are divisive in that they serve to split opposition such that the legitimate concerns of minority community stakeholders are ignored. Furthermore, they are fundamentally dishonest in that it is the Irish consumer that ultimately funds them.

It is also important to be honest about the extent of the energy infrastructure necessary for the needs of the island of Ireland, and those associated with commercial deals to supply energy outside the country. Infrastructure required for energy export projects should be clearly delineated from that required for internal purposes, and treated separately.

Security of energy supply is a blend of unpredictable renewable energy sources such as wind, and storage capacity of fuels that can be drawn down to provide demand-lead supply. Unlike the mountainous areas on continental Europe, the flat nature of the terrain in Ireland is not conducive to pumped storage energy storage, which requires a combination of pressure and volume to provide the necessary kinetic energy.

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Re-energising Ireland is just one component in a sustainable future for Ireland, as a country that is able to provide for all aspects of its citizens' expectations. These expectations include a peaceful and harmonious lifestyle, affordable food, energy, healthcare and education, adequately remunerated full employment and social supports for the disadvantaged and aged.

5.4 Heritage and Landscape

The National Landscape Strategy¹² (NLS) recognises that the landscape is Ireland's ultimate resource, shaped by the activity Irish people over thousands of years, supporting, nourishing and sheltering countless generations and inspiring Irish literature, music, poetry and the arts.

The landscape encompasses our towns, cities and villages as well as the stunning Irish countryside and dramatic coastline. It can and will continue to accommodate development and multiple land uses, and be appreciated in many different ways. However to have a sustainable society, environment and economy, we need to both embrace change and to manage our landscape in a considered, integrated and planned way.

The European Landscape Convention¹³ defines a sustainable development as the achievement of a balance between social, cultural and economic needs and the environment and landscape. So should the National Planning Framework.

5.5 Green Infrastructure and Biodiversity

Over the last few decades as commercial forestry and agricultural reclamation have increasingly sterilised Irish river systems, there has been a parallel increase in destructive downstream flooding, together with the erosion of farmland adjacent to watercourses that are increasingly becoming torrent streams following heavy precipitation.

This has been exacerbated in recent years by grants of planning permission that will result in the last remaining intact uplands, and their crucial flood attenuating effects, to be devastated by unlimited wind farm development within river catchments. What few areas of undamaged heath are left are in remote mountainous areas.

Taken together, these "still intact" areas of undamaged heath account for a very small percentage of what were once substantial natural water regulating mechanisms. It is essential that the NPF contains measures to preserve the important flood attenuating effects that these habitats have on the hydrology of Irish river systems.

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REFERENCES

- 1 National Spatial Strategy for Ireland 2002 - 2020, People, Places and Potential.
- 2 Planning and Development Act 2000 (as Amended), Part I(2), Interpretation.
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- 5 Section 31, Planning and Development Act 2000 (as Amended), Ministerial directions regarding development plans.
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- 7 Food Wise 2025, A 10-year vision for the Irish agri-food industry, Department of Agriculture, Food and the Marine.
- 8 National Climate Change Adaptation Framework 2012, Building Resilience to Climate Change, Department of the Environment, Community and Local Government.
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- 11 Effort Sharing Decision (Decision No. 406/2009/EU).
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- 13 ETS 176 – European Landscape Convention 20.X.2000, Council of Europe.