

## National Planning Framework Submission

The following is the response from Eamon Ryan TD, Leader of The Green Party Comhaontas Glas to the ten questions set out in the National Planning Framework public consultation process.

### 1. What should Ireland look like in 20 years?

- We will be well on the way to a low-carbon climate resilient society in line with our commitments under the UNFCCC Paris Climate accord.
- The Irish economy will be less reliant on foreign direct investment with a big increase in employment in energy, forestry, food production, tourism and digital service industries.
- Ireland will have a well managed migration system where new citizens are made welcome and are successfully integrated into existing communities.
- The lengthening of commuting distances and spread of one-off housing will be replaced by a return to living closer to the centre of villages, towns and cities. High quality rental housing will be more common and the state will have a larger role in housing provision.
- There will have been a modal shift towards public transport, cycling and walking as most favoured transport modes. Capital investment will be concentrated on public transport as automation and car sharing applications reduce the demand for private cars.
- High streets will be busy with new small businesses, retail, rental and repair outlets which are part of a new circular economy. Economic success will be measured by quality of life improvements and the level of reduction in waste rather than by economic growth and consumption indicators.
- Income inequality will have reduced as a new 'basic income' form of social security rewards those working in caring and social enterprise roles and liberates people to join the enterprise economy in a more flexible way.
- We will have introduced a universal form of health care where everyone has access to a humane preventative, primary and acute health care system.
- Ireland will be advanced in the deployment of new technologies and citizens will be confident to share personal data under ethical digital rules which support the delivery of public and private services.

- We will have achieved good ecological status and good surface water chemical status in our rivers, lakes and coastal waters, in compliance with the Water Framework Directive.
- The loss of wildlife will have been halted and reversed, in line with our commitments under the Convention on Biological Diversity.
- There will be a strengthening of democratic systems at a local, regional, national and European level with a more active participation of local communities in all planning and economic development decisions.

## **2. How do we ensure that every place can realise its potential?**

### Development Goals

We commend the way in which the National Planning Framework has been designed to encourage local communities, towns, cities and regions to consider how they will grow. Rather than relying on a top down approach, where central Government directs which regions and cities are going to be the focus of development, it is right that we should allow each region consider how it can realise it's own potential.

For such an approach to work, our key development goals must be clear from the outset:

- These could include how we realise our potential to create strong communities where people look out for each other and where public services can be provided in an efficient, flexible and respectful manner.
- We should aim to save people time and improve their quality of life and economic productivity by reducing the amount of travelling people have to do.
- We are able to provide fulfilling employment for people across the island in high quality, well paid and secure job opportunities.
- Our economic model allows us meet all the Sustainable Development Goals agreed in New York in 2015, which provide the broad manifesto for our future development.

The National Planning Framework should be aligned with the Mid Term Review of the Capital Investment Plan and be in tune with our National Climate Mitigation Plan. Plans for capital funding in each region should be assessed on the extent to which they meet the above goals.

## Democratic Oversight

A 'bottom up' National Planning Framework approach will require an increase in the powers of district, county and regional Government for it to work.

At a district level we should use this opportunity to re-create a new democratic tier, centred around new district councils which have a real role in the delivery of local public services, such as waste collection, environmental protection, local traffic management and business support.

At a county and city council level there should be a return of power to democratically elected representatives, starting with the creation of new directly elected mayors in Dublin, Cork, Limerick, Galway and Waterford, with real powers over planning, transport and development.

The regional structures introduced in the [Electoral, Local Government and Planning and Development Bill](#) in 2013 are not suited to the approach being suggested in this new National Planning Framework. The existing three regional authorities cover too large an area and have too few powers to be effective. It is critical that appropriate regional structures are in place to reflect the new national planning framework objectives. We should replace the existing oversized regions with smaller regions, perhaps along the lines of the five new regional areas outlined in the map below. We then have to make sure the new regional authorities have greater involvement in the coordination of housing, waste, water and transport infrastructure.

