An Taisce
The National Trust for Ireland

and endorsed by

Environmental Pillar
Working for a sustainable future

Submission to the Draft National Planning Framework November 10th 2017

Contacts:

Ian Lumley, Advocacy Officer, An Taisce, Tel: 01 454 1786 advocacy@antaisce.org

Michael Ewing, Administrator, The Environmental Pillar, Tel: 086 867 2153
michael@environmentalpillar.ie

An Taisce

An Taisce is a charity that works to preserve and protect Ireland's natural and built heritage. We are an independent voice for the environment and for heritage issues. We are not a government body or semi-state agency. Founded in 1948, we are one of Ireland's oldest and largest environmental organisations.

The Environmental Pillar

This submission was developed using the Environmental Pillar processes but is not necessarily the policy of each member group in the pillar.

Environmental Pillar members: An Taisce. Bat Conservation Ireland. BirdWatch Ireland. CELT - Centre for Ecological Living and Training. Coast Watch. Coomhola Salmon Trust. Cultivate. ECO-UNESCO. Feasta. Forest Friends. Friends of the Earth. Global Action Plan. Gluaiseacht. Good Energies Alliance Ireland. Green Economy Foundation. Green Foundation Ireland. Hedge Laying Association of Ireland. Irish Peatland Conservation Council. Irish Seed Saver Association. Irish Whale and Dolphin Group. Irish Wildlife Trust. Native Woodland Trust. Sonairte. The Organic Centre. VOICE. Zero Waste Alliance Ireland.

INTRODUCTION 4

1.0 STRATEGIC ENVIRONMENTAL ASSESSMENT 4
2.0 HIGH LEVEL OBJECTIVES 6
2.1 The Global Context 6
2.2 UN Sustainable Development Goals 7
2.3 Key Principles 9
3.0 KEY ACTIONS 11
3.1 Climate 11
3.2 Irish Biodiversity 14
3.3 River Basin Management 15
3.4. Health and Well Being 15
3.5 Air Quality 18
4.0 DEFINING OBJECTIVES 20
4.1 Defining targets and timetables for the 70 National Policy Objectives 20
4.2 Regional Population and Housing Location Targets for Urban Development 20
4.3 Rural Housing Provision 21
4.4 Sustainable Communities 22
5.0 INTEGRATING SUSTAINABILITY 23
5.1 Climate Action 23
5.2 Food and Agriculture 24
5.3 Transport 25
5.4 Cultural Heritage - Landscape, Archaeology and Architectural Heritage 27
6.0 NORTHERN IRELAND 28
7.0 THE STRATEGIC OUTCOMES 30
1. Compact Smart Growth 30
Recommendations 31
2. Enhanced Regional Accessibility 31
Recommendations 32
3. High Quality International Connectivity 32
Recommendations. 32
4. Sustainable Mobility 33
Recommendations 33
5. A Strong Digital Economy 34
Recommendations 34
6. Empowered Rural Communities 34
Recommendations 35
7. Enhanced Urban Amenity 35
Recommendations 35
8. Transition to Sustainable Energy 36
Recommendations 36
9. Sustainable Management of Water and other Environmental Resources 36
Recommendations 36
10. Access to Quality Childcare Education and Health Care Services 36
Recommendations: 38
8.0 IMPLEMENTATION AND GOVERNANCE 39
9.0 CONCLUSION 39

SUBMISSION ON SEA ENVIRONMENTAL REPORT 40

Evaluation of RPS Environmental Report on Strategic Environmental Assessment (SEA) of Draft National Planning Framework 40

Introduction

The National Planning Framework is the overriding strategy for Ireland's future sustainable development. It sets out the policy objectives and public investment supported outcomes to accommodate an increase in national population to the level of one million to 2040, as well as catering for the existing aging population in a world facing increased climate change impact and biodiversity loss.

It is essential that the NPF acknowledges a global environment of increasing climate impact and ecological destruction. The Earth is currently in the midst of a climate crisis and sixth mass extinction event as a consequence of overconsumption, which scientists have repeatedly warned threatens the very survival of human civilisation, with just a short window of time in which to act[i]. It poses the challenge of accommodating the projected increase in the State's population by 2040 in a way that advances national well-being and quality of life, while at the same time enhancing biodiversity and meeting national and planetary constraints in respect of climate impact and resource use. It requires clearly stated, implementable and legally enforceable targets to meet these objectives, in tandem with Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA).

The major positive feature of the Draft NPF is its proposed integration with 10 National Strategic Outcomes (NSO) through the proposed National Investment Plan (NIP) 2018-2027.

1.0 STRATEGIC ENVIRONMENTAL ASSESSMENT

The Need for a Revised Strategic Environmental Assessment for the National Planning Framework

Unlike the National Spatial Strategy (NSS) 2000 which has no legislative basis and which predated the implementation of the SEA Directive, the NPF and its integration with the National Investment Plan (NIP) is subject to Strategic Environmental Assessment (SEA) under the SEA Directive 2001/42/EC.

Article 5 of the Directive prescribes the information for the SEA *"Environmental Report"* in conjunction with Annexes I and II. In particular Annex 1(g) requires setting out of:

"The measures envisaged to prevent reduce and as fully as possible offset any significant adverse effects on the environment in implementing the plan or programme"

Article 10 requires that:

"Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action"

The compliance of the Draft NPF SEA Environmental Report with the requirements of the SEA Directive needs to be assessed and validated.

The Environmental Report states that all of the environmental topics listed in the SEA Directive were scoped in for the assessment of the plan namely: *"Biodiversity, flora and fauna population human health, soil, water landscape air climatic factors, material assets and cultural architectural and archaeological heritage"*

The implementation failure lessons from the NSS needs to be addressed. These are summarised Section in 1.1 of the Environmental Report which states that *"some of the key ambitions of the NSS have not been realised with development driven planning and sprawl continuing to be prevalent*"

If the NPF is to avoid repeating the failure of the NSS, it must be based on a rigorous and legally compliant SEA, with its objectives and outcomes integrated with the National Investment Plan (NIP)

The core failure of the draft is its lack of integration with the level of climate action, biodiversity enhancement, sustainable resource management, and land use and transport planning, required for a targeted one million increase in population.

This is due in large part to the deficiency of the SEA accompanying the draft. The SEA fails to define adequate objectives, targets and indicators in Table 6.1. The specific measures - or, where stated, targets in the SEA monitoring programme in Table 9.4 - are not fit for purpose (e.g. there are no modal share travel targets for work-based travel). The summary assessment in Table 8 of the majority of measures proposed in the draft NPF being *"broadly positive"* is not justified, since clear sustainability targets and mitigation are not provided for most of the objectives.

If the NPF is to meet the legal requirements of the SEA Directive it must identify an effective level of environmental objectives with commensurate mitigation targets. If the draft NPF were to proceed on the basis proposed, it would be exposed to legal action at national and EU level.

The draft NPF as proposed needs a substantially revised SEA and application of timetabled and percentage based targets for the stated:

- 4 High Level Objectives
- 70 National Policy Objectives
- 10 National Strategic Outcomes through the proposed National Investment Plan 2018-2027

Recommendations:

1. **The implementation of the NPF needs to be legally effective, based on measurable targets, be subject to periodic review and corrective action if targets are not being met or need to be updated, and be subject to the fullest possible application of Aarhus Convention rights and obligations.**
2. **The SEA needs to identify, address and make concrete proposals for mitigation of climate impacts, reversal of biodiversity loss, deterioration in quality of life and general resource management sustainability to meet quality of life and wellbeing objectives.**

Failure to carry out an effective SEA and put adequate monitoring and remedial action in place would expose Ireland to legal action at national and EU level.

Attached as part of this submission is a critical evaluation of the Strategic Environmental Assessment (SEA), Environmental Report pm the NPF.

2.0 HIGH LEVEL OBJECTIVES

Redefining the National Planning Framework High Level Objectives to Embrace Sustainability and Climate Action

2.1 The Global Context

Redefinition is required for the High Level Objectives of the NPF to ensure full integration with the provisions of the:

- Paris Agreement and Climate Action and Low Carbon Development Act 2015 in climate mitigation and adaption;
- UN Biodiversity Convention;
- EU Directives and targets on biodiversity, water, waste and marine; and
- UN Sustainable Development Goals (SDGs) 2015

This requires an overriding principle of integrating climate action and SDG delivery in the four High Level Objectives which are set out under the heading "*What Success Looks Like - Objectives and Vision*" for the NPF:

1. "*In addressing future change Ireland will continue on a path of economic environmental and social progress improving prosperity, sustainability and well-being ...*"

2. *"... an emphasis on improving economic output and stability as well as quality of life, environmental performance and liveability*" of all areas

3. *"setting out* […] the *spatial pattern required for effective and co-ordinated investment to best accommodate and support that change*"

4. *"Putting in place strategy for sustainable development through planning, investment and implementation*"

The overriding framework of Climate Action targets and SDGs requires integration with the eight further vision statements set out on page 27 of the draft NPF.

In particular Objectives 7 and 8 need to be reconciled and integrated:

7. *"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"*

8. *"To be the most successful, advanced and environmentally sustainable economy and society in Europe"*

The entire philosophy underpinning the Draft NPF is predominantly that of national economic and population growth. It is An Taisce's considered opinion that, in the context of current global environmental challenges, this is the wrong perspective and simply accords to the dominant neoliberal vision that there is no alternative path to social progress and prosperity, other than through promoting growth. As Pope Francis writes in his Encyclical, *Laudato Si*:

> *"The idea of infinite or unlimited growth, which proves so attractive to economists, financiers and experts in technology . . . is based on the lie that there is an infinite supply of the earth's goods, and this leads to the planet being squeezed dry beyond every limit"*

The NPF should be a progressive tool for defining a core set of spatial principles for allocating resources and developing a human environment consistent with the overarching meta-governance challenge of the coming century, emphasise the need to rapidly decarbonise and to reduce greenhouse gas emissions by at least 80% by 2050 in order to avoid the worst impacts of anthropogenic global warming and be a tool for fostering environmental, social and spatial justice in adapting to the inevitable consequences of climate change and resource depletion.

It is An Taisce's submission that the Draft NPF, as presently framed, is radically reactionary, lacks foresight and manifestly fails to anticipate the scale of the fundamental socio-spatial changes which will be needed to address the challenges. *We are currently planning in climate change; it's manifest, it's happening* The foreword states '*in 2040 . . . we are likely to be facing increased environmental and climate pressures*' This fails to recognise the current and near-term impacts which are happening and imminent. The existential dangers posed by our continued failure to wean ourselves off our addiction to fossil fuels cannot be overstated. The scientific evidence for the urgency of the need to construct new ways of living is clear. This will involve us fundamentally re-thinking our buildings and settlements, how they are configured and how we move among them. Given the time-frame involved, this NPF represents our last opportunity to initiate this change on our terms.

2.2 UN Sustainable Development Goals

World leaders adopted at the 70th UN General Assembly on 25 September 2015 a new global sustainable development framework: the 2030 Agenda for Sustainable Development (hereafter the "2030 Agenda") having at its core the Sustainable Development Goals (SDGs)[ii]. The 2030 Agenda is the blueprint for global sustainable development with all countries having a shared responsibility to achieve the SDGs.

A number of the UN 17 SDGs and their related targets, are clearly relevant to improving human health, reflecting a strong relationship between good health and sustainable living. Of particular relevance are Goals 3 and 11 which provide for '*ensuring healthy lives and promote wellbeing for all at all ages'*; and '*making cities and human settlements inclusive, safe, resilient and sustainable'*, respectively.



In response to the 2030 Agenda, the European Commission issued a Communication on '*Next Steps for a Sustainable European Future: European Action for Sustainability*'. The Communication shows the significance of the SDGs for Europe and explains how the EU contributes to reaching them and provides the new policy framework on sustainable development in the EU. It also announces a detailed regular monitoring of the SDGs in an EU context from 2017 onwards, and the development of a reference indicator framework for this purpose. The indicator set is structured along the 17 UN SDGs and includes 100 different indicators.[iii]

Having regard to health and wellbeing, relevant EU SDG Goals and corresponding Indicators include:

Goal 3: Ensure healthy lives and promote well-being for all at all ages	
Indicators:	Death rate due to chronic diseases
	Obesity rate
	People killed in road accidents
	Urban population exposure to air pollution by particulate matter
Goal 11: Make Cities and human settlements inclusive, safe, resilient and sustainable	
Indicators:	Distribution of population by level of difficulty in accessing public transport
	People killed in road accidents
	Urban population exposure to air pollution by particulate matter
	Share of collective transport modes in total passenger land transport

The 'Next Steps for a Sustainable European Future: European Action for Sustainability' highlights that "*The Sustainable Development Goals can only be attained successfully at EU level and by its Member States if new policies take into account sustainability and policy coherence from the start and if implementation of existing policies on the ground is pursued in partnership with all stakeholders and on all levels*".

The planning system can play a major role in the achievement of the SDGs and improving the health and wellbeing of individuals. Indeed, the draft NPF acknowledges that decisions made regarding land use and the built environment including transportation affects health risks including heart disease, mental health and obesity through a variety of ways including air and water quality, traffic safety and opportunities for physical activity. There is a major opportunity for the NPF to positively impact upon health and wellbeing through sustainable development pattern, where housing and employment locations would be located within walkable access to public transport and safe cycling and walking routes.

Sustainability will become increasingly harder to achieve the longer our current development pattern continues. In setting out policies and objectives for development in Ireland over the coming 2 decades, it is imperative that the NPF recognises Ireland's shortcomings in rectifying our unsustainable development pattern.

The current trend of development in Ireland contradicts the goals of sustainable development and cannot continue. Several strategies and guidelines have come before the NPF which outline visions, objectives and actions to reduce sprawl, decrease car dependency, integrate development with public transport, make areas more 'cycle and pedestrian friendly' and improve the quality of life for all. These previous strategies have failed in achieving their aspirational visions – this is evident from the most recent CSO Sustainable Development Indicator 2017 report and a number of other data sources discussed throughout this submission. The draft NPF lacks any clear targets and timelines to reduce Ireland's ongoing unsustainable development pattern and our resultant unhealthy commuter behaviours which have a direct impact on our health and wellbeing in a number of ways. There is a complete lack of reference to the UN SDG and the associated EU SDG Indicators.

It is imperative that the NPF embraces the UN SDGs and implements achievable and targeted measures for controlling our unsustainable sprawling development pattern where planning of settlement development and transport infrastructure is integrated.

