

Submission on the Draft Regional and Economic Strategy for the Northern and Western Region

This consultation on the draft RSES

While I welcome the opportunity to make a submission on the draft RSES my strong preference would have been to have had an opportunity to participate in a collaborative process with others as part of the preparation of the draft RSES. There must be early and effective public engagement – collaboration in the preparation of strategies and plans is best practice rather than consultation after the major decisions have already been made.

The National Planning Framework (NPF) is clear that “Business as Usual” will not achieve the objectives of the NPF – this consultation represents “Business as Usual”.

General comments on the RSES Document

The draft RSES for the Northern and Western Region is far too long at 312 pages. This is mainly because the document is too verbose and there is much repetition in it.

The length, verbosity, repetition and lack of cohesion make the document very difficult to read. It needs substantial editing to produce a final document which is succinct and accessible by the public.

There should be a concise Executive Summary that members of the public can read more easily so that they can get an overall understanding of what is proposed. After that, they can read the sections of the main report that they have a particular interest in.

All the Key Policy Objectives should be put together in an Appendix for convenience of readers.

Vision

There should be a succinct vision statement which conveys to all concerned where it is that this strategy is designed to get us to. There is no such vision statement in the draft RSES.

In Section 2.1 NWRA: Approach to strategy, it is stated that *“Strategy is concerned with getting from where we are to where we want to be.”* The “we” should be those who live and work in the Northern and Western Region. The final document should contain up-front a shared vision statement, developed in collaboration with those who live and work in the region, which represents *“where we want to be”*. There may be a case for vision statements for each sub-region based on its particular strengths and assets. One way in which shared vision statements could be developed in collaboration with the public would be to engage with the Public Participation Networks (PPNs) that exist throughout the region who could in turn engage with their communities. There is no evidence in the draft RSES that there has been any collaboration whatsoever with the PPNS.

Sustainable, sustainability and sustainable development

What is meant by ‘sustainable’, ‘sustainability’ and ‘sustainable development’ in the draft RSES?

‘Prosperity’ is mentioned but is often qualified to ‘economic prosperity’. What is meant by prosperity?

These are critical questions that have not been addressed in the draft RSES.

The final RSES must clearly define what is meant by “sustainable”, “sustainability”, “sustainable development” and “prosperity”. These objectives will only be achieved if we all have a clear and unambiguous understanding of what they are.

A ‘Sustainability Framework’ is required rather than a ‘Growth Framework’

The draft RSES adopts a Growth Framework. This is a fundamental and fatal flaw. One cannot have infinite growth on a planet with finite resources! This fact is ignored in the draft RSES.

"Anyone who thinks that you can have infinite growth on a planet with finite resources is either a madman or an economist." - Sir David Attenborough

According to the Global Footprint Network, if everyone in the world used as much of the earth’s biocapacity as we in Ireland did in 2014, we would need 2.8 planets? The world’s current population would need 1.7 planets based on its current use of the earth’s resources - we have only 1 planet!

In 2018, humans used up more of Earth's resources than it can regenerate within one year as of August 1, 2018, according to the Global Footprint Network. Last year's Earth Overshoot Day was the earliest ever. <https://www.footprintnetwork.org/our-work/ecological-footprint/>

We are currently stealing the earth’s resources from future generations to feed our unsustainable lifestyles. The draft RSES will only perpetuate this into the future.

A ‘Sustainability Framework’ rather than a “Growth Framework” is what is required for the sustainable development of the Northern and Western Region. One such ‘Sustainability Framework’ is the One Planet Living® framework developed by UK charity Bioregional more than 20 years ago. It adopts a holistic approach and is based on 10 principles.

<https://www.bioregional.com/one-planet-living>

A sub-committee of Engineers Ireland West Region, comprising of 10 senior Chartered Engineers representing different disciplines of engineering, published a major report in 2011 entitled “Engineering the West to 2020 – Reinventing our Region. They consulted with leaders in business, industry and academia, government agencies and local authorities during the

preparation of the report. The report recommended the adoption of the One Planet Living (OPL) framework and its 10 principles. The current status of the West Region was analysed under each OPL principle, the target to be achieved by 2020 was identified and the path to the target was mapped out. The report contains 60 key recommendations and concludes with the next steps that need to be taken to achieve the sustainable development of the West Region. The report is available at the following link:

<http://www.engineersireland.ie/EngineersIreland/media/SiteMedia/groups/regions/west-region/EIWR2020The%20Bookev10.pdf>

I suggest that the NWRA adopt the One Planet Living framework and prepare the final RSES following the same methodology as that used in the preparation of Engineers Ireland West Region's report. The One Planet Living framework takes a holistic approach to sustainable development, the 10 principles are easily understood by all. It has been successfully implemented in various locations in the UK and around the world over the past 25 years. The following are the 10 principles:

