An Taisce
The National Trust for Ireland

Department of Public Expenditure and Reform
Government Buildings
Upper Merrion Street
Dublin 2

Sent by email to: reviewtorenew@per.gov.ie

28th January 2021

Re. Review to Renew: Review of the National Development Plan

To Whom It May Concern,

An Taisce welcomes the opportunity to comment on the review of the National Development Plan (hereafter referred to as the Review or NDP Review). We wish to make the following submission.

1. Overarching concerns

1.1 Format of the consultation

We have endeavoured to format our submission in line with the questions posed in the Review to Renew document in so far as is possible, however, we consider the consultation format to be far too restrictive to allow for a substantive public consultation. While we recognise that sectoral policy strategies and individual projects will be subject to separate consultations, we do not consider that the format of this consultation facilitates a meaningful review of the National Development Plan (NDP).

The format does not reflect the integrated approach to expenditure needed to "*support economic, social, environmental and cultural development all across the country*", as is stated in the consultation document, while also addressing the climate and biodiversity emergencies. For instance, An Taisce considers that the approach taken in Section 3 of the consultation document with regard to the Strategic Investment Priorities (SIPs) is un-integrated and therefore inappropriate. The document asks respondents to rank the SIPs in order of priority yet wholly fails to acknowledge or interrogate the interconnections between them.

Furthermore, there is a dearth of information in the consultation document on current and proposed expenditure. Aside from the figures provided in the table on page 8, there are only two very high level pie charts. We note that the document refers readers to the website

https://whereyourmoneygoes.gov.ie/en/, and while this does provide additional information, that data should be provided in the consultation document itself. Moreover, the website still does not provide enough granularity to enable a meaningful evaluation of capital expenditure and the allocation of the capital budget.

1.2 Programme for Government

The introduction to the consultation document states the NDP is being reviewed to, among other things, "*better reflect the major priorities set out in the new Programme for Government*". However, nowhere in the document are those priorities discussed (beyond brief mentions) or the key targets outlined so that the expenditure proposed in the NDP can be assessed against them.

In particular, we would highlight that the Programme for Government's cornerstone climate target to reduce greenhouse gas emissions by 7% annually year on year, is not referred to anywhere in the Review.

We would also highlight the commitment in relation to new transport infrastructure that: "*the Government is committed to a 2:1 ratio of expenditure between new public transport infrastructure and new roads over its lifetime*." This is also not reflected anywhere in the consultation document.

1.3 Sustainable Development Goals

The Review document systemically fails to address the United Nations' Sustainable Development Goals (SDGs), which Ireland has adopted. The SDGs and their 169 specific targets is the most appropriate framework for measuring actions and outcomes and should be included in the NDP Review.

1.4 Lack of consideration of biodiversity

We note that while the NDP Review does at least touch on the need for climate action, it makes no mention of the current biodiversity crisis. In May of 2018 the Dail declared a biodiversity and climate emergency, and the most recent Article 17 report[1] by the National Parks and Wildlife Service indicated that 85% of European protected sites are in unfavourable conservation status. These are the very habitats which provide us with clean water and air, pollinators, carbon sequestration and flood retention, to name just a few of

[1] https://www.npws.ie/publications/article-17-reports/article-17-reports-2019

the ecosystem services they provide. In addition, one third of Irish bee species are threatened with extinction by 2030, with serious consequences for pollination of crops.

Climate change and biodiversity are inextricably linked. Terrestrial and marine ecosystems currently absorb roughly half of man-made carbon emissions. Biodiversity and healthy ecosystems are essential to mitigate against climate change, yet climate change is irrevocably damaging those same systems and species. The protection of our biodiversity is a cost-effective and logical way to mitigate against the impacts of climate change. Failure to protect our biodiversity and the further descent into the ongoing mass extinction will inevitably lead to an ecological tipping point, whereby our natural systems will no longer function as a mitigant for climate change, and we will have lost our main means of combating our rising carbon levels.

2. Is the overall level of public spending on capital investment correct?

No quantified answer is possible until the Department of Public Expenditure and Reform (DPER) demonstrates that the evidence base of the NDP is aligned coherently with Ireland's climate change commitments and the commitments under the UN SDGs. As a matter of urgency DPER; the Department of Environment, Climate and Communications; and the Department of the Taoiseach must show that the NDP is aligned with Ireland's fair share responsibility under the Paris Agreement and the 2020 Programme for Government's cumulative carbon budget for 2021-2030, as well as the SDG targets. These emissions limits constrain the total inputs of fossil fuels to energy (transport, industry, heating, electricity), limestone to cement manufacturing and reactive nitrogen inputs to agriculture.