2.3 Key Principles

The challenges of climate change cannot be addressed through technology alone, but require thoroughgoing societal change and the implementation of robust, proactive planning measures for the creation of alternative kinds of places. As a strategy which aims to shape Ireland well into the 21st Century, it is essential, therefore, that the entire worldview sustaining the Draft NPF vision be critically re-thought, along the lines of the following key principles:

1. **Equity**:

   Rather than the promotion of economic growth as the primary aim and aspiration of Ireland 2040, An Taisce argues for the creation of a better society through a planning and land system that spreads public goods to meet societal needs and works in the long-term public interest to secure wider social well-being over the next generations. People have a right to live in places that provide them with opportunities to live a good life, individually and collectively, provided this is done within the limits of justice, intergenerational equity and environmental sustainability (e.g. that our pursuit of the good life does not prevent others, or future generations, from living well).

2. **Localisation**:

   In order to achieve a national commitment to equivalent living conditions, a core NPF objective should be that no new housing development shall be permissible which is greater than 15-minute walking distance from basic services and infrastructure e.g. public transport, supermarket, childcare facilities, school, post offices, etc. Regional and local plans should be charged with determining such services and locations, and where there is a deficit, they must be upgraded in tandem with housing development. This simple principle, rigorously enforced, is possible and would go furthest in achieving the objectives of smart, compact growth espoused in the Draft NPF and in regenerating our rural towns and villages.

3. **Pragmatism**:

   Imagining the future is one thing, but to achieve it we need to be honest and correctly diagnose where we are now. Successive national spatial strategies have sought to achieve balanced regional development and compact settlement patterns. These have all failed and there is simply no evidence that the current political culture and structure with its pre-eminent focus on the parochial and local has the capacity to achieve regional parity in population growth. We must be pragmatic and realise that our current settlement patterns are ‘locked in’ and represent ‘facts on the ground’. Instead of redirecting scarce resources towards achieving implausible regional population targets, the focus of the Draft NPF should therefore be the adaptation task and retrofitting our inherited and widely dispersed settlement structures to make them more resilient and adaptive for the stresses and challenges that lie ahead with climate change and resource depletion.

4. **Land Reform**:

   In the absence of a firm political commitment to national planning, the market produces the places in which we live, in ways which meet a concern for individualism and profit rather than the needs of society. Land reform is therefore essential to give the public and communities a stake in development and future value. To acquire land to meet public need, Land Value Tax, CPOs and other powers must be used as levers to transfer ownership from private landowners and developers who will not build, to communities, local authorities and other accountable bodies who will. Extending democratic and community ownership of land whether by leasehold, trust ownership, or outright purchase is crucial to economic revival, to the effective delivery of house building and community regeneration. Taking a public stake in land is not a cost but an essential long term infrastructure investment.

5. **Decarbonising Infrastructure**:

   The Draft NPF is replete with contradictory objectives which, on the one hand, advocate the decarbonisation of society but, on the other hand, promote the development of airports, motorways, data centres etc., which are carbon and energy intensive infrastructures. As current national policy has effectively precluded any contribution from agriculture in future emission reduction efforts, it is absolutely essential that all future investment in transport infrastructure is redirected exclusively to public transport.

6. **A New Rurality**:

   The current policy approach to Ireland's rural areas is productivism, either in large-scale agri-business or suburbanised housing. Ireland's low population density and rural areas can be our most precious resource for a post-carbon world in terms of sustainable local food production, native forestry, and decentralised energy generation through, for example, small-scale wind, hydro, biomass, geothermal, combined heat and power, and solar. If planned correctly, this opportunity could be a significant boon for rural communities, help increase their resilience and buffer them from the vulnerabilities of global uncertainty and energy price inflation. However, in order to achieve this, the Draft NPF must advocate a decisive shift away from current polluting and carbon-intensive agriculture and settlement patterns towards a new relocalised vision for rural Ireland focused on our historic network of rural towns and villages.

3.0 KEY ACTIONS

3.1 Climate

The Citizens Assembly have spent two weekends of discussion in October/November 2017 on "**How the State Can Make Ireland a Leader in Tackling Climate Change".** At the conclusion, The Chair of the Assembly, the Honourable Ms Mary Laffoy, said:

> "*This weekend the Citizens' Assembly was charged with the task of offering citizen insight to government on feasible ways of addressing the issue of climate change that would be likely to have the support of the public and in turn allow us to meet our existing international and European obligations.*
>
> *Today the members of the Assembly have made a series of ambitious recommendations which make it clear that they believe there is a path for the State to make Ireland a leader in climate change however it would require significant changes in current policy and activities*."[iv]

The assembly voted on 13 questions and the following recommendations were made by the Assembly:

- 98% of members recommended that, to ensure climate change is at the centre of policy-making in Ireland, as a matter of urgency a **new or existing independent body should be resourced appropriately**, operate in an open and transparent manner, and be given a broad range of new functions and powers in legislation to urgently address climate change.
- 100% of members recommended that the State should take **a leadership role in addressing climate** change through mitigation measures, including, for example, retrofitting public buildings, having low carbon public vehicles, renewable generation on public buildings and through adaptation measures including, for example, increasing the resilience of public land and infrastructure.
- 80% of members said they would be willing to pay **higher taxes on carbon intensive activities**.
- 96% of members recommended that the State should undertake a **comprehensive assessment of the vulnerability of all critical infrastructure** (including energy, transport, built environment, water and communications) with a view to building resilience to ongoing climate change and extreme weather events. The outcome of this assessment should be implemented. Recognising the significant costs that the State would bear in the event of failure of critical infrastructure, spending on infrastructure should be prioritised to take account of this.
- 99% of members recommended that the State should enable, through legislation, **the selling back into the grid of electricity** from micro-generation by private citizens (for example energy from solar panels or wind turbines on people's homes or land) at a price which is at least equivalent to the wholesale price.
- 100% of members recommended that the State should act to ensure the greatest possible levels of community ownership in all future renewable energy projects by **encouraging communities to develop their own projects** and by requiring that developer-led projects make share offers to communities to encourage greater local involvement and ownership.
- 97% of members recommended that the State should **end all subsidies for peat extraction** and instead spend that money on peat bog restoration and making proper provision for the protection of the rights of the workers impacted with the majority 61% recommending that the State should end all subsidies on a phased basis over five years.
- 93% of members recommended that the number of **bus lanes, cycling lanes and park and ride facilities** should be greatly increased in the next five years, and much greater priority should be given to these modes over private car use.
- 96% of members recommended that the State should immediately take many steps to **support the transition to electric vehicles**.

- 92% of members recommended that the State should prioritise the **expansion of public transport** spending over new road infrastructure spending at a ratio of no less than two-to-one to facilitate the broader availability and uptake of public transport options with attention to rural areas.
- 89% of members recommended that there should be a **tax on greenhouse gas emissions from agriculture**. There should be rewards for the farmer for land management that sequesters carbon. Any resulting revenue should be reinvested to support climate friendly agricultural practices.
- 93% of members recommended the State should introduce a standard form of mandatory measurement and **reporting of food waste** at every level of the food distribution and supply chain, with the objective of reducing food waste in the future.
- 99% of members recommended that the State should review and revise supports for land use diversification with attention to supports for **planting forests and encouraging organic farming**.[v]

The NPF recognises the importance of planning in climate action and many of these recommendations are reflected in the document - however some are not handled in a robust enough fashion.

Current Status

Ireland contributes disproportionately to climate change, having the third highest emissions per capita in the EU. Ireland's higher than average (45%) carbon-intensity per capita is recognised in the Draft NPF.

Under the UN Framework Convention on Climate Change (UNFCCC), Ireland has repeatedly agreed that developed countries need to cut emissions by 25-40% by 2020 (compared to 1990 levels) to help avert dangerous climate change (i.e. staying below a 2°C global temperature increase above pre-industrial).

However, the Environmental Protection Agency's (EPA) data has repeatedly shown that Ireland's actual emissions between 1990 and 2020 are projected to *increase* by between 7% and 10% (and to increase again by 2030). What matters is total emissions of greenhouse gases. It has been recognised in the Paris Agreement which Ireland has ratified that 2°C is not in fact a "safe" limit, leading to a more ambitious target:

> *"Holding the increase in the global average temperature to **well below** 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change."*

Despite the fact that global ambition has increased and the Government accepts the science of climate change, effective action has consistently not followed. Instead, earlier this year the Government approved the first National Mitigation Plan (NMP), which is systemically deficient and is now subject to a judicial review in the courts.

There is a detailed critique of the serious limitations of the NMP in the Joint Stop Climate Chaos/Environmental Pillar submission to which An Taisce made a substantial contribution.

The Climate Change Advisory Council (CCAC) in commenting on the Draft NMP in their First Periodic Review Report published shortly after the NMP was approved in July 2017 stated that:

> *"It is urgent that effective additional policies are implemented to place the economy on an environmentally sustainable pathway to a low-carbon Ireland in 2050...While the draft National Mitigation Plan identified a range of policy options, the introduction of, and commitment to new, cost-effective emission reduction policies and measures is essential."*[vi]

The Chair of the Council said later in the press:

> *"The plan has many ideas for action but it contains very few decisions… Without major new policy initiatives, not only will we miss the 2020 targets, but Ireland will continue on a path of rising emissions. We need decisions and actions that will move Ireland back on track and on to a sustainable path, so that by 2050 Ireland is no longer adding to climate change."*[vii]

As well as contributing to dangerous climate change impacts, the predicted costs to Irish taxpayers of failing to meet Ireland's targets are vast. 2016 estimate of exchequer costs of between €230 million and €610 million by 2020 and costs of between €3 billion and €6 billion by 2030[viii].

The recent history of Irish climate change policy is typified by a yawning implementation gap between rhetoric and reality. Mitigating and adapting to climate change poses a fundamental socio-spatial challenge which requires a radical reorientation of perspectives and rigorous, committed and consistent policy implementation. The draft NPF continues the trend in recent policy documents in putting forward a vague, simulative policy agenda which professes to addresses Ireland's greenhouse gas emissions but, in reality, does little or nothing.

What is required are purposive, concrete policy provisions based on tangible targets. Instead, the draft NPF is replete with contradictory policy measures. For example, there is a fundamental dissonance between promoting carbon intensive infrastructure, such as airports and motorways, and exempting agriculture from greenhouse gas abatement measures. It is simply inconceivable that Ireland's climate targets can be achieved through the transport and energy sectors without a significant downshift in absolute (not merely per capita) energy demand.

For example, there are currently 2 million cars in Ireland of which just 2,000 (0.1%) are currently electric vehicles. The idea that we could ramp up electric vehicle penetration, as proposed in the Draft NPF, to significantly reduce emissions over the next two decades is tenuous given the lack of effective policy to promote this (e.g. a roadmap that would effectively exclude sales of new combustion engine vehicles within five years at most, to allow for the subsequent 15-20 year fleet turnover time). In any event, even if such a shift were possible, Ireland would have to find space for a concomitant ramp up in renewable electricity to displace fossil fuel use in private cars in addition to that proposed to serve data centres, which are already voracious electricity consumers. The most realistic and cost effective pathway to radically reducing emissions from the transport sector is via investment in public transport and the creation of attendant public transport friendly, compact places.

Recommendations:

- **There is no time for contradictory policies in respect of climate change. All policies favouring carbon and energy intensive infrastructure should be purposively discontinued, such as motorways, airport expansion and data centres. In the context of climate change and resource depletion, such investments carry a substantial risk of becoming stranded assets.**
- **Distributed electricity generation should be favoured as far as possible, including small hydro, solar power, geothermal and wind power, linked to community-based and cooperative ownership models.**
- **All new buildings must be either 'energy positive' or 'Zero Energy'; but even more importantly, a rapid programme of deep retrofit (to near zero energy) of the existing national building stock must be activated without delay.**
- **Land-use to mitigate and adapt to climate change and global resource depletion must be fundamentally rethought. Instead of the current profit-driven productivist model, natural land management offers greater potential for flood attenuation, coastal zone management, woodland creation, peatland restoration and local bio-energy resources to fuel, relocalised energy networks and sustain relocalised rural economies.**

3.2 Irish Biodiversity

Biodiversity and Natural Heritage are not given the status of any specific National Policy Objective or National Strategic Outcome measure in the Draft NPF. This is a major omission and An Taisce calls for it to be redressed.

Section 8.3 of the draft makes reference to biodiversity in *"recognising the important role of planning to enhance biodiversity and ensure greater environmental coherence to the planning system"* and under Natural Heritage to *"Conserve and enhance the rich qualities of natural and cultural heritage of Ireland in a manner appropriate to their significance*".

The NPF has a clear role in protecting and enhancing biodiversity since applications for animal housing, land drainage, peat extraction and other categories of development are land use impacts which are determined through the planning system.

The "Status of EU Protected Habitats and Species in Ireland" has been set out as part of the six-yearly Habitats Directive Article 17 Reporting to the EU. The last report, made in 2013, shows the scale of the challenge facing Ireland.

Of the 59 "Habitat Overall Assessments" only 5 stood at "Favourable" status, 30 "Inadequate" and 24 as "Bad". Of the habitats identified as having bad status there are clear groupings that stand out: Firstly in relation to peatlands including raised and blanket bogs, wet and dry heaths, and secondly for biodiversity-rich grassland areas including orchid rich and species rich grasslands, Molinia and Lowland hay meadows and tall herb grasslands.

Of the 61 "Species Overall Assessments" only half were "Favourable". 11 were "Inadequate" including Atlantic Salmon and Marsh Fritillary Butterfly with a continued decline of a number of snail species. Six were "Bad" namely the Freshwater Pearl Mussel, and its Nore variant, Sea Lamprey, Twaite, Shad and Pollan. The Natterjack toad, while listed as bad, was stated to have "genuine improvement" in comparison to previous reporting period. Updated data is awaited to determine if the major conservation work currently in progress has achieved reversal of the on-going decline of the Freshwater Pearl Mussel. The lack of data on a range of whale species left their status "Unknown". Agricultural intensification and forestry were identified as the main pressures on terrestrial and freshwater habitats.

For marine fish species, which are not reported under the Habitats Directive, the latest figures from the European Commission's Scientific, Technical, and Economic Committee for Fisheries confirm that overfishing continues. According to the most recent updated data, 41% of fish stocks were still being overfished in 2015. Assessment and conservation status data on marine mammals and habitats generally in Irish waters is inadequate. As a country with 90% of its territorial jurisdiction being in the marine area, there is a particular onus on Ireland to take leadership in marine life protection and the implementation of the EU Marine Strategy Framework Directive (MSFD).

Link to An Taisce submission to Joint Oireachtas Committee on Arts, Heritage, Regional Rural and Gaeltacht Affairs, July 2017.