### **New Regional Boundaries**



## National Land Use Plan

Regional planning should also take into account geographical features such as the river basin districts. Such plans will also have to be co-ordinated as part of a national land-use strategy that will be central to our climate change mitigation and adaptation plans. To get flood prevention and drought management right we will have to manage each river basin system as an integrated unit, monitoring the water system from mountain top right down to the sea.

We will also have to review what are the best forms of forestry and farming for each different soil type and support the development of large areas of the countryside for the protection of biodiversity and the maintenance of natural carbon sinks.

## Regional Capitals

The regional plans will have to outline how hinterland communities relate to the large urban centres. We need to develop cities with sufficient concentrations of population and services to provide a counterbalance to the rapid further development of the Dublin area. For example, it may make sense to designate the South-East as a distinct region where Waterford city serves as a regional capital, in a way which also supports the development of neighbouring counties.

The design of regional structures will also have to take into account the cross border implications of future Brexit negotiations. We have to consider how a Dublin to Belfast corridor may become an important development area and how changing cross border relations could have implications for how Derry and Sligo are seen as development centres in the North West.

Not all regional development plans should be seen within this 'city-centred' narrative. There will be a case for specific approaches to be developed for historic market towns or rural areas where success will require their own new economic development initiatives, rather than relying on being part of a commuter belt for the nearest city. We should be open to allowing each town and rural area propose and test their own development model and share best practice from those communities that achieve the best results.

### **3. Where will jobs be located and what kind of jobs will they be?**

#### **A New Industrial Revolution**

We are at the beginning of a new Industrial Revolution where advances in digital, clean energy and transport technologies will allow for increases in productivity and a more efficient, clean economy. Ireland can be at the forefront of this revolution if there is cooperation between Government, Industry, Academia and Civil Society to create an environment for innovation.

We are already seeing the establishment of this new enterprise culture within new start up companies in several of our cities. We need powerful and reliable broadband infrastructure across the country to broaden this advance and to allow people to work from home and from more remote areas as part of this new economy. We can replicate successful examples like the [Ludgate Hub](#) in Skibbereen in Cork to develop new technology jobs in a better connected 'gigabyte' society.

#### **Digital Bill of Rights**

The success of new technologies will depend on how easily they can be adopted in everyday life. That success in turn will depend on our ability and willingness to share personal data so that services can be aggregated in an efficient manner. This will work best when control of digital information is centred around the interests of the citizen rather than Corporations or the State. Employment will flourish where digital rights are protected, privacy and open access to information are both secured and there is transparency in all public transactions.

This new economy will not only be about the provision of software services. An opportunity exists for us to bring manufacturing back to Ireland and produce high-end goods in smaller production units. We should support movements like [TechShop](#), a membership-based workshop and fabrication studio that provides access to machines, tools and software, as well as a community of digital and hardware innovators and entrepreneurs, allowing them to hire parts of the factory and develop prototypes.

#### **A Just Transition**

Advances in technology will also lead to a loss in jobs due to increased automation and advanced manufacturing technologies. Jobs will also be lost from the traditional fossil fuel industries which we will be winding down over the next two decades. We will support the transition to a better, low carbon economy that replaces these lost jobs and supports social and environmental justice for all peoples and species.

In order to achieve such a fair and just transition, the Green Party advocates for the creation of a dedicated 'Just Transition Commission' that should be at the centre of a new partnership model that oversees the transition of jobs from a fossil fuel economy to a low carbon economy.

This will involve representatives from relevant business, science, trade union and local communities working together with public servants and local representatives to overcome the wide variety of obstacles we can expect in the transition that needs to take place. We need an iterative process in formulating public public and testing these new low carbon initiatives.

We should be open and willing to learn from reverses that will naturally take place by having a sophisticated monitoring and review process of changes we make. Such lessons will come from large scale real life application of solutions rather than just academic research into the area. The prize for those willing to show leadership in the transition will be the fact that we become a centre for the development of this new clean economy.

This shift to a new economy cannot be used as an excuse to further erode worker security. Rather than a reduction in working conditions to short-term or zero-hour contracts and the introduction of unpaid apprentices, we see the opportunity to invest in the retraining and upskilling of workers and the opportunity to create a more secure economy, where the benefits are more widely distributed.