1. Health and happiness – Encouraging active, sociable, meaningful lives to promote good health and wellbeing.
2. Equity and local economy – Creating safe, equitable places to live and work which support local prosperity and international fair trade.
3. Culture and community – Nurturing local identity and heritage, empowering communities and promoting a culture of sustainable living.
4. Land and nature – Protecting and restoring land for the benefit of people and wildlife.
5. Sustainable water – Using water efficiently, protecting local water sources and reducing flooding and drought.
6. Local and sustainable food – Promoting sustainable humane farming and healthy diets high in local, seasonal organic food and vegetable protein.
7. Travel and transport – Reducing the need to travel, and encouraging walking, cycling and low carbon transport.
8. Materials and products – Using materials from sustainable sources and promoting products which help people reduce consumption.
9. Zero waste – Reducing consumption, reusing and recycling to achieve zero waste and zero pollution.
10. Zero carbon energy – Making buildings and manufacturing energy efficient and supplying all energy with renewables.



In 2018 Oxfordshire County Council and Bioregional Oxfordshire agreed to work together to create a ‘One Planet Oxfordshire’. <https://www.bioregional.com/bioregional-oxfordshire> This is building on the success of One Planet Living in the town of Bicester in Oxfordshire. While geographically the Northern and Western Region is much larger in land area and more dispersed than Oxfordshire they are not all that different in population terms. See the table below:

	Northern & Western Region	Oxfordshire
Population	847,442	682,400 (estimated mid 2017)
Largest settlement	Galway	Oxford
Population of largest settlement	79,934 (census 2016)	150,200 (in 2011)

I believe that the NWRA could learn much from the ongoing ‘One Planet Oxfordshire’ project.

The Sustainable Development Goals (SDGs)

In Section 1.8 of the draft RSES it is stated that the government is committed to the “implementation of the 2030 Agenda for Sustainable Development and its 17 SDGs”.

It must be clear from the RSES how each Regional Policy Objective will contribute to the implementation of specific SDGs. That is not the case regrettably. This must be addressed in the final RSES.

I have recommended above that all the Regional Policy Objectives should be included together in an Appendix to the RSES and that should also show the specific SDGs that each Regional Policy Objective will contribute to implementing.

Proper Planning for Sustainability

“Failing to plan is planning to fail” – Benjamin Franklin

The adage often attributed to Benjamin Franklin “failing to plan is planning to fail” couldn’t be more appropriate than it is in the case of spatial planning. Ireland’s problems with unsustainable urban sprawl and one-off rural housing have led to an unsustainable dependence on private car-based transport, condemning people to long commutes (Dr Mary Kelly, former Chair of An Bord Pleanála) with implications for both families and communities. In January 2018, in an article by Paul Melia, Dr Mary Kelly, then Chair of An Bord Pleanála, is quoted as saying “All you’re doing is pushing people further out and forcing them into terrible commuting patterns which we saw before in the Celtic Tiger.”

“Those who fail to learn from the past are doomed to repeat it.” – Sir Winston Churchill

The NWRA needs to be adequately resourced to prepare the Regional Spatial and Economic Strategies that represent the second tier of the planning framework directly below the National Planning Framework. One can hardly consider that 3 qualified planners represent an adequate planning resource to undertake the preparation of the RSES for such a large region.

Galway city is on the cusp of very significant regeneration on centre city sites such as the brown field lands at the Inner Harbour, Ceannt Station, the Harbour lands and the regeneration sites to the east of Eyre Square, Nun’s Island, the Dyke Road and Headford Road. The appropriate way to plan for the sustainable development of these lands would be by the preparation of statutory Local Area Plans. What has happened instead so far is that we have had a masterplan prepared by a developer for the Inner Harbour with no public consultation whatsoever, a masterplan being prepared for Ceannt Station and Nun’s Island by developers with some element of public consultation. The Galway Harbour Company (the developer) was recently granted funds under the Urban Regeneration and Development Fund to prepare a masterplan for the Harbour Lands. Galway City Council says it doesn’t have the resources to prepare Local Area Plans for these sites. This is ‘developer-led planning’ which was the cause of so much damage during the Celtic Tiger years.