3.3 River Basin Management

In August 2017, the EPA revealed that no effective progress has been made in meeting EU Water Framework Directive (WFD) targets to improve the quality of Irish rivers, lakes and estuaries.

Ireland failed to meet the overall 13% improvement proposed for the 2010 -2015 period and there is little change in water bodies in an unhealthy state: at 43% from 45% for Irish rivers, the 54% figure for lakes unchanged, and estuaries marginally unchanged to 69% from 70%. The report also reveals increases in fish kills in 2013-15 in comparison to previous periods.

Of particular relevance to the NPF is the impact of increased cattle housing to accommodate a 6% annual increase in the dairy herd since the lifting of milk quotas and the extent of deficient sewerage infrastructure with 44 urban wastewater discharges linked with a high degree of probability to river pollution and raw sewage still being discharged into the water environment of 44 municipal areas.

The An Taisce submission on the Draft River Basin Management Plan in August 2017 concludes that it evades effective action in all areas affecting water management in meeting of WFD "Good Water Status" targets, in favour of continuing avoidance of effective regulation of forestry, peat extraction, water abstraction, aquaculture and other activity.

Link to An Taisce submission and recommendations to Dept. Housing, Planning, Community and Local Government on the River Basin Management Plan 2018-2021.

3.4. Health and Well Being

Ireland's current settlement pattern is not supporting a healthy lifestyle. In 2011, nearly one in ten workers spent one hour or more commuting to work. Ireland's Sustainable Development Indicators for 2016 show 65% of commuters still travel to work by car, despite a 2009 target set out in Government policy to reduce work related travel by car to 45%. These development patterns and commuter behaviours are directly impacting our health and wellbeing through:

- Firstly development sprawl is associated with high levels of driving, driving contributes to air pollution and air pollution causes morbidity and mortality.[ix]
- Secondly, high car dependency and long commutes is decreasing leisure time available to us and contributes to sedentary lifestyles, this lifestyle has long been associated with physical health consequences such as obesity, cardiovascular disease and mental health impacts including anxiety or depression.
- Thirdly, increased vehicle miles travelled and increased car dependency heightens the chances of road traffic accidents, fatalities and injuries.

Death rate due to chronic diseases

Goal 3 of the UN SDG is to '*Ensure healthy lives and promote well-being for all at all ages'*. An EU SDG indicator under this goal provides for the death rate due to chronic diseases.

A 2014 HSE Report 'Preventing chronic disease: defining the problem' outlined that the chronic diseases; cancer, coronary heart disease, chronic obstructive pulmonary disease, and diabetes account for 60% of all deaths worldwide and 76% of deaths in Ireland[x].

Key Statistics: (HSE 2017. Planning for Health. Trends and Priorities to Inform Health Service Planning 2017)

- In 2014, three quarters of the 29,095 deaths were due to four chronic diseases - cancer, cardiovascular, respiratory and diabetes.
- In 2015, 17% of all hospitalisations occurred due to cancer, cardiovascular, respiratory and diabetes.
- In 2017, 559,620 people will have at least one chronic disease.
- By 2020, it is estimated that most of the major chronic diseases will increase by approximately 20%
- The number of people with cancer, cardiovascular disease, diabetes, stroke, respiratory disease etc., will all increase by between 4% and 5% per annum.

The 2017 HSE 'Planning for Health' report has stated that '*the mounting burden of chronic disease is largely attributed to a well described set of modifiable risk factors*'. Preventable risk factors on development of chronic diseases include smoking, high blood pressure, overweight and obesity, high cholesterol, alcohol use, physical inactivity and poor diet.

The correlation between inactivity and chronic diseases are outlined in Ireland's National Activity Plan. Figures show physical inactivity in Ireland is thought to be responsible for: 8.8% of the disease burden from coronary heart disease (Europe 5.5%), 10.9% of type 2 diabetes (Europe 6.8%), 16.2% of breast cancers (Europe 9.3%) and 15.7% of colon cancer (Europe 9.8%).[xi]

The way we shape our built environment can influence our everyday lifestyle choices, which can have a direct impact on some of the known modifiable and preventable risk factors for chronic diseases. The level of activity we get is a cited risk factor. Inactivity can also result in the development of other known risk factors including overweight and obesity, which is also listed as an EU SDG Indicator.

A high proportion of the Irish population are not meeting recommended physical activity levels. Only 32% of adults are meeting the national physical activity recommendations. The number of children reaching the recommended target for physical activity is worryingly less with only 19% of primary and 12% of post primary school children meeting the recommended physical activity target. (Dept. of Health, 2016).

The National Physical Activity Plan for Ireland, highlights that the way the built environment is designed, planned and built can act as a barrier to being active and can reinforce sedentary behaviour and car dependency. The plan outlines 8 thematic Action Areas for encouraging greater participation in physical activity. Action Area 4 (Environment) recognises that "*promoting the use of the natural and built environment and promoting active transport are the most practical and sustainable ways to increase physical activity as part of everyday routine".* The plan outlines 7 Actions under Area no. 4 including an action which provides for *the prioritisation of the planning and development of walking and cycling and general recreational/physical activity infrastructure.*

Obesity rate

EU SDG Indicator 'Obesity rate' falls under UN SDG 3. A correlation can be made between the physical inactivity levels in Ireland and the level of our population that are over overweight or obese.

Only 40% of the Irish population have a healthy weight (Dept. of Health, 2016), with 37% being overweight and 23% obese (Healthy Ireland Survey 2015, Summary of findings). Data indicates that 1 in 4 children, 6 in 10 adults and 3 in 4 adults over 50 are overweight or obese. (A Healthy Weight for Ireland, Obesity Policy and Action Plan 2016, The Department of Health). It has been estimated that the full cost in Ireland associated with obesity is €1.13 billion.

Speaking about obesity levels in Ireland, Leo Varadkar described obesity *as a major personal and public health problem which needs to be treated as seriously as tobacco was treated in the past.* Prof O'Shea commented that he believed Ireland was leading the trend because we have a particular problem with physical activity levels, especially among young women.[xii]

Key Statistics:

- 25% of children aged 3, 5 and 9 are overweight or obese. Even if these rates of overweight and obesity remain constant among children, given the increasing numbers of children, tackling these risk factors will remain a key priority for the future of the population's health. (HSE, 2017)
- There was a 56% increase in obesity among males and 70% increase in obesity among females between 2007 and 2015. Adult (18-64 yrs.) (HSE, 2017)
- Obesity levels have doubled in males and females aged 65 years and over since 2007. Adults (65+ yrs.) (HSE, 2017)
- Levels of obesity among males and females aged 65+ years have doubled since 2007 and, if current rates persist, there will be approximately 260,000 people aged 65 and over obese by 2022. (National Activity Plan)

The Obesity Policy and Action Plan[xiii] sets targets to be achieved and actions that will produce measurable outcomes. The short-term (five-year) targets for overweight and obesity are:

- A sustained downward trend (averaging 0.5% per annum as measured by the HI Survey) in the level of excess weight averaged across all adults;
- A sustained downward trend (averaging 0.5% per annum as measured by COSI) in the level of excess weight in children; and
- A reduction in the gap in obesity levels between the highest and lowest socioeconomic groups by 10%, as measured by the Healthy Ireland and COSI surveys.

In relation to the built environment and encouraging more active lifestyle, Action 2.1 of the Obesity Policy and Action Plan provides for the *development of guidelines and support materials for those working in developing the built environment for urban development and planning in relation to reducing the obesogenic environment.*

The draft NPF does not go far enough in ensuring a transformation of our built environment and unsustaianable development patterns. The NPF needs to represent joined-up government thinking to ensure that regular physical activity is achieved through targeted and measured objectives.

With regard to health and wellbeing, the draft NPF have included objectives no. 26 and 28:

> *Support the objectives of public health policy including Healthy Ireland and the National Physical Activity Plan, though integrating such policies, where appropriate and at the applicable scale, with planning policy.* (Objective 26)
>
> *Ensure the integration of safe and convenient alternatives to the car into the design of our communities, by integrating physical activity facilities for all ages, particularly prioritising walking and cycling accessibility to both existing and proposed future development, in all settlements.* (Objective 28)

It is our considered opinion that the objectives set out have relied too heavily on previous government plans which have been overly suggestive rather than mandatory and targeted. In order for objective 28 to be achieved, investment needs to be redirected to public transport and walking and cycling infrastructure. The provisions for investment in public transport and cycling and walking route enhancement are not linked to any key targets or specific targets for the 5 metropolitan areas.

3.5 Air Quality

An EU SDG Indicator for both Goal 3 and 11 is: '*Urban population exposure to air pollution by particulate matter*'.

Air pollution is a clear marker for sustainable development, as sources of air pollution also produce climate pollutants. The World Health Organisation (WHO) (2016) have highlighted the impacts of poor air quality, stating that to date air pollution – both ambient (outdoor) and household (indoor) – is the biggest environmental risk to health, carrying responsibility for about one in every nine deaths annually.

It is estimated that more than 400,000 premature deaths are related to air quality in Europe per-year. In relation to Ireland, the number of premature deaths attributed to our air quality is estimated to be 1,200 people annually

WHO have identified ischemic heart disease to be the leading cause of pre-mature deaths a result of poor air quality. Research carried out by the US EPA (2015) show that air pollution can trigger heart attacks, stroke, and irregular heart rhythms –especially in people who are already at risk for these conditions. The US EPA have categorised 'at risk' people to be those who have existing heart related disease, chronic lung disease, males over 45, females over 55, family history of heart disease, blood pressure or high cholesterol, overweight of smoke cigarettes[xiv].

Having regard to Ireland's current level of obesity, heart disease and aging population, and given that air pollution can trigger associated risks, it is vital that Ireland limits the level of air pollution.

In relation to respiratory diseases such as asthma, Ireland as the forth highest prevalence of asthma in Ireland. Data from the Asthma Society of Ireland show that 7.1% of 18+ population have asthma, 18.9% of 13-15 year olds have asthma and 38.5% of 13-15 year olds reported wheezing.

While Ireland, on the basis of current data, does not currently exceed EU target values, we have exceeded the WHO guidelines which are more stringent. Irish policy and legislation for clean air should aim to meet WHO guideline values in relation to all aspects of air pollution

EPAs 'Ireland's Environment, An Assessment' 2016 report commented that "*...Ireland should adopt these stricter WHO values, particularly for particulate matter and ozone, as with the increased understanding of the*

science of air quality and its impact on health has come the realisation that ***compliance with EU air quality limit values is not enough to protect the health of Irish from the negative effects of air quality.***"[xv]

For larger urban areas and Motorways the primary impact of concern is vehicle pollution exacerbated by diesel fuelled vehicular traffic. Actions to reduce air pollution from transport can have multiple benefits if correctly targeted. These benefits include reducing chronic diseases, obesity, meeting climate targets, reducing noise and combating of congestion.

All of these actions are most effectively achieved by reduction in road vehicle use, combined with fuel efficiency and land use policies to reduce transport demand and achieve significant modal shift from private passenger vehicle to public transport, with walking and cycling for short journeys and road freight to rail. This approach would reduce our expose pollutant air particle emissions with ancillary benefit of reducing greenhouse gases and curtailing, noise, urban sprawl and congestion.

Increase in transport demand, especially demand for specific modes of transport, is not inevitable. The first objective of an air quality strategy for transport pollution should be to limit transport demand through more effective land use and spatial strategy. We need to limit private car ownership and use. Projections for increase of the national car fleet from 2m in 2015 to 2.6m in 2035 is a scenario we ought to avoid, not passively accept. And with effective policies, is one we should have no trouble avoiding.

Link to An Taisce submission and recommendations to Dept. of Communications Climate Action, and Environment on the National Clean Air Strategy.

4.0 DEFINING OBJECTIVES

4.1 Defining targets and timetables for the 70 National Policy Objectives

70 National Policy Objectives are set out in the Draft NPF. Apart from the population, regional distribution and urban location targets, only a small number of the remaining objectives contain specific targets. The most serious omissions are in relation to transport mobility and climate mitigation. Most of the non-target based objectives are worthy in principle, but undermined by their aspirational status.

Ireland adopted a comprehensive Transport Strategy " Smarter Travel " in 2009 with modal shift targets to reduce workplace travel car use to 45% by 2020 and a commitment that the total kilometres travelled by the national car fleet would not exceed then current levels. The parallel National Cycling Framework provided a 10% target for commuting travel by 2020. A series of policy implementation and investment failures has meant that these targets are not being met, which now requires major intervention. Further detail on our modal share and accessibility to public transport (both EU SDG Indicators) is outlined in Section 5.3 of this submission with recommendations for sustainable mobility outlined in Section 7.0.

4.2 Regional Population and Housing Location Targets for Urban Development

The main overriding target in the draft NPF is contained in Objectives 1(a),1(b) and 1(c) which set out clear population and job increase targets for balancing a million population growth increase between the 3 regions.

Objective 2(b) provides that *"At least half (50%) of the future population and jobs growth will be focused in the five cities and their immediately adjoining suburbs with a target of around two thirds (66%) to be focused in the cities and their suburbs together with a number of large regionally distributed towns and their environs to be identified through the Regional Spatial and Economic Strategy (RSES) process."*

There is a lack of clarity as to where or what location criteria will apply to the remaining 34% of population and jobs growth. It is not stated how much will be located within smaller towns and villages, and the extent to which the overriding "*smart growth"* objectives set out in the draft NPF could be undermined by continuing levels of dispersed one off and ribbon development housing in the countryside, or non-public transport accessible housing or workplaces. There is a lack of quantification of the projected capacity for and level of further one-off and ribbon development housing which can be accommodated in Objective 18.

Objectives 3(a), 3(b) and 3(c) set out location based targets.

3(a) provides for the delivery of at least "*40% of all new homes nationally within the built-up envelope of existing urban settlements."*
3(b) provides that "*at least half (50%) of the new homes in the five Cities and immediately adjoining suburban areas … would be delivered within the built-up envelope of existing urban settlements."*
3(c) provides that *"in areas other than the five City and suburban areas of Dublin, Cork, Limerick, Galway and Waterford, at least 30% of new homes would be delivered within the built-up envelope of existing urban settlements*."

Specific measures are provided for the 5 cities, including rail and public transport investment in Dublin. Specifically sustainability or quality of life targets such as access to safe cycling routes or walkable proximity to public transport are needed.

4.3 Rural Housing Provision

Chapter 4 sets out considerations for "*Planning for Diverse Rural Places*". Objective 14 provides that the targeted population growth of Ireland's small towns and rural areas to 2040 is proportionate, at an average rate of 15% in each Regional Assembly area. No target or cap is placed on the number or proportion of houses to be accommodated in the open countryside or exacerbating existing unsustainable ribbon development patterns.