Support must be provided to workers in fossil fuel dependent industries to retrain and up skill into new jobs in the clean energy sector. These jobs will have to be as well paid and as secure as those they had to leave behind. Research by Joseph Curtin of the Institute of International and European Affairs estimates that up to 80,000 jobs may be created in renewable power, smart grid and building retrofit industries. One of the benefits of developing this sector is that new employment opportunities are likely to arise in those counties that have suffered most from outward migration.

## Planning for Renewable Power

Implementing a planning framework that decarbonises our energy system must be done in a fair and equitable manner. The development of a viable and vibrant community renewable energy sector in an Irish context comes at a vital juncture but is becoming increasingly contentious.

The most common backdrop of this contention is the Irish planning system, where applicants and objectors frequently clash over the deployment of wind energy technology and electricity grid developments required to support our energy transition. [Opposition](#) is now likely to extend beyond wind energy to solar energy developments. In a [study undertaken in January 2016](#), a

number of grounds for objection were identified as being consistently raised by communities to development proposals for commercial, utility scale ground mounted solar farms.

Opposition to the deployment of RE developments is not a uniquely Irish phenomenon. Countries in which RE technology was traditionally welcomed by local communities soon came up against significant local opposition. The Green Party believe that a better development model can be achieved through the creation of a National Community Energy Strategy, operating in tandem with the National Planning Framework and including:

- Specific targets for Community Energy ownership on a statutory footing, as in Scotland where there is a target to generate 500 MW of renewable energy from community owned projects.
- A funded, competent and trusted intermediary body (or bodies) that can support and empower Community Energy projects with feasibility, technical, practical and finance advice and support, such as the Local Energy Agencies, or Local Energy Scotland.
- Support for co-operative ownership models akin to companies such as ‘Eco-power’ in Belgium, which aggregate small shareholders to fund larger scale renewable energy projects and which act as an innovative local electricity supply company.
- A ‘Danish-Model’ approach to planning for large private wind-farm developments where at least 30% of investment shares in a development should be raised locally from the public within a pre-determined radius of the development. This would be facilitated by an independent state-funded body and by post-office/credit union loans.
- The Green Party would support the conclusions reached in the 2016 SEAI funded project developed by Tipperary Energy Agency, Tipperary County Council and Philip Lee Solicitors [\*‘Legislative Mechanisms for Local Community Ownership and Investment in Renewable Energy Infrastructure’\*](#) as well as placing such community obligations on a statutory footing.
- Grid connection access to be based on a points system that prioritises indigenous energy developments which demonstrate a community or public benefit, and which provide stability to the grid: This will ensure that priority grid access will be given to community and state-owned RE projects as speculative purchasing of grid connections has locked many of these out of the market.
- Facilitate the development of Community Microgrids through the smart grid program.
- State ownership of renewable technologies including the use of the land bank owned by Coillte and Bord Na Mona.
- Fair and secure payments to support community energy, micro-generation and auto generation, at a price that balances the long term socioeconomic costs and benefits of this new power supply.

## Farming

New employment can also be created in rural Ireland as part of our change in land use to manage our climate change commitments. The number of Irish farmers involved in horticulture has fallen dramatically in recent decades but this can be reversed if we create new distribution systems involving 'community supported agriculture' schemes where consumers have more direct connections with producers. Such new distribution channels could also see beef and dairy farmers getting a better return for high quality output, which requires less expensive farming inputs.

The [Teagasc Farm survey](#) in 2015 showed the average age of an Irish farmer was 57. In 2011 they had it at 54 and in the year 2000 it was lower again at [51](#). Women also own only around 10% of [farming land](#) and this is skewed towards over 65s as widowed women are the predominant representatives. Land ownership is also deeply skewed towards the wealthier section of the [population](#), only 10% of households owning any land and the top fifth of households by wealth own 90% of all land by value.

We need a new relationship with land ownership so that young people who are not due to inherit a family farm can still have access to land which they can farm on a medium term contract basis. We need to switch our culture from one which is obsessed with land ownership to one that promotes land stewardship and can do so by making sure that all our support systems incentivise greater access for all young people to work on our land.