The NDP evidence basis is given as the 2017 IMF PIMA Ireland report, the IGEES Report and the 2017 Review of the Capital Plan 2016-2021. None of these reports state that Ireland's cumulative carbon budget over any period related to the NDP is limited within Ireland's fair share Paris carbon budget, therefore they fail to set a science or equity-aligned context for the NDP. The Programme for Government sets out the 2021-2030 cumulative emissions context, and scientific studies indicate Paris-aligned carbon budgets. These constrain inputs of total fossil fuel carbon energy and reactive nitrogen to agriculture. No assessment of public spending can be adjudged until DPER can demonstrate how the NDP and Project Ireland 2040 investment are coherent with Ireland's climate targets and obligations under the SDGs.

3. What types of capital investment should be prioritised?

As noted above, An Taisce considers the ranking of expenditure priorities to be an oversimplified approach and one that is premature until DPER has shown that the overall capital budget is assessed against Ireland's climate targets. We have tried to address the issues raised in the Strategic Investment Priority categories provided in the consultation document, however, the order in which they appear below should not be taken as a ranking.

3.1 Cross-sectoral integration of climate and biodiversity

The "climate challenge" is acknowledged in the Review, as is its cross-sectoral nature, yet it is nevertheless treated as a standalone issue - the other Strategic Investment Priorities do not address it. As previously mentioned, the emissions reductions targets laid out in the Programme for Government and Ireland's fair share responsibility under the Paris Agreement, which will require action and investment across all sectors, are not discussed in the document, even under the Climate Action SIP. Similarly, as discussed in Section 1.3 above, biodiversity is left out entirely. Addressing the climate and biodiversity crises should underpin the capital expenditure strategies across all sectors and be integrated throughout.

Successful integration would allow such things as the benefits of peatland and wetland restoration for both flood alleviation and carbon sequestration to be realised, in addition to the biodiversity and water quality benefits. The capital investment framework budget for the OPW from 2016-2021 is €789 million. If a certain percentage of the funds earmarked for the arterial drainage works and capital flood relief schemes was invested instead in habitat restoration, including peatland restoration, and wetland conservation and creation, then multiple-benefits could be realised. These types of synergies and co-benefits are being lost due to lack of integration.

3.2 Water services

A growing body of evidence makes it clear that Ireland is currently failing to fulfil its legal obligations with respect to water quality and water treatment[2,3,4]. Indeed, in March 2019 the European Court of Justice ruled against Ireland (Case C427-17)[5] for failure to comply with the requirements of the Urban Waste Water Treatment Directive (91/271/EEC) as Ireland

[2] EPA (2020) Water Quality in 2019: https://www.epa.ie/pubs/reports/water/waterqua/waterqualityin2019-anindicatorsreport.html
[3] EPA (2020) Urban Waste Water Treatment in 2019: https://www.epa.ie/pubs/reports/water/wastewater/urbanwastewatertreatmentin2019.html
[4] EPA (2020) Ireland's Environment: An Integrated Assessment 2020: https://www.epa.ie/pubs/reports/indicators/irelandsenvironment2020.html
[5] Case C427/17: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:62017CJ0427

had failed to put in place compliant wastewater collecting systems to tackle excessive spills from storm water overflows and failed to provide adequate treatment of urban waste waters. This situation has yet to be resolved, with multiple locations releasing untreated sewage into bays around Ireland. While this falls under the remit of Irish Water, the capital works need to be adequately funded to upgrade the infrastructure. It is unjustifiable that this level of basic human sanitation would not be an absolute priority in any modern country.

3.3 Transportation: National road network, public transport and active travel

Any further investment in motorway or dual carriageway schemes, other than necessary maintenance and small-scale bypasses to relieve urban congestion points, would be a misdirection and misspending of limited public money and would undermine efforts to increase the sustainability of our transport systems and reduce transport-related emissions. As evidenced by the table on page 8 of the consultation document, transport expenditure is still heavily weighted towards carbon-intensive travel and the expansion of the road network, which will increase dependence on private car use. To achieve any demonstrable progress towards sustainable mobility objectives, this balance must fundamentally shift to prioritise investment in active travel and public transport. As such, further infrastructure investment in roads (outside of road infrastructure maintenance) to serve energy inefficient and emission-generating private motorised vehicles is untenable.

The Review makes no mention of any capital expenditure to be directed toward expanding and improving safe cycling and pedestrian infrastructure. Significant amounts of existing road space needs to be reallocated for high quality segregated cycle lanes and footpaths and all new development must include such infrastructure. This requires a significant allocation of funds.