The draft NPF endorses the measures set out in the Action Plan for Rural Development. This provides a well-considered and appropriate focus on strengthening rural towns and villages which An Taisce fully endorses. Indeed, An Taisce has been a long-standing, but ignored, advocate for our rural towns and villages as linchpins for the rural economy and society.

However the provisions of section 4.5 of the NPF in relation to the "*Open Countryside*" conflict with this objective, since it does not identify the sustainable capacity of any further one-off rural housing development.

It adopts a demand-based and not location need-based consideration of one-off housing in stating *"at local level, it will be necessary for the core strategy of county development plans to account for the demand for single housing in the countryside"*

Objective 18(a) uses an EU/OECD definition distinguishing areas under urban influence of cities and large towns of over 10,000 population and under that level. However this does not address the extent and distribution of Irish towns at or under a 10,000 population level, and the urban generated housing sprawl of towns like Westport which has a population of 6,000. According to Census 2016, 70% of all one-off dwellings are located between 1-5km of towns in excess of 1,500 population. The demise of our rural towns and villages and the increasing suburbanisation of the countryside are directly correlated. It is not possible to address one without addressing the other.

Distance from town	Built before 2011	Built 2011-2016	Not stated	Total
Less than 500 metres	28,252	775	429	29,456
500 metres - 1 Km	40,567	1,179	561	42,307
1-5 Km	275,706	8,745	4,043	288,494
5-10 Km	58,330	1,773	845	60,948
10 Km or more	4,447	114	74	4,635
Total	407,302	12,586	5,952	425,840

Table showing Rural Housing Dispersal

Objective 18(b) provides that *"in rural areas under urban influence, to facilitate the provision of single housing in the countryside based on the core consideration of demonstrable economic need to live in a rural area…*"

Objective 19 provides to *"Project need for single housing in the countryside through the local Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes"*

It is not clear why Objective 18b is limited to rural areas under urban influence, or why a stated "economic need" to live in rural area should be linked to accommodation of a house in the open countryside as opposed to a local village. No definition is provided as to what is 'economic need'. The decline that has occurred in many Irish towns has been caused in part by the building of one off houses in the open countryside, which has been seen as a cost effective option for people. However, dispersed housing externalises very significant hidden costs to society at large. If the true costs were accounted for, settlement in isolated locations would be generally unaffordable for households. Dispersal also considerably increases environmental pressures and heightens the vulnerability of rural

householder to cost inflation (e.g. transport fuel, carbon taxes and 'septic tank' charges), service withdrawals and infrastructure downgrades (e.g. hospital, ambulance services, roads, schools, post offices). The vagueness and lack of definition for 'economic' need may exacerbate the level of one-off housing and further deteriorate the fabric of Irish towns and villages.

Objective 19 fails to make a projection for the carrying capacity of additional dispersed one-off housing in the countryside in undermining sustainable settlement strategy, undermining of service basis of smaller towns and villages, traffic generation and exacerbation of car dependence, undermining of sustainable travel, service cost to society at large including implication of supporting an aging population, impact on biodiversity, water quality and on landscape.

The 2017 storms are the predicted outcome of increased climate impact on Ireland from a warming Atlantic. This escalating trend is going to result in increased storm exposure on dispersed rural housing particularly in western and southern coastal counties, with increased frequency of electricity supply outages, and other impacts with consequent societal cost of remedy. As noted by the ESB, the relatively scattered and widespread distribution of the rural population in Ireland is reflected in the extent and the characteristics of the distribution system. Ireland has four times the European average of length of network per capita. The ratio of overhead lines to underground cables is 6 : 1. With so much overhead line exposed to weather and other events, there is a significant challenge in maintaining an adequate and reliable supply in rural areas[xvi].

4.4 Sustainable Communities

Objective 33 in Chapter 5 on "*People, Homes and Communities*" provides for the targeting of the "*delivery of 550,000 additional households up to 2040 in accordance with the policy objectives of Ireland 2040".*

The only other specific target is Objective 35: *"to reduce vacancy and progressively target the reduction of national housing vacancy rate to 5% by 2040 (currently 9.15%)".* This measure is both lacking in ambition and a measurable timeframe.

Objective 37 provides for increase in residential density through a range of measures including increased building heights. However, an increase in building heights has not been reconciled with any policy or objective relating to architectural heritage and protection of the character of our historic urban centres in accordance with the 1985 Granada Convention on Architectural Heritage.

There is no reiteration of the well formulated though not implemented provision of the 2002 National Spatial Strategy for the six local service test requirements for new housing in Box 5.2

While a range of well stated principles are set out in Objectives 25 to 32, and in 34 prioritising "*the provision of new homes at sustainable locations*" these are not properly stated as mandatory requirements for new housing development. Implementation is left to Objective 38 on *"new statutory guidelines*" and the concern that ineffectively applied guidance will continue Ireland's planning failures.

Box 5.2

Housing Location in Urban Areas	Evaluation Considerations
The Asset Test	Are there existing community resources, such as schools etc, with spare capacity?
The Carrying Capacity Test	Is the environmental setting capable of absorbing development in terms of drainage etc?
The Transport Test	Is there potential for reinforcing usage of public transport, walking and cycling?
The Economic Development Test	Is there potential to ensure integration between the location of housing and employment?
The Character Test	Will the proposal reinforce a sense of place and character?
The Community Test	Will the proposal reinforce the integrity and vitality of the local community and services that can be provided?
The Integration Test	Will the proposal aid an integrated approach to catering for the housing needs of all sections of society?

5.0 INTEGRATING SUSTAINABILITY

5.1 Climate Action

Chapter 4 on considerations for "*Planning for Diverse Rural Places*" endorses current agricultural intensification and forestry policies. Chapter 6 on "*Realising our Island and Marine Potential"* refers to "*Harnessing our Ocean Wealth 2012"*. There are irreconcilable conflicts with these policies and climate action and biodiversity.

Chapter 8 "*Realising our Sustainable Future*" sets out nine National Policy objectives 54 to 62 embracing the circular and bio-economy, sprawl, carbon footprint, renewable energy and green infrastructure in the preparation of land use plans. None of these objectives contain any specific percentage-based or timetabled targets. All are phrased as vague general objectives to "*support*" "*promote*" or "*improve*", or in the case of climate to "*reduce our carbon footprint*".

The objectives contained in NPF Chapter eight are appropriate, admirable and aspirational. The missing ingredients are scale and urgency.

The phrase '*accelerate action on climate change*' captures the key essential requirement. Unfortunately there has been no evidence to date that the Government has any attention of acceleration except in a reverse direction.

Ireland has expended considerable diplomatic and other resources in the recent past in pressing for collective reductions in EU climate ambition and in particular minimising Ireland's emission reduction commitments for 2030.

Evidence for reverse acceleration includes:

- Increased spending on fossil fuel transport and infrastructure
- Expansion in the national dairy herd
- Continued harvesting and burning of peat - one of our most significant carbon sinks
- Granting of fossil fuel exploration licences
- Increased use of coal at Moneypoint,
- Grants for the installation of fossil fuel boilers, etc., etc.

In contrast, the Tipperary Energy Agency is a model of how advice and support for citizen engagement can deliver major results in energy efficiency. A genuine policy commitment to a TEA equivalent in every county would be an indication of the requisite ambition and a recognition of the scale of the challenge we face and the transition that must be effected within a dwindling timeframe.

Recommendations:

The following recommendations of the deliberations of the Citizens' Assembly should be integrated into section **8.2 Resource Efficiency and Transition to a Low Carbon Economy**

- 99% of members recommended that the State should enable, through legislation, **the selling back into the grid of electricity** from micro-generation by private citizens (for example energy from solar panels or wind turbines on people's homes or land) at a price which is at least equivalent to the wholesale price.
- 100% of members recommended that the State should act to ensure the greatest possible levels of community ownership in all future renewable energy projects by **encouraging communities to develop**

their own projects and by requiring that developer-led projects make share offers to communities to encourage greater local involvement and ownership.

- 97% of members recommended that the State should **end all subsidies for peat extraction** and instead spend that money on peat bog restoration and making proper provision for the protection of the rights of the workers impacted with the majority 61% recommending that the State should end all subsidies on a phased basis over five years.
- 93% of members recommended that the number of **bus lanes, cycling lanes and park and ride facilities** should be greatly increased in the next five years, and much greater priority should be given to these modes over private car use.
- 96% of members recommended that the State should immediately take many steps to **support the transition to electric vehicles**.
- 92% of members recommended that the State should prioritise the **expansion of public transport** spending over new road infrastructure spending at a ratio of no less than two-to-one to facilitate the broader availability and uptake of public transport options with attention to rural areas.

5.2 Food and Agriculture

Current quantity and export driven Irish agricultural targets as set out in Food Harvest 2020 and Food Wise 2025 are in direct conflict with maintaining and enhancing biodiversity, as well as climate mitigation. Food Harvest 2020 was approved without SEA. Food Wise 2025 was subject to SEA, so that if monitoring of agricultural intensification shows adverse impacts, which is now clearly occurring, corrective action is now required.

The current annual cattle herd increase of 6% per annum is being accommodated by the planning system in granting permission for additional animal housing and poor enforcement control of wetland drainage. This is creating renewed water quality pressures in meeting the Nitrates Directive, and the overlapping impact of slurry and fertilizer run off is affecting water quality. The most recent data presented by the Department of Agriculture, Food & the Marine at the EPA National Water Forum in June 2017 revealed that 12% of farms with a derogation are failing to comply and of the remaining 130,000 the failure rate is 30%.

This challenges Government and industry claims on the sustainability of Irish agriculture concluding that "*Overall, Irish agriculture in its current form is damaging to climate, water quality and biodiversity*" and is not contributing to global food security. It concludes that "*Agricultural intensification has caused significant negative impacts to Irish biodiversity*". It cites the impact of agricultural intensification or inappropriate afforestation causing the "bad" conservation status of a wide range of internationally important Irish habitats, the decline of ten key farmland birds and that "One third of Irish wild bees are under threat of extinction". It also highlights the need for the large expansion of area based high nature upland farming.

The coalition of Irish development NGOs forming "Stop Climate Chaos" and The Environmental Pillar both of which include An Taisce have published a report "*Not So Green:Debunking the Myths around Irish Agriculture*" in 2016.

The following recommendations of the deliberations of the Citizens' Assembly should be integrated into section 4.2 'Enhancing our Unique Rural Settings and the Communities who live there' of the National Planning Framework'

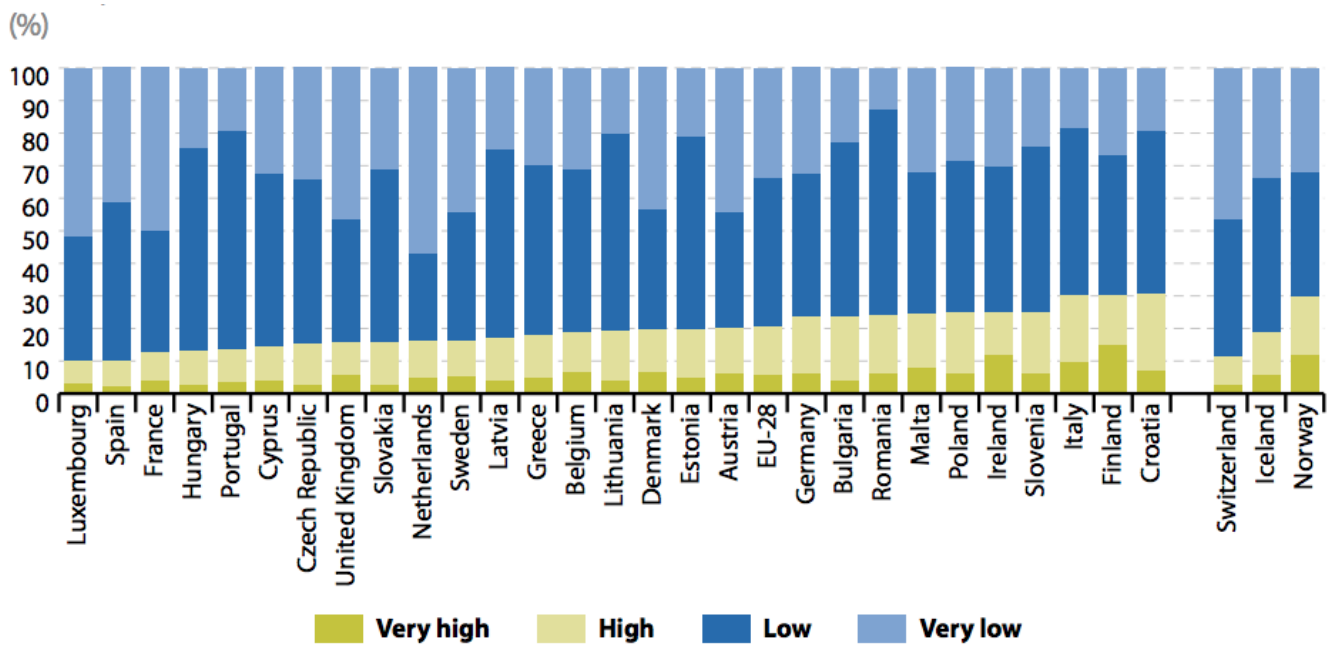
- 89% of members recommended that there should be a **tax on greenhouse gas emissions from agriculture**. There should be rewards for the farmer for land management that sequesters carbon. Any resulting revenue should be reinvested to support climate friendly agricultural practices.

- 99% of members recommended that the State should review and revise supports for land use diversification with attention to supports for **planting forests and encouraging organic farming**.

5.3 Transport

Our built environment has a major influence on our everyday lifestyle choices. As highlighted in Section 2.4 of this submission, a number of health impacts can be associated with Ireland's current development pattern and resultant commuter behaviours. Our current development pattern is not supporting a healthy lifestyle. In 2011, nearly one in ten workers spent one hour or more commuting to work. Ireland's Sustainable Development Indicators for 2016 show 65% of commuters still travel to work by car despite a 2009 Department of Transport '*Smarter Travel – A Sustainable Transport Future. A New Transport Policy for Ireland 2009-2020*' target set out in Government policy to reduce work related by car to 45% by 2020.