## Forestry

We expect there will be a large increase in employment in the forestry sector, especially as we expand to a new form of 'continuous cover' forestry which requires more specialist thinning of trees from higher value plantations. The national planning framework provides an opportunity to reassess our forestry strategy. A lot of forestry plantations in recent decades was carried out on ill-suited marginal land without the proper infrastructure to harvest and manage the crop.

We must learn lessons from that process and insure that the doubling of forestry plantations to meet our climate commitments is done in a more long term sustainable way. To help manage this development we will have to put additional resources into our National Parks and Wildlife services and consider separating the two functions with a new National Parks service taking over the management of Coillte run forest parks. The combined Bord Na Mona and Coillte land estate needs to be managed in a more co-ordinated way recognising that large areas could be designated as part of a new National Parks network.



## Fisheries

We should consider the planning of our sea areas as part of the National Planning Framework. The designation of large marine conservation areas and changes to our fisheries regime to favour inshore fishing fleets over industrial factory trawlers which should allow for an expansion of employment in our fishing ports which could play a significant role in more balanced regional development.

### **4. Where will we live and what types of housing will be needed?**

We envisage a future where homelessness is a thing of the past, where there is widespread state and not-for-profit provision of social and affordable housing in safe and sustainable communities where rents and mortgages repayments are no more than a fifth of the average person's monthly income.

In 20 years time Government will not be so reliant on the private sector for housing supply. Rental options will become more attractive, allowing people security of tenure where necessary and flexibility to move between different housing types which suit people's different stages in life.

The Government currently subsidises the private rental sector by at least €450 million a year under the rent supplement (€267 million), Housing Assistance Payment (HAP) (c. €48 million) and the Rental Accommodation (c. €135 million) schemes. We advocate for the direct building by Government of social and affordable housing, including a new 'cost rental' housing model which provides for a variety of different tenants within the one development and which will reduce the bill we have to pay to support the private rental sector. We believe this is a more cost-effective means of ensuring the housing needs of those currently being priced out of the market.

New building will be concentrated in existing urban centres, allowing for more efficient use of public resources and reduced demand for travel. Developments should be designed to provide for a variety of different household types, including homes for single people and couples, more generous family sized apartments, live-work units and sheltered housing for people in need of support and care in communal as well as private spaces. The design of such new communities should involve the future residents as has been tested in a recent '[nimbleSPACE](#)' development in Callan County Kilkenny.

Because new provision will be in higher density developments within existing urban areas it will be important to ensure that ample space is provided for parks, community gardens, safe spaces for children to play and for public spaces where communities can come together.

In our cities a lot of the space for this new development can come from underutilized land which is in public ownership near bus or train stations, ports, colleges, hospitals and other local authority facilities. Brownfield Industrial sites and low density warehousing facilities close to public transport nodes should be rezoned to allow for new higher density residential development.

In our towns and villages the challenge will be to provide high quality infill development which involves the refurbishment of existing buildings and the development of central sites so that vibrant new communities are created. The deep retrofitting of existing buildings to improve energy efficiency provides an opportunity to also restore such main street buildings for domestic use. Public support for such redevelopments will also be justified by the savings to the public in lowering the cost of delivering health, education, transport and other local services.

## **5. What are the key services that people will need?**

### **Communications**

For over two hundred years the postal service has provided a vital communications role for Irish society. In twenty years time the post office will have been reinvented to become a Government services support centre, a delivery and export point for parcelled goods, a safe storage location for personal data and an independent financial service advisor for the local community.

By 2040 we will have created an open access fibre optic and wireless network which optimises the integrated use of public and private ducting and cable systems. This network will allow different providers to offer a variety of communication services to consumers on a secure, encrypted, cloud-based internet system.

### **Banking**

By 2040 all retail banking services will be provided via online and mobile systems. New regional public banking branch offices will have opened specialising in lending to the small and medium business sector. Saving deposits raised in such regional banks would be recycled as lending in the same region. The branch would have expertise in not-for-profit business lending and would be supported by a centralised Management Information System.