An Taisce recognises that the various funding streams of the NDP do broadly allocate funds to sustainable mobility. However, these are not commensurate with the dedicated allocations for road infrastructure. We would reiterate that the Programme for Government commitment to the 2:1 ratio of expenditure between new public transport infrastructure and new roads over its lifetime needs to be addressed in the NDP Review. As shown by the data in the table on page 8, this will require turning the current model of transport investment on its head. It is imperative that such a substantial change be addressed in the NDP review.

It should be noted that this need for prioritising investment in sustainable transport over road expansion was also resoundingly upheld by the Citizens' Assembly on climate change in 2017. 92% of Citizens' Assembly members recommended that the State should prioritise the expansion of public transport and cycling spending over new road infrastructure spending at

a ratio of no less than two-to-one to facilitate the broader availability and uptake of sustainable transport options with particular attention to rural areas.

3.4 Housing and sustainable urban development

While the Review mentions the need for compact development, it has not adequately addressed the need for integration between expenditure on housing and expenditure on sustainable transport. The need for investment in housing development which encourages a shift away from car-orientated urban patterns to walkable, cycleable, and transit-orientated development patterns must be included in the NDP Review.

Additionally, the Programme for Government commits to "*Delivering a National Aggregated Model of Retrofitting reaching over 500,000 homes by 2030, as part of the EU Renovation Wave.*" The need for capital expenditure on housing retrofitting, and specifically this Programme for Government commitment, requires consideration in the NDP Review.

3.5 Airports

Greenhouse gas emissions from aviation account for approximately 4.9% of global anthropogenic emissions. Crucially, they have more than doubled in the past two decades and increased by 26% in Europe in the past five years. At current growth levels, aviation emissions could as much as triple by 2050; this would consume 25% of the total global carbon budget for a scenario where warming is limited to 1.5 degrees as per the Paris Agreement[6].

Further expenditure on airport expansion is therefore not in line with Ireland's greenhouse gas reduction commitments and would undermine binding emissions targets. The NDP Review fails to address the extent to which aviation emissions must be reduced to meet national and international climate targets. Consideration should be given instead to capital investment in alternatives to air travel such as high-speed ferries and rail links that could provide a lower-emissions substitute for many short-haul flight routes.

3.6 Ports

An Taisce fully recognises the need for continued investment in ports, particularly in light of Brexit. However, current models of continued increases in tonnages passing through Irish ports and any capital expenditure on port infrastructure need to address sustainability

[6] Data from Transport and Environment: https://www.transportenvironment.org/

constraints. In order to address the challenges posed by climate change, a significant number of existing import and export cargo tonnages will need to be reduced:

- Imports of coal, oil, biomass, and animal feed need to be reduced in order to meet climate targets;
- Grain, vegetable and fruit imports need to give way to more home produced plant based foods;
- Bovine animal exports need to be reduced; and
- Peat compost exports need to be eliminated.

Furthermore, the NDP Review does not acknowledge the connections between ports and the demand for land transport for haulage. Capital expenditure on road freight to and from ports should be re-directed towards expanding rail freight capacity. For example, rather than pursuing the currently proposed dual-carriageway link from the Shannon-Foynes port to Limerick, investment should instead be directed towards restoring the existing but unused Limerick to Foynes freight rail line.

4. How can the management and governance of public investment be improved?

The consultation document states the following in relation to assuring value for money in public investment:

> *"Informed by leading international practice, the Department is also developing a new governance and assurance process for major projects with an estimated cost of over €100 million. It will involve an independent external review of major projects at key stages focusing on robustness of planned delivery, accuracy of cost forecasts and consideration of risk."*

The proposed governance and assurance process and the independent external review process should both be subject to public consultation prior to finalisation. Furthermore, *all* capital expenditure projects should be subject to an assessment of their greenhouse gas emissions impacts as part of the review process. This must not be limited to projects costing over €100 million. Such an assessment must account not only for emissions directly generated by the project but a whole lifecycle analysis of emissions and include an assessment against Ireland's binding climate targets.

5. Conclusion

On the basis of the lack of data provided, the overarching failure to evaluate the NDP and capital expenditure against Ireland's climate obligations, and the failure to provide an integrated and detailed assessment of the Strategic Investment Priorities, An Taisce submits that this Review is wholly inadequate to inform a national capital investment programme for the next decade.

Please acknowledge this submission and inform An Taisce of any further consultation periods.

Yours sincerely,

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