The Eurostat 2016 report '*Sustainable Development in the European Union: A Statistical Glance from the Viewpoint of the UN Sustainable Development Goals*', provides an overview of the current situation of the EU and its Member States on sustainable development in relation to the Sustainable Development Goals (SDGs). Under SDG 11 *Sustainable Cities and Communities* (Indicator: Accessibility to public transport), statistics for Ireland show that c.12% and c.13% reported 'very high' or 'high' difficulty in accessing public transport respectively. When compared to other Member States, Ireland has one of the highest reports of 'very high' difficulty accessing public transport. [xvii]

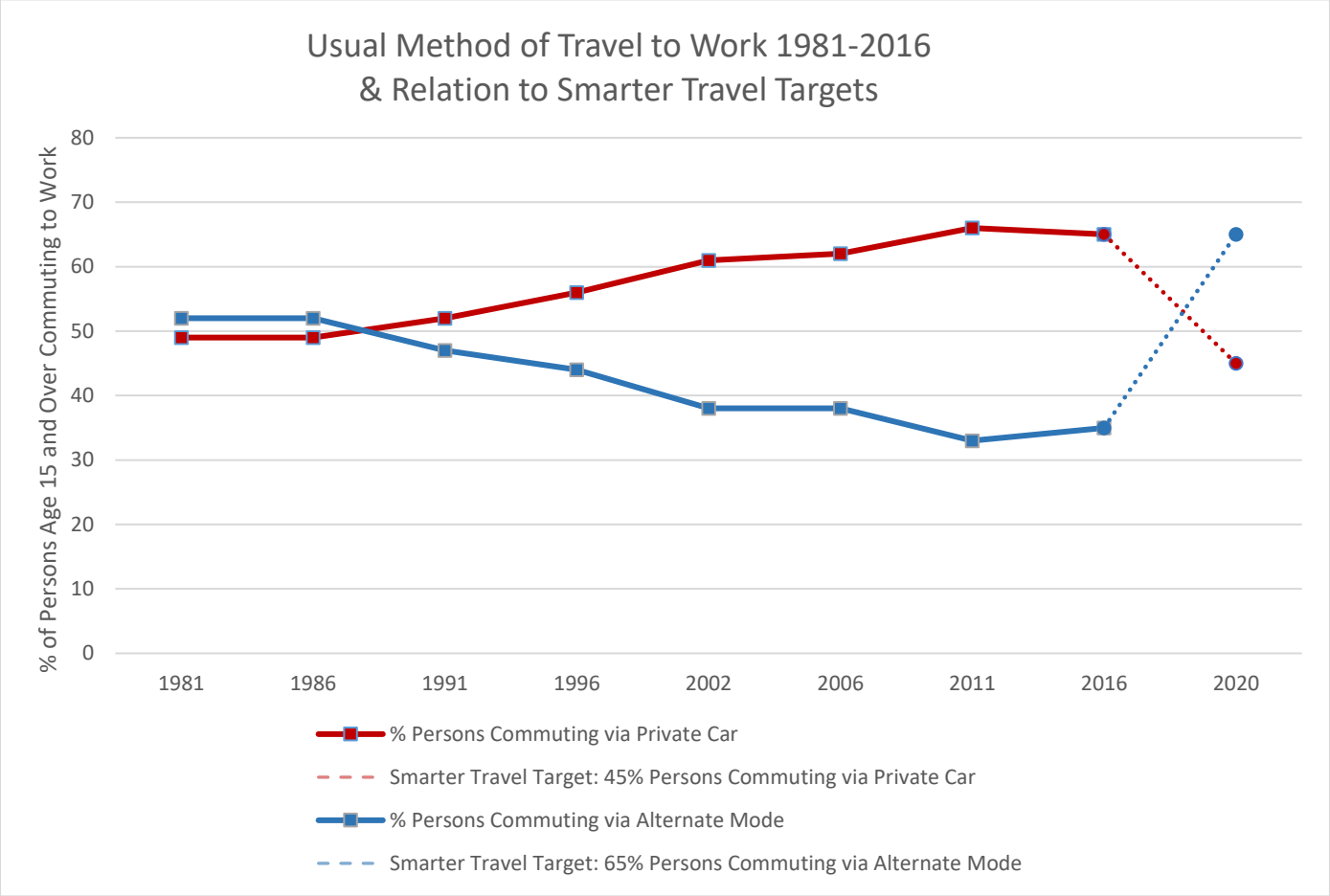


Our difficulty in accessing public transport is also reflected in our high car dependency. The third edition of Sustainable Development Indicators Ireland, published on a biennial basis, was released in 2017 by the CSO.

The data on commuter behavior trends for schools and work place travel clearly indicates Ireland's failure to meet the overriding policy objectives of Smarter Travel. Key Targets identified in Smarter Travel included '*work related commuting by car will be reduced from a current share of 65% to **45%***'; and '*car drivers will be accommodated on other modes such as walking, cycling, public transport and car sharing, to the extent that commuting by these modes will **rise to 55%** by 2020*'[xviii]. The data on travel behavior trends to both schools and work place clearly indicates Ireland's failure to meet the key targets of Smarter Travel.

Ireland's Sustainable Development Indicators 2017 shows the 'usual means of travel to work 1986-2016'. The data indicated that persons travelling to work (aged 15 years and over) on foot or by bus has fallen from 18% and 13% respectively in 1986 to 10% and 6% in 2016. In contrast, the proportion of persons who drive to work either by car or motorcycle has increased from 49% to 65% over the same period. [**2016 Modal Share Breakdown:** 10% foot; 6% bus; 4% car passenger; 3% bicycle; 4% train/dart/Luas; 8% other, 65% car][xix]

Figure 3.2 clarifies that Ireland has not progressed towards the achievements of the 2009 Smarter Travel targets.



Similar trends can be seen in the travel behavior of school children. The data showed that the proportion of 5 to 12 year olds (i.e. those of primary school-going age) who travelled to school on foot has fallen from 49% in 1986 to 25% in 2016. The proportion travelling as passengers in cars has, in contrast, risen from 26% in 1986 to 63% over the same period. [**2016 Modal Share Breakdown:** 25% foot; 1% bicycle; 11% bus/minibus/coach; 63% car passenger]

Similarly, the proportion of children in the 13-18 age bracket (i.e. those of secondary school-going age) who walked to school fell between 1986 and 2016 from 34% to 22%. The percentage cycling to school has dropped from 16% in 1986 to just 2% in 2016, while those travelling as passengers in cars has grown from 12% in 1986 to 43% in 2016. [**2016 Modal Breakdown:** 22% walk; 2% bicycle; 29% bus/minibus/coach; 43% car passenger; 3% other]

The NPF has a clear role in tackling Ireland's rising car dependency and improve the interface between the planning process and transport requirements. It is imperative that development and transport be planned in an integrated fashion and establish stronger integration between travel modes. Ireland's needs to strive for a high level of accessibility to public transport as this is an important pillar for addressing the environmental and health challenges that we face.

Recommendations for sustainable mobility are outlined in Section 7.0 of this submission.

5.4 Cultural Heritage - Landscape, Archaeology and Architectural Heritage

Annex 1 of the SEA Directive on the information to be assessed under Article 5 in the Environmental Report requires under (f) considerations of "*likely significant effects*" to include "*material assets, cultural heritage, including architectural and archaeological heritage, and landscape*".

The draft NPF contains no National Policy Objectives in relation to these considerations. It does not contain any recognition on consideration of cultural heritage.

Ireland has ratified a range of Conventions on Cultural heritage and landscape through the Council of Europe.

Cultural heritage and landscape is an integral part of international, national and local identity. The experience of heritage, local distinctiveness and sense of place is a key part of wellbeing. Cultural heritage and landscape should be treated an irreplaceable a legacy to pass to future generation, as well as being an economic and tourist asset.

Historic Urban Centres are an irreplaceable social, cultural and economic asset which should not be compromised by high rise or other inappropriate development. The policies in the NPF to curtail sprawl in favour of urban development needs to ensure the protection of historic centres from high rise or other inappropriate development.

Recommendations:

- **The NPF needs be informed by the National Landscape Character Assessment, the National Inventory of Architectural heritage, and associated inventory of Historic Gardens and Designed Landscapes in considering preferred location for infrastructure, urban expansion and other development.**
- **A commitment is required for clear resourcing of heritage and landscape evaluation and protection at all levels of the planning and decision making process, including new measures under**
- **The implementation of the European Convention on the Protection of the Archaeological Heritage (Valletta Convention) and other international conventions for the protection of archaeology and cultural landscape.**
- **Implementation of the ICOMOS Washington Charter for the Conservation of Historic Towns and Urban Areas to enhance the quality and status of historic Irish urban centres.**

6.0 NORTHERN IRELAND

Chapter 7 of the Draft "Working with our Neighbours" sets out 8 National Policy Objectives 46 to 53.

Objectives 52 is for "*ensuring effective management of shared landscapes, heritage, water catchments, habitats, species and transboundary issues in relation to environmental policy"*

This objective is vague and ineffectual. All of these areas come under EU legal protection through a range of continually improving Directives with targets and timetables. The Marine Strategy Framework Directive, SEA and EIA Directives have specific transboundary provisions. The Air Quality, Water Framework and Waste Framework, Birds and Habitats Directives provide the necessary protection to Ireland's environment on a transboundary basis

The potential impact of Brexit in allowing the UK to adopt a lower standard of environmental protection than under EU law poses a significant risk to Ireland. Vague aspirations for effective management and cooperation will not resolve this.

It is unclear whether Britain/NI will continue to implement the Marine Strategy Framework Directive, SEA and EIA, or Habitats Directive provisions for Appropriate Assessment (AA) and other Directives relevant to environmental protection.

Objective 53 is for*: "Co Operation with the United Kingdom Government and devolved Government of Northern Ireland Scotland and Wales, Ireland will support mutually beneficial development in the areas of spatial and infrastructural planning and other related areas.*"

This objective needs translation into specific timetabled agreement for joint action on decarbonisation of energy generation and transport and other measures. The future role the UK in relation to the EU Energy Union and EU Effort Sharing climate targets is not clear.

There are also major opportunities for positive co operation for recreation and eco tourism including greenways, cycling routes, and use of waterways.

Recommendations:

The Brexit negotiations explicitly require that the UK maintain (and where transposition update arises), the application of the EU Marine Strategy Framework, Strategic Environmental Assessment, Environmental Impact Assessment, Air Quality, Water Framework, Waste Framework, Birds and Habitats Directives to provide the necessary protection of Ireland's environment on a transboundary basis.

No reduction in the level of protection offered under EU Directives for Ireland's Environmental protection should be accepted given:

1. **The EU Water Framework requirement for integrated River Basin Management of the Erne and other catchments.**
2. **The Good Environmental Status targets for the Marine Strategy Framework Directive including on fish stocks.**
3. **The SEA and EIA implications of the level of existing and proposed large-scale infrastructure on both sides of the border, including north-south interconnector, and future Off-Shore Energy Renewable Development Plans (OREDP), and large-scale on/off-shore renewable.**

4. **The risk of inadequate transboundary action of air quality and climate causing smuggling in air and climate polluting solid fuel.**
5. **The risk of disparity in carbon taxation on vehicle fuel between the State and Northern Ireland causing fuel smuggling or "Fuel Tourism".**

The Brexit negotiation explicitly provide agreement for UK to maintain (but not reduce) EU climate Targets and undertake specific transboundary initiatives with Ireland including renewable electricity interconnection, Dublin Belfast rail electrification, and a low carbon sail rail passenger connection form Ireland to Wales with enhanced UK rail electrification.

7.0 THE STRATEGIC OUTCOMES

The Sustainability and Climate Proofing for the 10 National Strategic Outcomes for the National Investment Plan 2018-2027 funding.

Section 9.1 of the draft NPF sets out 10 National Strategic Outcomes (NSO).

Section 9.3 *"Ireland 2040 and the National Investment Plan"* sets out provision for integrating the National Investment Plan (NIP) 2018-2027 with 10 "National Strategic Outcomes" for the NPF.

This NIP and NPF integrated investment plan needs to be subject to SEA to ensure firstly that the NSOs are appropriate and secondly are based on clearly defined targets which are achieved.

An immediate issue is raised by the provision in Section 9.2 relating to the NIP which states that it will "*support the achievement of critical climate change goals including the recently published National Climate Mitigation Plan".* The National Climate Mitigation Plan is now the subject to a Judicial Review initiated in October 2017.

There is an unexplained lack of conformity between the NSOs as stated in Section 9.1 and the more detailed consideration and objectives in Section 9.3. In some cases the considerations set out in Section 9.1 such as *"Investment in connectivity first without urban consolidation measures will likely worsen trends towards sprawl*" and vehicle electrification a part of Sustainable Mobility are not addressed in the more detailed consideration in section 9.3.

The overall feature of the 10 National Strategic Outcomes designed to be supported by the NIP is the lack of identified targets and mitigation measures. The investment objective outcomes as currently stated do not meet SEA requirements as they are not based on adequate identification and mitigation of environmental impacts. If the NPF were to proceed on the basis proposed it would be exposed to legal action at national and EU level, arising from Article 10 of the SEA Directive.

In each category there should be clear numerical, percentage based or other time based or quantifiable targets, with a minimum three year periodic review provision to determine meeting of targets, taking of corrective action in the event of target failure, or requirement for target enhancement e.g. in relation to climate mitigation. This needs to be supported by effective implementation measures to ensure that the stated outcomes are met, with provision for individuals and organisations to seek remedy under the Aarhus Convention.

1. Compact Smart Growth

The level of investment into the proposed "*Smart Growth Urban Initiative*" and *"Smart Growth Rural Initiative*" is not defined. At the same time specific transport investment including road is identified in NSO objective 2.

No targets are provided on the percentage of new housing and employment locations which will meet smart growth criteria including:

1. For public transport accessibility within existing or expanding existing urban areas; and
2. For providing serviced sites in villages as an alternative to rural one off housing.

The unsustainable sprawl of recent decades, car based retail business parks, commuter housing in villages with poor services, long commuting to employment location, and ribbon rural housing has only been made possible by a laissez faire policy of allowing road access, sewage connection and other services to accommodate sprawl.

While urban small town and village enhancement is necessary and desirable, the principal means by which public investment can be re-directed to compact smart growth is through limiting the provision of access to public infrastructure and services for inappropriately located development.

Recommendations

1. **All new housing and employment development should be within 15mins walking distance of basic public services**
2. **Adopt national targets for the major percentage of new housing and employment locations to be located with walkable access to public transport and safe cycling and walking routes.**
3. **Update and expand Department of Transport 2009 "Smarter Travel" targets for predominant non individual car based mobility for employment, school and services access.**
4. **Provide direct provision of access to public infrastructure and services only to development meeting smart growth location standards.**
5. **Restrict road access to further ribbon development housing outside town and village speed limits.**
6. **Restrict public service connection generally to development not meeting "smart growth" location standards.**

2. Enhanced Regional Accessibility

If inter regional urban roads are allowed to become commuter corridors, as has occurred with the national motorway network over the last 20 years, the level of sprawl, rising climate emissions, air pollution, congestion, adverse quality of life and health impact in travel time and unhealthy mobility patterns would be exacerbated. Providing additional road capacity as with the current lane addition to the M7 Naas Newbridge stretch of motorway will worsen this. The recent opening of the M17 Gort By-pass will simply increase the level of car based traffic congestion in and around Galway.