## Energy Advice

The transition to a new clean energy system will involve a switch to the cooperative ownership of energy generation. A network of local 'trusted intermediaries' will be in place to advise householders and local business how they can reduce their own energy usage and create their own power supply.

Local companies will aggregate demand management services for individual householders and businesses to provide balancing capability, voltage and frequency stability for the National Transmission Grid operator. Electricity will provide the main source of power for our transport and heating systems. Car sharing and automated driving will become the norm with public car parks doubling as charging stations.

## Primary Health care

The digital network systems will also support the remote diagnosis and treatment of many medical conditions. Local primary health care units will be at the centre of the care system, triaging the registration and management of patients within hospitals and other health services.

The 'de-congregation' of people with disabilities into new community housing settings will be done in a way which maximises their independence but retains the necessary support and institutional community support that they need. Asylum seekers will similarly be moved out of institutionalised hostel accommodation into community facilities where they are free to take an active part in society pending their applications being considered.

## Sharing Tourism and Leisure Facilities

The development of local greenways will double as community and visitor facilities. Rather than developing large centre based tourism facilities we should be planning to distribute visitors across the island with small scale parking, information displays and other visitor facilities at a wide range of local archeological and historical sites.

We should make better use of our school facilities by allowing local communities use and help maintain sport facilities in local schools during holiday periods to maximise our use and gain from local green spaces.

## Universal Basic Income

We also support a move to a 'Universal Basic Income' and a shorter working week as part of this just transition. This would reward those doing caring work and at the same time free people to become more enterprising in a way that suits their own individual circumstances.

## 6. Where will Ireland fit in a wider (geographical) context?

### Migration

The Brexit process may change the nature of North South relations on this Island and risks the introduction of new restrictions in the travel of goods and people between Ireland and the UK. Given our Island location on the periphery of Europe we are not the first port of call for international migration. The closure of UK borders may however change the patterns of travel for people seeking to enter that country and will raise questions about how we manage movement between the UK and Ireland.

### The Irish Sea

Regardless of the outcome of the negotiations there is likely to be certain areas where co-operation between the UK and the EU will continue to evolve. The European Union is rolling out a new Energy Union plan which is designed to promote new regional electricity markets. Countries will increasingly share power across national borders to help balance an increasingly variable low carbon power supply. The United Kingdom signed up in November to a memorandum of understanding regarding the North Seas Offshore Grid which will facilitate such a regional electricity market in our area.

By 2040 the Irish Sea will be a hub for such an interconnected energy system. Offshore wind will be competitive and introduced at scale, with convertor stations in the Isle of Man transferring power to and from Ireland Scotland, England and Wales. A similar interconnector with France will provide important balancing capability with the rest of the continent.

These electricity interconnectors will also carry fibreoptic cables which will add to the growing digital network connecting the US, Ireland and the UK and rest of Europe. In a post Brexit world we will have to insure the security of this network from both unwanted surveillance and other security threats.

### The North Atlantic

Our National Planning Framework should take account of development of our marine area which is ten times larger than our land space. We are already starting to see changes in the North Atlantic due to climate change and this is likely to become significantly more pronounced by 2040. Melt waters from the Greenland ice sheet have created a body of cold water in the North Atlantic which may affect the working of the Gulf stream and our local climate. We

should designate a large area of our territorial waters as a Marine conservation zone where fishing and exploration activity is prohibited. We should instead deploy new marine research resources to provide a global research capability on every aspect of what is happening in the Atlantic.

## Air and Sea Transport.

As an island nation sea and air access is of critical importance so we should be at the forefront of finding ways of reducing the climate impact of such travel. In the long term if we can electrify the remainder of our land based transport system then the use of biofuels and other more sustainable fuels for air travel may become a viable solution. Shipping companies are already looking at the development of cleaner fuel systems, which we should be investigating on a test and research and development basis.

