
SUBMISSION ON

IRELAND 2040: OUR PLAN

National Planning Framework

NOVEMBER 2017

Introduction

An Fóram Uisce (the Water Forum) was launched in April 2017. With the forthcoming enactment of the Water Services Bill 2017, An Fóram will be the only statutory body representative of all stakeholders with an interest in the quality of Ireland's water bodies. An Fóram consists of 27 members including representatives from a wide range of organisations with direct connections to issues relating to water quality and also public water consumers. Approximately 50 different organisations were involved in the nomination of members.

In representing the various stakeholders, An Fóram has commenced engaging with the agencies and departments who have responsibilities under the Draft River Basin Management Plan for Ireland (2018 – 2021) as well as the wider water community. This will result in improved understandings and enable the emergence of a common policy platform on particular catchment management issues and on the overall area of water services-drinking water and waste water treatment.

Overview of the National Planning Framework

An Fóram wishes to welcome the publication of *Ireland 2040: Our Plan* (hereafter the Plan) and the work to date in regard to drafting same. The publication comes at a time where there is a high level of concern within An Fóram at the vulnerability and overall fitness for purpose of Ireland's water services infrastructure; at the ongoing risk of catastrophic breakdown of services to large urban population centres; with the challenge of addressing the poor quality of a major proportion of Ireland's ground water bodies and with the need in a general sense to reconcile the economic, spatial and planning aspirations of Irish society with the needs of maintaining a high quality aquatic environment.

It is reasonable to state that all the targets/projections in the Plan have major implications both for water quality and water services. Of particular note here are the following projections:

- Population increase of almost one million people, bringing the total population to around 5.75 million by 2040
- An additional half a million new homes by 2040
- An additional 660,000 jobs by 2040.

It is clear, as the Plan acknowledges, that significant investment will be required in a whole range of infrastructural and other areas to accommodate and realise these changes.

An Fóram notes the analysis of the Expert Group which suggests that in a 'business as usual' scenario, these developments would lead, *inter alia* to 'degraded environment with, the loss of farmland and habitat to predominantly greenfield development and increased risk of groundwater pollution.'(p.25). An Fóram also supports the objective as specified in the vision for 2040 of

‘sustainable self-reliance based on a strong circular economy and significant progress towards a low carbon, climate –resilient society while remaining an open, competitive and trading economy.’

In considering the circular economy agenda, An Fóram is mindful of the messages of concern about future food security coming from the European Sustainable Phosphorus Platform. There is a growing acceptance that the phosphorus we depend on as a fertilizer for crops is finite. Rather than simply treating waste water to remove phosphorus as we are doing at present – we need to recover and recycle it in a safe manner to grow crops sustainably for our growing population in the future. We therefore welcome the EPA funded research work: *“Identification and evaluation of phosphorus recovery technologies in an Irish context”* (Number 189).

Whatever about the merits of this as an aspiration, one must have concerns that the strategy is silent on the challenges of reconciling objectives which up to now have frequently been at odds with one another. An open, trading economy with a global reach and a high dependency on economic sectors which are somewhat ‘landscape dependent’ as for instance in the case of afforestation, agriculture and food and tourism will inevitably be faced with developmental constraints imposed by climate change, soil or water quality considerations.

An Fóram considers that these matters need to be foregrounded in the final Plan. This means that they are accorded a central position, not merely as considerations which must be addressed but, as fundamental parameters within which all other objectives must sit.

From An Fóram’s perspective, therefore, it is against such a parameter that the debate on population concentration or dispersal needs to be approached. It is reasonable to suggest that quality water services and the protection of ground water are easier achieved in concentrated rather than in diffuse rural settings. The identification and management of diffuse pollution of rivers and lakes is much more problematic in dispersed rural settings. An Fóram is mindful of the concerns and challenges associated with one-off housing in the open countryside in the context of the delivery of all services including water - notwithstanding the pioneering work of the group water sector in this regard over many years. It is also mindful of the need to weigh these considerations within the context of the social and economic needs of rural populations. This is a most challenging issue and needs to have specific attention in the Plan. While An Fóram considers that, on balance, the preferential focus for population growth is in rural towns and villages, there will always be some need to provide for limited development in the open countryside as a result of economic necessities. Where this arises, it is important that the developers carry the economic cost of the provision of infrastructure, including water and waste water services, associated with their developments and also the costs of ongoing compliance and independent certification of such compliance with the highest environmental standards with regard both to waste water treatment and water abstraction.

Similarly, An Fóram welcomes all efforts to limit urban sprawl on to green field sites. The destruction of farmland, biodiversity and wild life for housing, industry and roads is at variance with climate resilience targets and with self-managing eco system goals.