This point is stated in the summary objective for '*Enhanced Regional Accessibility*' in section 9.1 which states that "*Investment in connectivity first without urban consolidation measures will likely worsen trends towards sprawl*". However no phasing or sequencing is provided to avoid such an occurrence, and indeed the publication of the draft NPF has coincided with the announcement of the reactivation of the M20 Cork Limerick Motorway plan.

The provisions for enhancing regional accessibility in the NPF draft fail entirely to make any reference to the railway network and are entirely road based, proposing a number of specific road schemes in Cork and Galway, to the N4, N14 and A5 "*Atlantic Economic Corridor* " to the North West, and to the M17/M18 and N15.

The only specific target relates to inter urban roads only in "*Improving average journey times targeting an inter urban speed of 90kph".* The draft NPF fails to address the achievability of this because of the congestion that will exacerbate if current levels of car use and ownership, and sprawl with free parking provision outside urban centres is allowed to continue. This undermines the entire basis of the investment objectives in the existing motorway network, and of any further road investment.

The Draft NPF fails entirely to address the 2009 Department of Transport "Smarter Travel" target that "*The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres"*.

There is no target of reducing per capita car ownership or use, or increase in modal share of interregional passenger /bus use, or rail freight.

Recommendations

1. **The interregional rail network be maximized in capacity for passenger and freight use, including travel speed enhancement.**
2. **That new Smarter Travel targets be adopted to require that the majority of inter urban and inter regional travel be through enhanced rail and bus modal share.**
3. **That further public subsidy of unsustainable car based development through infrastructure, including road access provision, will be curtailed.**
4. **Urban consolidation measures will first be put in place before new investment in regional interconnectivity, to curtail the current trend towards sprawl.**
5. **Further road investment be limited to locations where urban and village bypassing and enhanced safety provision is required.**

The following recommendations of the deliberations of the Citizens' Assembly should be integrated with the outcomes **Enhanced Regional Accessibility:**

- **92% of members recommended that the State should prioritise the expansion of public transport spending over new road infrastructure spending at a ratio of no less than two-to-one to facilitate the broader availability and uptake of public transport options with attention to rural areas.**

3. High Quality International Connectivity

Consideration of Airport capacity and expansion in the draft NPF does not address the climate impact of aviation and the extent to which aviation emission needs to be reduced to meet overall global climate action targets required by the Paris Agreement 2015.

No consideration is given to research development of a low carbon high speed passenger ferry between Ireland and Britain, liked to an enhanced electrified rail connection from Wales to England.

The consideration on Ports focus on the three Tier 1 ports of Dublin, Cork and Shannon Foynes and proposes enhanced road access only to Dublin and Shannon Foynes but not rail. The two Tier 2 ports of Waterford and Rosslare are not addressed despite having good rail access.

Recommendations.

1. **Revise airport capacity targets in accordance with climate emissions capacity limits.**
2. **Initiate Ireland-UK co-operation of development of low carbon sail/rail connectivity capacity.**
3. **Maximise potential of rail freight connectivity to ports, including reopening of Foynes Limerick freight rail line.**

4. Sustainable Mobility

The draft NPF objectives for achieving the National Strategic Outcome for Sustainable Mobility, represents a major policy failure.

No reference is given to the range of 2020 targets set out in 2009 Department of Transport Smarter Travel target that:

"*The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres"*

and;

"Work related commuting by car will be reduced for a current modal share of 65% to 45% "

The provisions for investment in public transport and cycling route enhancement are not linked to any targets, or specific targets for the 5 Metropolitan city areas.

Outside of Dublin the only reference to rail is *"potential to develop the existing good quality rail links between Dublin and Belfast and Cork into an all-Ireland rail spine through line speed and service enhancements".*

The summary consideration on Sustainable Mobility in Section 9.1 provides that *"in line with Ireland's Climate Change Mitigation plan, we need to progressively electrify out mobility systems*". However the detailed provision in Section 9.3 make no reference to this objective.

It should be recognised that while the rapid decarbonisation of the transport fleet is a climate action imperative, electric and other vehicles still have a major resource consumption impact and continue to emit particle pollutants through brake fluid and tyre wear. Meeting of sustainability targets requires reduction of current level of car uses and dependence, to curtail sprawl, congestion, inefficient resource use and unhealthy lifestyles.

Recommendations

1. **Effective targets for the decarbonisation of transport to prioritise increased shift to walking, cycling and clean sustainable public transport through rebalanced investment and incentives away from road infrastructure.**
2. **Effective targets for new development in accordance with NPF "Smart Growth" objectives to ensure that the major percentage of new housing and employment locations be located with walkable access to public transport and safe cycling and walking routes.**
3. **Reiteration of 2009 Smarter Travel objective that the total kilometres travelled by the car fleet in 2020 will not increase significantly from 2009 total car kilometres.**
4. **Timetabled targets to meet and increase the national modal share in to 65% non-car based workplace travel within optimum timeframe, with higher targets for the five Metropolitan areas.**
5. **Meeting of National Cycling Framework 2020 targets that 10% of journeys be made by bicycle. Cycling route and safety enhancement to be provided for urban and village areas generally and not limited to the 5 Metropolitan areas.**
6. **Investment in public transport and cycling infrastructure to be complimented by road and car parking pricing measures, including for urban edge retail, to incentivise modal shift.**

The following recommendations of the deliberations of the Citizens' Assembly should be integrated the section **Sustainable Mobility:**

- **93% of members recommended that the number of bus lanes, cycling lanes and park and ride facilities should be greatly increased in the next five years, and much greater priority should be given to these modes over private car use.**
- **96% of members recommended that the State should immediately take many steps to support the transition to electric vehicles.**

5. A Strong Digital Economy

The draft NPF promotes Ireland as a "*sustainable international destination*" for data centres. This does not address analysis from EirGrid which shows that data centres already connected to the grid consume 250MW of electricity, sufficient to power more than 210,000 homes. Already permitted data center development means that another 550MW is due to be connected over the coming years, enough for almost 470,000 houses, while projects under discussion could consume as much as 1,000MW - enough for 850,000 homes.

The Eirgrid ten-year transmission forecast statement published in October 2017 states "*If all of these enquiries were to connect, the data centre load could account for 20pc of all-island peak demand,*" and *"Clearly the potential connection of demand on this scale is equivalent to decades of national demand growth*". The level of proposed connections is highest in north Dublin, where there is "*limited additional network capacity*" available to meet demand.

Current climate mitigation electricity generation targets are based on achieving a renewable percentage of total generation. The net benefit of this is undermined if an increase in electricity demand is allowed to occur without corresponding increase in renewable generating capacity.

Recommendations

1. **Provision of clearly defined timetables and targets for broadband**
2. **Any new data centre development be directly linked to the provision of new equivalent total renewable additional renewable energy capacity to the grid, in order to avoid dilution of current net tonnage reduction of climate emissions.**

6. Empowered Rural Communities

The current "*Action Plan for Rural Development, Realising our Rural Potential"* provides a well-considered and appropriate focus on strengthening rural towns and villages, which accords with the draft NPF. However the strategic objectives of the Action Plan, will be undermined if any significant level of one-off rural and ribbon housing is allowed to continue. It is recommended in the SEA Environmental Report for the NPF, that SEA and AA should be carried out on the Action Plan for Rural Development.

The Strategic Outcome for "Empowered Rural Communities" does not set any target for the level of housing for rural communities to be accommodated in villages and smaller towns (through initiatives such as 'serviced sites)

The conflict between the provisions for *"Ongoing Support through a well-funded Common Agricultural Policy for the Agri flood sector*" and meeting climate and biodiversity targets as well as food security is not addressed.

Recommendations

1. **Introduce effective climate, biodiversity and sustainability proofing for all Common Agricultural Policy (CAP) and other rural development funding.**
2. **Provide a clear target for Rural Broadband under the National Broadband Plan.**
3. **Ensure an effective target level of houses for rural communities to be located in villages and smaller towns with walkable access to services.**
4. **Identify the constraint and capacity level for any additional one off houses in the open countryside.**
5. **Roll out a serviced-sites initiative to provide a suitable alternative to one-off dwellings Land in serviced settlements, such as small towns and villages, could be purchased either directly by local authorities or via private initiatives and the required physical infrastructure put in place (e.g. sewers, water, roads, communications etc.). Individual plots would then be sold at a reasonable cost to people who wish to build their own dwelling, subject to certain design parameters. Such an initiative would provide the advantages of a one-off dwelling but in a serviced location, that supports the development of nucleated, walkable communities.**

7. Enhanced Urban Amenity

The need to enhance the quality of life in urban areas with "*green infrastructure*" for attractive walking and safe cycling routes, and enhancement of parks and amenity access and urban active travel are appropriately set out as objectives.

However the draft eschews any "Smarter Travel" modal share targets with a vague objective that: *"strategies to further support urban active travel will be developed and implemented".*

The investment outcomes proposed are deficient in targets, and in particular for sustainable mobility. No review and/or updating of the 2009 Smarter Travel targets for increasing modal share of non-single car commuting from 45% to 65% by 2020 is provided nor consideration of the national cycling targets. Limited initiatives for Smarter Travel demonstration projects in particular for Limerick City have been ineffective because the local authorities concerned did not amend development planning practices and policies to meet the Smarter Travel targets, such as excessive free parking provision in urban edge developments.

Recommendations

1. **Adopt a target that a significant percentage of new housing and employment location in the 5 Metropolitan city areas have walkable access to public transport, and safe cycling routes. Apply similar provision for the other large regional towns as defined in Section 3.6 of the NPF.**
2. **Revise and update Smarter Travel 2009 modal share targets for workplace and school travel, with progressive annual targets.**
3. **Amend Local authority development Plan parking standards to reduce car parking for residential and commercial development locations, to incentivize sustainable travel.**
4. **Introduce an effective parking charge regime for non-urban center located retail and commercial locations, to incentivize sustainable travel, and support Smarter Travel initiatives.**

8. Transition to Sustainable Energy

The summary definition in Section 9.1 provides the better stated objective of "*Transition to a Low Carbon and Climate Resilient Society."*

This identifies the need for "*new energy systems and transmission grids*" for a more distributed and renewables focused energy generating system.

On "Green Energy" it states as an objective to "*Deliver 40% of our electricity needs from renewable sources by 2020 with a strategic aim of in excess of 50% by 2030 and more by 2040 and beyond using wind, wave, solar biomass and hydro sources*".

This does not address the adequacy of the target if parallel mitigation on agriculture, transport heating and other sectors is not achieved. Furthermore, the use of a percentage based target rather than a net emission tonnage reduction target, undermines real emission cuts if electricity consumption continues to rise, including through the impact of data centers.

A provision is made for "*Consideration of carbon neutral electricity generation that would be facilitated through harnessing carbon capture and storage (CCS) using the Kinsale Head Gas Field."* This is an uncertain technology in practice and doubtful sustainable application on any scale, and is not part of the National Mitigation Plan.

Recommendations

Adapt actions set out by the Citizens Assembly referred to in in this submission.

9. Sustainable Management of Water and other Environmental Resources

This sets out considerations for Water, Effective Waste Management and Waste.

As with the other National Strategic Outcomes there is a lack of targets and timelines, except for that for waste water: *"Increased compliance with the requirements of the Urban Waste Water Directive from 39% today to 90% by the end of 2021, 99% by 2017 and 100% 2040.*

Recommendations

Apply effective timetable for achievement of standards and targets in Water Framework Directive, Waste Framework Directive, Air Quality Directive, Nitrates Directive and Marine Strategy Framework Directive.

10. Access to Quality Childcare Education and Health Care Services

The NPF needs to cater not only for a population increase but also for a dramatic shift in demographics over the next twenty years. Demographic changes expected to occur within the next two decades, including a reduction in Ireland's average household size, and increase in our labour force and a large proportion of our population will be over 65 years.

In line with population growth, educational requirements are set to increase. Supporting the development of a well-educated, well-skilled and adaptable labour force and creating and sustaining a strong pool of talented people of all ages will underpin Ireland's growth in the next two decades. The Department of Education and Skills

'Ireland's National Skills Strategy, 2025' have outlined that the number of children and young people attending school is expected to increase until 2025 and that demand for full time enrolment is expected to increase by 30% over the next 15 years.

Ireland's envisaged population growth will pose new challenges in meeting future demands for school places in Ireland. The development of schools need to be an integral part of compact sustainable development and the development of sustainable communities.

In the context of strengthening communities, the draft Guidelines on Sustainable Residential Development in Urban Areas (DEHLG, February 2008) draw particular attention to the need to plan for future schools needs and timely consultation with the Department of Education and Science. The Guidelines state that no substantial residential development should proceed without an assessment of existing schools capacity or the provision of new school facilities in tandem with the development.

Figures outlined in Section 5.3 (Transport) of this submission highlighted the modal share for school travel. The results published by the CSO highlight the high numbers of school journeys being taken by car (car passenger) and the low number utilising public transport, walking and cycling.

The Green Schools programme to engage with schools and encourage a shift away from the car as a means of travel has been a successful initiative which has seen positive results. The planning system can play a major role to further encourage walking and cycling. In order for this to be achieved, schools need to be linked in the most direct manner possible for pedestrians and cyclists and public transport access and existing links upgraded.

The NSO provides for the '*provision of new and refurbished schools on well-located sites within or close to existing built up areas, to meet demographic growth and the diverse needs to local populations*'. The future provision of schools needs to be tied into active and public transport.

Health Care

Section 3.4 of this submission have outlined major problems facing Ireland in relation to our level of chronic diseases and overweigh and obesity levels. Further pressure will be put on our health care system over the coming decades as a result of our aging population.