Our Freight transport system needs to be fundamentally reconsidered. We foresee an expanded rail network predominantly electrified with some hybrid trains, taking an increased share of both freight and passenger traffic. It must be tied in to cleaner highly-efficient shipping. This will not just happen but must be planned for. The possibilities for increased use of rail freight are improving due to technology, particularly the automation of container handling. The NPF must provide for ports and rail depots designed for automated container handling, using rail to get as close to the final destination as possible, with transfer to smaller vehicles at the nearest depot.

## **7. What are the planning responses to key environmental challenges?**

### Environmental Legislation

We are consistently failing to address environmental challenges in the planning system. The requirements of Environmental Impact Assessment and Strategic Environmental Assessment are not being implemented properly in many instances. However, the basic analysis resulting from these processes is sufficient to indicate that the planning decisions being taken, far from addressing the challenges are worsening them.

This is repeatedly evident in relation to climate change and air pollution emissions. For example, the Tuam – Gort motorway was approved despite the fact that it was assessed as leading to a 17% increase in greenhouse gas emissions. Similarly, the Greater Dublin Area Transport Strategy is expected to lead to an increase of emissions of about 10% over baseline.

The Dublin Airport Authority is proceeding with a third runway at Dublin Airport with Government support despite the contribution it will make to growing greenhouse gas emissions from aviation.

It is also evident in relation to water. In the preparation of the OPW's draft Flood Risk Management Plans, compliance with the Water Framework, i.e. achievement of good ecological status, is factored in as one of the issues as opposed to being identified as a legal requirement to be met. In many instances, the OPW's plans will undermine rather than contribute to the achievement of good ecological status of the water bodies affected.

## Mainstreaming Biodiversity and Heritage Protection

Currently our biodiversity is protected by both European and Irish legislation, most particularly the EU Habitats and Birds Directives, the EU (Natural Habitats) Regulations 2011, and the Irish Wildlife Acts (1976 and 2000). The resulting impact assessment procedures have been very helpful in protecting and raising awareness of biodiversity within the confines of these protected areas. However, the requirements of Environmental Impact Assessment and Strategic Environmental Assessment are not being implemented properly in many instances. The basic analysis resulting from these processes is sufficient to indicate that the planning decisions being taken are worsening the problem.

Biodiversity is not confined to 'special areas' such as NHA and EU designated habitats - it is an essential element of all life. Ireland's agri-food economy is dependent on biodiversity, from pollinators to grassland. Our tourism industry is also dependent on our rich flora and fauna and our wellness as a society is dependent on other species. In order to protect the wider network of biodiversity Ireland needs to take the following actions to protect against biodiversity loss in the coming years:

- Ireland must develop and mainstream into all planning procedures a form of environmental impact assessment that protect more than just EU or NHA designated areas but key networks that enhance biodiversity of these areas and cities. These assessments could be developed in line with the ratified Convention on Biological Diversity and its accompanying Cartagena and Nagoya protocols.
- For example, Ireland's hedgerows act as corridors for biodiversity in farming areas. Parks and gardens in cities also encourage biodiversity, birdsong, bees and the production of honey. Ireland's farmers and landowners should be rewarded in planning system for protecting these necessary boundaries and nesting times.
- Biodiversity is at present an under-funded area of work despite its key importance not just for maintenance of everyday life but also its link to our agri-food and tourism sectors. The Green Party call for a localised approach to biodiversity and community education beginning with the appointment and recruitment of at least one biodiversity

officer in every local authority to input into local development plans, local area initiatives and oversee/review planning proposals.

- Respect for pollinators: decrease in pesticides and spread of invasive species must be part of the planning framework through the enshrining of the precautionary principle in the Planning and Development Acts. Planning permissions must restrict harmful pesticide use such as glyphosate and require special procedures to restrict invasive species.
- Increase funding and support for the National Biodiversity Centre so that it can contribute to regular mapping and tracking of data.
- Farmers must be valued for their historical and present contribution to our high levels of biodiversity and heritage protection and beautiful landscapes. Farmers need to be paid well for their good stewardship of the land. This can be done through the mainstreaming of '[High Nature Value Farming](#)' which integrates farmer local expert knowledge with expert environmentalist/agricultural knowledge in an inclusive manner.