Draft River Basin Management Plan for Ireland (2018 – 2021)

Against this background An Fóram notes the Plan's observations regarding rural Ireland, specifically where it observes that *'the authenticity of Ireland's clean green image is rooted in the landscape of rural Ireland. In combination with a strong sense of community and place, Ireland's rural areas support the fundamental assets upon which critical sectors such as food production, tourism, amenity activities, bloodstock, energy production and small scale manufacturing are based. The enhancement and promotion of these unique and distinct assets are critical to planning for Ireland's future.'*(p64)

An Fóram readily accepts this proposition. It is surprising, however, that the Plan makes no reference here to the recent publication of the Draft River Basin Management Plan for Ireland (2018 – 2021) or indeed to the impending publication of the Final Plan. If An Fóram is to have confidence in the joined up governance requirements necessary to underpin a comprehensive approach to tackling the water quality issue, it would expect to see the issue of catchment protection and the requirements of the Water Framework Directive being prominently flagged in this spatial strategy.

The concept of the bio-economy may well be an important element in quality maintenance and protection in Ireland's water bodies. An Fóram welcomes the Plan's support for this sector and notes its relevance in particular for rural and coastal communities where economic opportunities are limited. An Fóram would welcome the establishment of an Expert Group to further elaborate on the potential of this sector; on the economic opportunities which it presents; on how best to unlock these opportunities and on the potential contribution of the sector to meeting Ireland's climate change and water quality goals.

While the NPF supports the on-going development of aquaculture, there is a view within An Fóram that the Plan does not sufficiently acknowledge the potential conflict between some aquaculture activities, namely offshore salmon farming, and Ireland's obligations to salmon conservation under the Habitats Directive. Wild stocks of Atlantic salmon are currently vulnerable because of reduced marine survival in the North Atlantic. There is growing concern that expansion of salmon farming as currently practised in net cage systems, has the potential to endanger wild salmon stocks as result of interbreeding of escaped farm and wild salmon, and sea lice infestations. Concern has been expressed within An Fóram that, if this is in fact the case, current conventional salmon farming systems may be an example of a practice that could compromise the NPF vision of a sustainable bio-economy.

An Fóram welcomes the commitment in the Plan to the protection of Ireland's coastal resource, both in terms of its physical character and environmental quality. Issues of coastal flooding, sea level rising and the deteriorating quality of estuarine waters represent pressing and immediate concerns for coastal communities and, by extension, for the country as a whole.

With regard to the issue of sustainability, An Fóram shares the view of the *'key national environmental challenges'* as the *'need to accelerate action on climate change, health risks to drinking water, treating urban waste water, protecting important and vulnerable habitats as well as diminishing wild countryside and dealing with air quality problems in urban areas'*(p108).

While welcoming this recognition of the need for action on these areas An Fóram is concerned with the rather general commitment on water quality enunciated here-namely that the 'links and ongoing challenges between development activity, water quality and our health' would be recognised. Considering Ireland's commitments on water quality within the EU's Water Framework Directive there is little apparent urgency or conviction in this recognition. Where the Plan makes explicit reference to river basin management, its primary focus is on flood risk and development on flood plains. This is an important aspect of river basin protection but only one such aspect.

An Fóram notes the commitments in the Plan to the development of a low carbon economy and to integrating climate considerations into the planning process. It considers however that the Plan needs a much more active focus on the known and as yet unknown risks of climate change; on the ongoing erosion of biodiversity; on peak oil; on ocean acidification ; on the deteriorating quality of the marine and fresh water resource in Ireland and on the challenge of maintaining a safe drinking water supply. The relentless and gathering pace of some of these developments not only present development challenges but define the limits of such development and pose fundamental development risks in the immediate and long term future.

An Fóram is also concerned with regard to the level of engagement with citizens in relation to the many important elements of the NPF. It is appreciated that effective citizen engagement can present significant challenges. However, if we are truly committed to the ideals of positive change in terms of our planning framework, the views of citizens must be elicited and actively accommodated. Recent examples provided through the Citizen Assembly might be of use in this regard.

Conclusion

An Fóram Uisce considers that draft National Planning Framework presents an opportunity to provide a considered and balanced framework for the future development of this Country. The challenges associated with such a framework are many in the context of balanced regional development, equitable distribution of investment and resources and an opportunity for all to benefit from future development.

All of these aspirations must be fore-grounded in the absolute need to protect and restore the quality of all our waters - rivers, lakes, coasts and also groundwaters. These requirements, which are provided for statutorily in the Water Framework Directive, must be centre stage in the context of all decisions with regard to land use planning and development planning & control.

An Fóram considers that the Draft NPF requires strengthening in relation to these requirements and that the considerations with regard to the Water Framework must be explicit.

It is appreciated that the challenges are great but equally, it is fully understood that the development of our economy impacts upon and is itself impacted by the well-being of our built and natural environment and the well being of human health. All are inextricably linked. All are all individually and collectively at stake.

An Fóram hopes that its views will be of assistance in finalising the NPF. Having regard to its status in the context of the Water Framework Directive, An Fóram is requesting that consideration be given to facilitating a greater level of engagement with it in relation to the NPF and wishes to advise that it is available for this purpose on an on-going basis.

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