The ESRI has projected that the population over 65 will more than double to 1.3 millions (23% of total envisaged population growth in 2040. While this is something to be celebrated, it also poses challenges to our health care system which is currently under extreme pressure. The HSE 2017 report has stated that *the projected increase in demand for primary care services among older adults, arising from demographic change, will significantly challenge health planning.* The HSE has reported that in *2015, adults aged 65 years and over represented 13% of our population but used 54% of total hospital in-patient bed days and approximately 37% of day case and same day bed days. Adults aged 85 years and over represented 1.4% of our total population but used approximately 14% of the in-patient bed days.*

Notwithstanding the imperative need to prepare our health care system for the forthcoming challenges, the planning system also needs to address issues such as lonliness which is prevelent in our old age population. (Respond! Housing Association 2016)

Loneliness is often associated with feelings of isolation. Contributing factors to loneliness and isolation in the aging population include distance between family members (children and grandchildren moving further away) and loss of friends and families. The way we shape our built environment can also play a role alleviating feelings of isolation. Our settlement patterns have resulted in a physical move to locations out of main town and city

centres. This has resulted in the decline of areas, loss of trade and footfall and vitality. In order to create socially cohesive communities, it is imperative that the NPF address the revitalization of our rural towns and villages and city centres, which will play a key role in providing independence for the aging population. The exacerabtion of one-off housing will further deteriorate the fabric of our rural towns and villages and result in problematic access to vital health services (ambulance, hospitals).

Suburban housing and one-off dispersed housing can be socially isolating for the aging population. Housing within strong vibrant communities with convenient transport links and good public services (health care, libraries etc.) will contribute to continued independence and social involvement rather than social isolation and loneliness.

Recommendations:

- **Revise and update Smarter Travel 2009 modal share targets for workplace and school travel, with progressive annual targets.**
- **The future provision of schools needs to be tied into active and public transport.**
- **No new housing development shall be permissible which is greater than 15-minute walking distance from basic services and infrastructure e.g. public transport, supermarket, childcare facilities, school, post offices.**

8.0 IMPLEMENTATION AND GOVERNANCE

Chapter 9 (Section 9.2) sets out the proposed governance of the NPF with National Policy Objectives 63 to 69.

THE OFFICE OF THE PLANNING REGULATOR

It is proposed that the Planning and Development (Amendment) Bill "*will provide a legislative basis for Ireland 2040, its monitoring and review into the future and the Office of the Planning Regulator"*

The provisions of the Bill as currently tabled do not provide for effective or independent regulation, and do not meet the recommendations of the Mahon Tribunal for a Planning Regulator. The proposed regulator is being given what is only an advisory role and has no enforcement powers to achieve strategic objectives.

REGIONAL SPATIAL AND ECONOMIC STRATEGIES & METROPOLITAN AREA STRATEGIC PLANS

The NPF proposes a new definition for Regional Spatial and Economic Strategies (RSES) for the three Regions and Metropolitan Area Strategic Plans (MASPS) for the 5 cities.

This will require legislation, extensive research and consultation for which no timetable has been identified. It will require that individual local authorities in the three regions co-operate effectively in regional strategies based on urban and village consolidation and the curtailment of sprawl.

It poses an enormous challenge in defining new Metropolitan development boundaries for the 5 cities which will bear no relation to existing local authority boundaries.

This will not be achieved without effective oversight and regulation, including the capacity for both the Regulator, and under the provisions of the Aarhus convention for concerned individuals and parties, to seek remedy.

9.0 CONCLUSION

The application of Article 10 of the SEA Directive requires that a legally mandated enforcement regime, monitoring the achievement of mitigation measures, including implementation of timetables and targets and identifying at an early stage unforeseen adverse effects with the capacity to undertake appropriate remedial action.

Submission on SEA Environmental Report

Evaluation of RPS Environmental Report on Strategic Environmental Assessment (SEA) of Draft National Planning Framework

1 WHY A LEGALLY COMPLIANT SEA WITH ONGOING MONITORING AND APPROPRIATE REMEDIAL ACTION IS REQUIRED

The compliance of the Draft NPF SEA Environmental Report with the legal requirements of the SEA Directive 2001/42/EC needs to be assessed and validated.

The Environmental Report states that all of the environmental topics listed in the SEA Directive were scoped in for the assessment of the plan namely: *"Biodiversity, flora and fauna population human health, soil, water landscape air climatic factors, material assets and cultural architectural and archaeological heritage"*

Unlike the National Spatial Strategy (NSS) 2000 which had no legislative basis and which predated the implementation of the SEA Directive, the NPF and its integration with the National Investment Plan (NIP) is subject to SEA.

The implementation failure lessons from the NSS needs to be addressed. These are summarised Section 1.1 of the Environmental Report which states that *"some of the key ambitions of the NSS have not been realised with development driven planning and sprawl continuing to be prevalent*"

If the NPF is to avoid repeating the failure of the NSS, it must be based on a rigourous and legally compliant SEA, with its objectives and outcomes integrated with the National Investment Plan (NIP) to meet the requirement in Annex (1)(g) of the Directive to identify:

the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;

The adoption of plan is only part of the SEA process which then requires under Article 10 ongoing implementation action to:

"*monitor the significant environmental effects of the implementation*" of the plan *"in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action"*

Failure to carry out an effective SEA and put adequate monitoring and remedial action in place would expose Ireland to legal action at national and EU level.

2. OUTLINE OF LEGAL OBJECTIVES OF STRATEGIC ENVIRONMENTAL ASSESSMENT DIRECTIVE FOR NATIONAL PLANNING FRAMEWORK

The NPF is subject to requirement for SEA under Article 3(2) of Directive 2001/42/EC as it is a plan and programme for "*town and country planning and land use* "and which "*sets out the framework for future development consent of projects*" listed in the EIA Directive.

It needs to demonstrate exemplary engagement and compliance with the provisions of the SEA Directive and address the 2001 Guidance provided by the Commission: *"Implementation of Directive 2001/42 on the Assessment of the Effects of Certain Plans and Programmes on the Environment"*

http://ec.europa.eu/environment/archives/eia/pdf/030923_sea_guidance.pdf

In 2016 The Commission has published relevant European case law and further guidance which needs be addressed

http://ec.europa.eu/environment/eia/pdf/EIA_rulings_web.pdf

The preamble to the Directive states that it arises from a range of Treaty obligations and other considerations including under (1)

Article 174 of the Treaty provides that Community policy on the environment is to contribute to, inter alia, the preservation, protection and improvement of the quality of the environment, the protection of human health and the prudent and rational utilization of natural resources and that it is to be based on the precautionary principle. Article 6 of the Treaty provides that environmental protection requirements are to be integrated into the definition of Community policies and activities, in particular with a view to promoting sustainable development

And under (4) with regard to Biodiversity:

The Convention on Biological Diversity requires Parties to integrate as far as possible and as appropriate the conservation and sustainable use of biological diversity into relevant sectoral or cross-sectoral plans and programmers.

Article 3(5) of the Directive requires taking into account the criteria set out in Annex 1 of the Directive which sets out the considerations for determining the likely significant effects referred to in Article 5(3).

Article 3(1) of the Directive requires an environmental assessment in accordance with articles 4 to 9.

Article 4(1) requires that the assessment "*shall be carried out during the preparation of a plan or programme and before its adoption of submission to the legislative procedure*."

Article 5(1) requires that:

1. *Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.*

The provisions of Annex I are significant and detailed:

> *Information referred to in Article 5(1):*
>
> *The information to be provided under Article 5(1), subject to Article 5(2) and (3), is the following:*
> *(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;*

(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;
(c) the environmental characteristics of areas likely to be significantly affected;
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;
(f) the likely significant effects(1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;
(j) a non-technical summary of the information provided under the above headings.
(1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

There is a clear provision in Article (5 1) for the consideration of "reasonable alternatives"

Section 5.14 of the Commission guidance in referring to plans or programmes covering long time frames states: *"The alternatives chosen should be realistic. Part of the reason for studying alternatives, is to find ways or reducing or avoiding the significant adverse effects of the plan or programme".*

Article 5(2) and 5(3) sets out information requirements:

"*2. The environmental report prepared pursuant to paragraph 1 shall include the information that may reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme, its stage in the decision-making process and the extent to which certain matters are more appropriately assessed at different levels in that process in order to avoid duplication of the assessment.*
3. Relevant information available on environmental effects of the plans and programmes and obtained at other levels of decision-making or through other Community legislation may be used for providing the information referred to in Annex I".

Section 5. of the 2001 Commission guidance sets out extensive consideration of the "*scope and level of detail in the environmental report*" as defined in Article 5(4) of the Directive.

Section 5.26 specifically refers to the explicit provision for consideration of human health, biodiversity and cultural heritage in the Directive , which represented additional considerations to the annexes in the EIA Directive in place at that time.

Article 12(2) of the Directive is a provision of the quality of SEA Environmental Reports

The 2001 Commission Guidance sets out a key concern on the quality of the Environmental report on which the SEA is based that the information should be *"complete and reliable*" and be "*adequate for the purposes of the Directive*"

Article 6 sets out the consultation provisions for the Directive with 6(2) requiring that the public be given *"an early and effective opportunity within the appropriate time frames to express their opinion on the draft plan programme and the accompanying environmental report before the adoption of the plan or programme or its submission to the legislative procedure"*

Article 7 relates to transboundary impact which is not just relevant to Northern Ireland, but also applicable to Ireland's wider environmental footprint including per capita climate emissions.

Article 8 requires consideration on "*the opinions expressed pursuant to Article 6*" The Commission Guidance also notes that the parallel provisions of Articles 6(8) and 7 of the Aarhus Convention which require taking of due account of public participation.

Article 9 sets out provisions for information.

Article 10 sets out the provisions for monitoring.

> "*1. Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.*
> *2. In order to comply with paragraph 1, existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring*".

The provision of Article 10 are not just for monitoring, but the remediation of unforeseen adverse effects. Section 8.12 of the Commission guidance states that *" Unforeseen adverse effects is better interpreted as referring to shortcomings of the prognostic statements in the environmental report (e.g regarding the predicted intensity of the environmental effect) or unforeseen effects resulting from change of circumstances.. "*

Section 8.13 stats that "*One purpose of monitoring is to take appropriate remedial action if monitoring reveals adverse effects on the environment that that not been considered in the environmental assessment*"

Article 11 sets out the provision for relation to other community legislation:

> *"1. An environmental assessment carried out under this Directive shall be without prejudice to any requirements under Directive 85/337/EEC and to any other Community law requirements.*
> *2. For plans and programmes for which the obligation to carry out assessments of the effects on the environment arises simultaneously from this Directive and other Community legislation, Member States may provide for coordinated or joint procedures fulfilling the requirements of the relevant Community legislation in order, inter alia, to avoid duplication of assessment.*
> *3. For plans and programmes co-financed by the European Community, the environmental assessment in accordance with this Directive shall be carried out in conformity with the specific provisions in relevant Community legislation".*

The 2001 Commission Guidance set out consideration in relation Water Framework Directive, Nitrates Directive, Waste Framework Directive, Air Quality Framework Directive and Habitats Directive.

3. EVALUATION OF THE ENVIRONMENTAL REPORT COMPLIANCE WITH SEA DIRECTIVE ARTICLE 5(1) AND ANNEX 1

Table 3.3 of the Environmental Report: *"Requirements of the SEA Directive and Relevant Section in Environmental Report*" collates the 10 subsections (a) to (i) of Annex 1 of the Directive, with relevant chapter headings 2 to 9 in the Environmental Report.

This submission considers the contents of the Environmental Report in this sequence to determine in particular how the SEA will ensure meeting the core provision of the Directive for mitigation of *"any significant adverse effects on the environment* " proper monitoring of the "*significant effects* " and *"to be able to undertake appropriate remedial action"*

1. Contents and Objectives

Annex 1 (a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;

Chapter 2*: Content and Main objective of the Plan and Chapter 4 Review of the Relevant Plan Policies and Programmes*

Section 2.2 under *"Scope and Function of the Framework*" states that "*The starting point for the strategy is to lay the groundwork for a better quality of life for all and a basis for sustainable economic growth"*

Chapter 4 "*Review of Relevant Plans Polices and Programmes*" Section 4.3 is headed *"Relationship of the Draft NPF and other Plans Programmes and Policies*" and follows SEA headings

Conclusion:

1. The "*outline of the contents*" provides an appropriate summary of the draft plan.
2. Under main objectives of "*better quality of life for all*" and "*sustainable economic growth*" is not properly defined.
3. Under "*relationship with other relevant plans and programmes*" no consideration provided as to how potential contradictions with main objectives of NPF are to be resolved.

2. State of the Environment (Baseline)

Annex 1(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;

Chapter 5 contains *"Relevant Aspect of the State of the Environment (Baseline).*

5.1.1 Summarises the EPA identification of 4 key challenges and 7 key actions. Table 5.2 is "Summary of Current State of the Environment"

Conclusion.

Chapter 5 provides a range of data to inform the plan.

On "*on the current state of the environment*" there is a complete absence of consideration of the marine area outside designated coastal sites indicated in Map 5.1. The summary of EPA Data in table 5.2 does not include the wider marine area under the heading "*Inland and marine waters*". This is in contrast to the Northern Ireland data on the marine in Table 5.3.

While the provision of the Martine Strategy Framework Directive are summarised in 4.3.4 under "*Maritime Planning and Protection*" this is not carried out the" state of the environment "contents of Chapter 5. Give that the NPF Chapter 6 and National Policy Objectives 40 to 44 covers the entire marine area, this is a major lacuna.

3. Environmental Characteristics

Annex1(c) the environmental characteristics of areas likely to be significantly affected;

Chapter 5 contains *"Relevant Aspect of the State of the Environment (Baseline).*

Conclusion

Baseline data is an essential foundation of the EIA process. Adequate baseline data is required as the foundation for the ongoing monitoring of the plan, and to inform remedial action. The is a general lack of baseline data under most of the SEA headings e.g commuting modal share.

4. Existing Environmental Problems

Annex 1(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;

Provided in Chapter 5 "*Relevant Aspect of the State of the Environment (Baseline*).

Conclusion:

The state of Irish Biodiversity and the extent of habitats and species with "Bad" or "Unfavourable" status is identified. However the impact of current agricultural and forestry policies in causality is not properly addressed.

5. International Community or Member State level of Environmental Objectives

Annex1(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;

Appendix B sets out a comprehensive overview and summary of Ireland's relevant International, EU and National Commitments.

Chapter 4 "*Review of Relevant Plans Policies and Programmes*" refers to contents of Appendix B.

Conclusion

The environmental report has not addressed the level of Ireland's failure in climate action and biodiversity loss. Ireland has not adopted a National Mitigation Plan (NMP) for Climate Action to achieve the level of action required under the Paris Agreement, or the lower targets require under current EU Effort Sharing Decision.

See critique of NMP: Stop Climate Chaos Submission on NMP

6. **Likely Significant Effects on the Environment**

Annex1(f) the likely significant effects(1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;

This is provided in Chapter 8 *"Assessment of preferred scenario".*

Chapter 8 Assesses 69 of the 70 National Policy Objectives the objectives for the 5 urban centres and the 10 National Strategic Outcomes.