## **8. What infrastructure is required – what are the national priorities?**

The National Planning Framework should outline the following as national investment priorities:

- Decarbonisation of our economy in a manner which contributes to Ireland meeting its obligations in the Paris Climate Agreement goal to keep global temperature increases below 1.5 degrees.
- An affordable housing system which prioritises public housing solutions including new rental options providing for a range of different housing needs in the one development.
- Sustainable transport solutions including investment in pedestrian and cycling facilities, greater prioritisation for public transport systems and the introduction of new clean power supplies for private car, freight and air transport modes.
- Increased investment in our water and waste water systems including the roll out of measures to support water conservation, continued domestic metering, remote sensors to measure water quality and an end to the direct discharge of any raw sewerage.
- The expansion of fibre optic or coaxial cable to every Irish household using existing networks, telephone poles and electricity wires as part of an open access collaborative but also competitive telecommunications system.

- The improvement of the public realm through investment in public spaces including new parks and local and national green-way projects.
- Investment in a more diverse farming system, which improves our food security, provides high quality and healthy food to the public and improves the profitability for a younger generation of Irish farmers.

## How do we prioritise?

Prioritisation of specific aspects of the above must be done through the creation of a transparent, independent accountability mechanism to monitor and evaluate sectoral adaptation and mitigation strategies. These mechanisms should be mandated to [incorporate Sustainable Development Goal \(SDG\) principles and targets](#) (for example, [using human rights thresholds as baseline indicators as proposed by the Mary Robinson Foundation for Climate Justice](#)) in their monitoring and evaluation strategies.

A multi-factoral cost-benefit analysis must also be conducted to prioritise and evaluate objectives using human rights thresholds and the SDG principles as a basis for action. In guiding such cost-benefit analysis there should be a climate test for any new infrastructure investment. For example the only major road infrastructure which could validly be included in the plan are proposals whose design would lead to a decrease in greenhouse gas emissions compared both to current emissions and to business as usual.

## 9. How should a National Planning Framework be implemented?

The Approach to addressing Long-term challenges set out in section 1.2 of the Government's own Programme for a Partnership Government provides a useful outline as to how the National Planning Framework might be best advanced.

If this public consultation process is to work effectively there has to be a genuine commitment to allowing local communities and elected representatives become involved. That process of engagement can also overlap with the proposed National Dialogue on Climate Change which should take place in tandem with Planning Framework process.

It will also be critical that the imminent review of the Capital Plan provides a mechanism for the outcome of the National Planning Framework to inform Government decisions on the allocation of future funds. The plan will fail unless there is a clear change in the mindset and economic



analysis of the Department of Public Expenditure and Reform and the Department of Transport around the merits of investing in more sustainable systems.

The National Economic and Social Council could also become involved in the process. Consideration of the issue should not take place in the traditional formal setting, where each pillar organisation presents their position via selected representatives but rather through a more flexible process, where a variety of interested parties can be brought together to consider specific aspects of the plan or particular obstacles that may arise in its progression.

The Oireachtas will also have to have a real engagement in the framework if it is to be successful. Responsibility for engaging with the framework should not reside with one committee and the critical first task for the Dail might be to consider what legislative changes may be needed in Regional and local Government structures and responsibilities.

## **10. What will success look like?**

Success in this project should have immediate effect in providing greater confidence behind investment decisions on new housing and transport developments, thus reducing the cost of capital for those projects. The success of the plan will only become apparent in the long term via a change in the statistics captured in our census returns and EPA indicators. They should reveal a reversal in the long term trend towards increasing commuter distances, an end to the growth of new 'one off' housing in large 'doughnut' conurbations on the outskirts of our major cities, a reduction in our CO2 emissions and an improvement in our local water and air quality.

Success will also be measured by the extent in which this plan enables our public service to operate in a more flexible and innovative manner. A key outcome should be a change in the nature of our public consultation with local communities and a modernisation of regional and local government structures to make them fit for purpose.

Last but not least the planning framework should provide us a chance to change the very indicators we use to measure what we see as success.