Conclusion

The assessment generally indicates that the Objectives and Outcomes are positive. However in all cases of positive impact mitigation is required on adverse effects eg. Data centres generating increase energy demand and climate impact

7. **Mitigation**

Annex 1(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;

Mitigation is the key provision of the SEA directive, to inform strategic plans. The measures proposed are set out in Chapter "9 *Mitigation and Monitoring"*

Section 9.3 covers "*Mitigation Measures and Recommendations"* Table 9.1 sets out "*Proposed SEA Mitigation measures Relating to Assessment of Policies (See chapter 8)* ". It is divided into subsections following the NPF chapter headings.

Conclusion

It is submitted that the mitigation measures for the 70 National Policy Objectives NPOs and 10 National Strategic Outcomes (NSO's) are largely deficient, and do not meet the requirements of the Directive. There is a general failure to mitigate climate impact of a population increase of over million as well as the strategic planning for the existing aging population.

The Mitigation Measures for the 10 National Strategic Outcomes are assessed sequentially as follows:

NSO 1: Compact Smart Growth.

No mitigation measures proposed.

In particular no mitigation is proposed for NS0 1.5 "*Improve accessibility to between centres of mass and scale and better integration with their surrounding areas*"

This is serious in impact. Without effective action to curtail car based sprawl and direction of transport investment to public transport and active reduction of car traffic generation, this measure will increase greenhouse gases, air pollution, sprawl, unhealthy lifestyles and undermine NSO1.1 and 1.2 on urban infill and improved liveability.

No land value taxation or other effective measures are proposed to curtail sprawl and encourage urban and village consolidation,

NSO 2: Enhanced Regional Accessibility

No mitigation measures proposed for the provision for "Inter Urban Roads" in undermining modal share of rail in inter urban transport and increasing car use and dependence greenhouse gases, air pollution, sprawl, unhealthy lifestyles and undermine NSO1.1 and 1.2 on urban infill and improved liveability.

No consideration is given to the concern under "*Enhanced Regional Accessibility*" in page 123 of the NPF that:" *Investment in connectivity first without urban consolidation measures will likely worsen the current trend towards sprawl*"

The only mitigation proposed is for NSO 2..2 that the Atlantic Economic Corridor (AEC) plan should be subject to SEA and AA. No mitigation is proposed to mitigate increasing car use and dependence greenhouse gases, air pollution, sprawl, unhealthy lifestyles in the three provisions for "*accessibility to the North West."*

NSO 3: High Quality International Connectivity.

The Mitigation measures for NSO 3.1 for Airports and for Ports NSO 3.2 entirely exclude any reference to climate emissions.

The only mitigation measure proposed for ports is "*to include consideration of rail alternatives to road based land transport connection at Tier I and Tier 2 ports in Ireland"*. No target is set for percentage of goods entering or leaving ports to use rail transport to reduce road freight impact.

No mitigation is proposed in shipping air pollution and climate emissions.

No mitigation of aviation growth is proposed by developing low carbon sail rail connection with Britain to reduce aviation impact and emissions.

While it is proposed under 3.1 that SEA and AA be made a requirement for relevant airports, no consideration is given in this overarching AA for future development to 2040 as to how the climate impact of increasing air travel can be mitigated.

NSO 4: Sustainable Mobility

No mitigation measures are proposed. No consideration is given to climate, and no mitigation target for decarbonisation of public transport is set.

The Environmental Report as a whole and in particular the NSO 4 outcomes for sustainable mobility are seriously undermined, if not nullified by the lack of the timetabled and modal share targets, as was contained in Department of Transport Smarter Travel 2009

In particular NSO 2 on "Enhanced Regional Connectivity" conflicts with NSO 4, has no mitigation measures to reduce car dependence and provides no modal share target increase for rail use

No air quality targets are provided for any of the transport sectors.

No active travel targets are set to reduce obesity.

NSO 5: A Strong Digital Economy

No mitigation is proposed for the electricity generation demand and climate emission impact of NSO.5 to promote Ireland as a location for data centres

NSO 6: Empowered Rural Communities

No mitigation is provided in identifying a carrying capacity level for additional one off houses capable of being accommodate in the open countryside without causing the further undermining of villages, increased service cost for an aging population, increased cost of maintaining climate vulnerable electricity and other infrastructure, and increased suburbanisation of the rural landscape.

The mitigation measures recommend an addition objective to promote electric vehicles. However this does not address unstainable car use and dependency, or the generation of new car dependent housing and other development in rural area, an undermining the attractiveness or potential of cycling for shorter journeys

NSO 7: Enhanced Urban Amenity

No mitigation measures are proposed.

No measure to charge and restrict free parking urban edge retail which undermines function and status of urban centres and exacerbates car based sprawl.

No mitigation measures to protect historic urban centres and areas of architectural heritage quality from impact of inappropriately scaled new development

No identification of World Health Organization (WHO) standards as urban air quality target

NSO 8: Transition to Sustainable Energy

The only measure proposed is *"a review of electric charging infrastructure across Ireland*" to achieve 2030 zero emission or near zero emission target for new cars and vans sold by 2030.

No mitigation is provided for the increased energy demand and climate impact of the new housing, workplaces, data centres and other development projected in the NPF

NSO 9: Sustainable Management of Water and other Environmental Resources

Additional population and development will place significant additional burden on resources, and waste generation

The only mitigation measure proposed is to have "*Specific regard to the mitigation measures in the three Regional Waste Plans (2015) and the National Hazardous Waste Management Plan"*

This is only referring to mitigation measures already in place and does not address the waste reduction targets required under EU Circular Economy policy.

No measure is provided to integrate the NPF with EU Water Framework Directive, in particular for River Basin Management Plans

The mitigation measure for NPO 27 on water does not contain any target.

Mitigation measures for the wider marine area are entirely lacking including requirement for achieving including Good Environmental Status (GES) under the Marine Strategy Framework Directive, fish stock protection , sea bird feed source protection, management of any continuation of oil and gas exploration and marine litter.

There are no effective mitigation measures to address the additional food supply demand and agricultural and aquaculture impact of an additional one million population on biodiversity.

No measure to address the impact of increased land disturbance in spreading invasive species.

There is no mitigation measure to protect high quality mineral soils for horticulture.

There is no measure to protect the high carbon storage in peat soils.

No air pollution mitigation target including for road traffic, shipping, aviation and solid fuel combustion.

No mitigation measures for areas for architectural heritage, archaeological cultural heritage and landscape sensitive areas.

NSO 10: Access to Quality Childcare Education and Health Services

There are no mitigation measure to address the health service demand of the combination of an increased population and an existing aging population

No targets are set for the number of new and existing housing units able to sustain active travel lifestyles to have walkable access to community facilities, public transport and safe cycling routes, and reduce burden on health services.

8. Alternatives

Annex1 (h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;

Chapter 7 considers *Alternatives*

The consideration of alternatives focuses on the key strategic objective of the draft NPF for the location, distribution and settlement pattern of projects population growth, in comparison to the "do nothing" scenario.

Conclusion.

The alternative assessed are based on realistic options and scenarios

9. Monitoring

Annex1(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;

Monitoring along with mitigation, is the key provision of the SEA Directive.

The proposed monitoring of the NPF is contained Chapter 9 "*Mitigation and Monitoring* in Table 9 under 4 headings: Strategic Objective, Target, Indicator and Data source.

Conclusion;

The strategic objectives are generally weak and undefined and are not integrated with EU international and EU obligations.

Objective 1 Population and Human Health

No measurable quantifiable Objectives. The only specific mitigation target is to increase by 20% the proportion of population undertaking regular physical activity.

Objective 2 Biodiversity Flora and fauna

Target does not reflect MSFD and Habitats Directive obligations. Objectives are non-specific.

Objective 3 Soils

Only specific target to limit built surface cover nationally to below the EU average of 4%. No provision on soil protection including carbon storage of peat soils.

No mitigation measure to stabilize carbon in the 20% of national area in peat soils, containing 75% of organic soil carbon, or protect high quality mineral soils for horticulture.

Objective 4 water

River Basin Management Plan target is not defined.

Water Framework Directive targets are not identified.

Objective 5 Air Quality

Air Quality is left to be resolved in future National Clean Air Strategy.

No identification of World Health Organization (WHO) standards as targets for Air Quality.

No target figure is provided for decrease in proportion of journeys by private fossil fuel based car.

Objective 6 Climatic factors

Relies on deficient National Mitigation Plan

Objective 7 Material Assets

Only specific target is for broadband capacity

Objective 8 Archaeology Architectural and Cultural Heritage

No specific provision. Target for "no unauthorized physical damage of alteration of the context of cultural heritage features" is already provided for in law

Objective 9 Landscape

No specific objectives or targets.

10. Non-Technical Summary

Annex1(j) a non-technical summary of the information provided under the above headings. (1) These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

Conclusion

The Non-Technical Summary reflects the overall content of the Environmental Report in generally identifying the policies and outcomes as proposed as "positive," while at the same time failing to provide for the monitoring, mitigation and remedial action required to address adverse impacts

11. Cumulative Impacts/ Interactions

Annex 1(f) provides for consideration of interactions

Section 8.3.10 of the Environmental Report covers "*Cumulative Impacts*" and interactions

There is a serious deficiency in addressing interactions.

The policies on enhancing the status of urban areas create potential conflict with architectural heritage through inappropriately scaled new buildings.

The measures proposed for electric vehicle transition is not reconciled with curtailment of resource consumption, sprawl, congestion and unhealthy lifestyle travel patterns.

GENERAL CONCLUSION

Section 9.1 pf the Environment Report acknowledges the requirement of Article 10 of the Directive:

"that monitoring be carried out in order to identify and an early stage unforeseen adverse effects due to the implementation of the draft NPF, with the view to taking remedial action where adverse effects are identified through monitoring"

However no further information is provided on meeting this obligation.

If any adverse impact arises e.g the road investment measures proposed in the NPF increase greenhouse gas emissions, air pollution, or if electric vehicle transition fails to reduce congestion and car dependent sprawl continues to worsen.

No mechanism for remedial action of adverse effects is provided.

The SEA Environment Report is systemically deficient in meeting the obligations of the Directive.

The tabling of an entirely revised SEA Environmental Report is required with clearly identified and timetabled and targeted mitigation measures, effective monitoring in all areas and the legal implementation regime to take remedial action where adverse effects are identified through monitoring.

ENDNOTES

[i] Ceballoa, G, Ehrlich, P & Dirzo, E. (2017) *Biological annihilation via the ongoing sixth mass extinction signaled by vertebrate population losses and declines*. Proceedings of the National Academy of Sciences of the United States of America. Vol. 144 no. 30

[ii] European Commission (2016) Next steps for a sustainable European future - European action for sustainability: Questions & Answers. http://europa.eu/rapid/press-release_MEMO-16-3886_en.htm

[iii] European Commission (2016) Communication from the Commission to the European Parliament, The Council, The European Economic and Social Committee and the Committee of the Regions - Next steps for a sustainable European future. https://ec.europa.eu/europeaid/sites/devco/files/communication-next-steps-sustainable-europe-20161122_en.pdf

[iv] Órla Ryan. (5th Nov. 2017) '*Higher taxes and more bus lanes: How the Citizens' Assembly wants Ireland to tackle climate change*'. The Journal. http://www.thejournal.ie/article.php?id=3681342

[v] Órla Ryan. (5th Nov. 2017) '*Higher taxes and more bus lanes: How the Citizens' Assembly wants Ireland to tackle climate change*'. The Journal. http://www.thejournal.ie/article.php?id=3681342

[vi] Climate Change Advisory Council. (2017) Periodic Review Report 2017. http://www.climatecouncil.ie/media/CCAC_PERIODICREVIEWREPORT2017_Final.pdf

[vii] John Fitzgerald (28th July 2017). 'Pay now, be rewarded later – the political hot potato of climate change'. Irish Times. https://www.irishtimes.com/business/economy/pay-now-be-rewarded-later-the-political-hot-potato-of-climate-change-1.3169003

[viii] Houses of the Oireachtas, Committee on Budgetary Oversight, Report of the Committee Pre-Budget 2018, October 2017, p.43

[ix] Fumkin, H. (2002) 'Urban Sprawl and Public Health. Public Health Reports', Public Health Reports, 17, pp. 201-208

[x] Jennings, S (2014) 'Preventing chronic disease: defining the problem'. http://www.lenus.ie/hse/bitstream/10147/338212/3/PreventingChronicDisease_DefiningtheProblem.pdf

[xi] Department of Health, Healthy Ireland, Department of Transport, Tourism and Sport. (2016) 'Get Ireland Active! National Physical Activity Action Plan for Ireland. http://health.gov.ie/wp-content/uploads/2016/01/Get-Ireland-Active-the-National-Physical-Activity-Plan.pdf

[xii] RTE (6th May 2015) 'Varadkar defends Government record on tackling obesity'. https://www.rte.ie/news/2015/0506/699023-obesity/

[xiii] Department of Health,(2016) 'A Healthy Weight for Ireland, Obesity Policy and Action Plan 2016'. Dublin: Stationary Office. http://health.gov.ie/wp-content/uploads/2016/09/A-Healthy-Weight-for-Ireland-Obesity-Policy-and-Action-Plan-2016-2025.pdf

[xiv] US EPA. 'Heart Disease, Stroke, and Outdoor Air Pollution'. https://www3.epa.gov/airnow/heartflyer.pdf

[xv] PEA (2016) 'Ireland's Environment An Assessment 2016). http://www.epa.ie/pubs/reports/indicators/SoE_Report_2016.pdf

[xvi] ESB (2017) 'ESB Networks – Our Infrastructure'. https://www.esbnetworks.ie/who-we-are/our-networks

[xvii] EuroStat. (2016)' Sustainable development in the European Union A Statistical Glance from the Viewpoint of the UN Sustainable Development Goals'. http://ec.europa.eu/eurostat/documents/3217494/7745644/KS-02-16-996-EN-N.pdf/eae6b7f9-d06c-4c83-b16f-c72b0779ad03

[xviii] Department of Transport. (2009)'Smarter Travel – A Sustainable Transport Future.A New Transport Policy for Ireland 2009-2020'. http://www.smartertravel.ie/sites/default/files/uploads/2012_12_27_Smarter_Travel_english_PN_WEB%5B1%5D.pdf#overlay-context=content/publications

[xix] CSO (2017) 'Sustainable Development Indicators Ireland 2017'. http://www.cso.ie/en/releasesandpublications/ep/p-sdii/sustainabledevelopmentindicatorsireland2017/