While welcoming the publication of the Final Report of the Mahon Tribunal on the 22nd March 2012 Jan O’Sullivan, Minister for Housing and Planning, said that **“developer-led planning has been a disaster, and we need to rebuild confidence in the planning system as an evidence-based, open, clear, and democratic process.”**

In a presentation entitled “Planning for a Different Future” to the Sustainable Communities and Housing Conference in 2009, the chairman of An Bord Pleanála at that time, John O’Connor, having reflected on the lessons of the Celtic Tiger era, said that the **“future must be different”**. One of the means John O’Connor proposed to achieve a different future was that there must be “properly adopted LAPs [Local Area Plans] rather than ‘frameworks’ or developer ‘master plans’”.

All planning authorities should be appropriately resourced to enable them to prepare the County and City Development Plans and the Local Area Plans that are necessary to achieve the sustainable development that the National Planning Framework has the objective of achieving.

Climate Action

I am very concerned by the lack of any sense of urgency and purpose in relation to climate action given the context as set out below. I sincerely hope this will be addressed in the final RSES.

Context

The following are speeches and reports relevant to Climate Change during this past year, in chronological order:

An Taoiseach in the European Parliament, 17th January 2018

An Taoiseach acknowledged that Ireland is falling behind the rest of Europe and gave his commitment to taking greater action. “As far as I am concerned, we are a laggard. I am not proud of Ireland’s performance on climate change,” he said. This was in the context of the Climate Change Performance Index 2018 which singled out Ireland as the worst performing country in Europe for taking concrete action to tackle climate change.

Citizens’ Assembly April 2018

The Third Report and Recommendations of the Citizens’ Assembly, which addressed “How the State can make Ireland a leader in tackling Climate Change”, includes the following two recommendations relating to sustainable transport amongst its recommendations:

- “viii. 93% of the 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.”
- “x. 92% of the 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 2-to-1 to facilitate the broader availability and uptake of public transport options with attention to rural areas.”

Climate Change Advisory Council Report, July 2018

I quote the following sections from this report in relation to transport which confirm that emissions from transport are trending upwards and the dominant position of the private car as a mode of transport:

3.2 Future Sectoral Greenhouse Gas Emissions

“Emissions from transport are projected to increase by 17% to 18%, or between 2.1 and 2.5 million tonnes of carbon dioxide equivalent, by 2020, relative to 2016 levels based on the two projected scenarios. Overall growth in transport emissions reflects strong growth in diesel fuel consumption in private cars and freight to 2025.”

5.1.3 Transport

“The transport sector is not contributing towards the 2020 targets and there has been little progress towards the long-term low-carbon transition. The relationship between income (as measured by modified gross national income at current prices) and transport emissions has weakened in recent years but remains close. Emissions fell during the recession in line with falling economic activity but, since 2012, the overall picture in transport is that emissions are again increasing significantly with greenhouse gas emissions at their highest level since 2010. According to the EPA, this is the fourth successive year of increases in transport emissions following five consecutive years of decreases since 2007.² If this increasing trend continued, transport emissions would return to their 2007 peak by 2022.”

“Passenger Transport

Key sectoral indicators are pointing in the wrong direction at a national level. As well as economic growth and higher levels of activity, urban sprawl and spatial planning decisions have caused high levels of emissions and congestion on roads that lead to major centres of employment. The National Travel Survey 2016 found that, at a national level, journey distances and durations are increasing. Almost three-quarters or 74.3% of all journeys were made by car, a less than 1% difference between the 2013 and 2014 survey results. Only about 5 to 6% were car passenger journeys, meaning most car journeys were single occupant. Ireland's estimated emissions from cars, at 1.6 tonnes of carbon dioxide per capita, are the fifth highest among EU Member States. The Census 2016 found that nationally 65.6% of those commuting to work travelled by car."

Global Footprint Network, August 2018

Earth Overshoot Day marks the date when we (all of humanity) have used more from nature than our planet can renew in the entire year. In 2018, it fell on August 1. At this rate we need 1.7 planets to support humanity. We have only one planet!

IPCC Special Report on Global Warming of 1.5°C, October 2018

I quote the following from the IPCC Press Release of the 8th October 2018 following publication of the IPCC Special Report on Global Warming of 1.5°C":

"Limiting global warming to 1.5°C would require rapid, far reaching and unprecedented changes in all aspects of society, the IPCC said in a new assessment. With clear benefits to people and natural ecosystems, limiting global warming to 1.5°C compared to 2°C could go hand in hand with ensuring a more sustainable and equitable society, the Intergovernmental Panel on Climate Change (IPCC) said on Monday."

Living Planet Report 2018, October 2018

The Living Planet Report identified climate change as one of the contributors to the loss of nature on the planet.

"This report's Living Planet Index also outlines how much nature we are losing. It shows an overall decline of 60% in species population sizes between 1970 and 2014, while current rates of species extinctions are 100 to 1,000 times higher than the background rate (the extinction before human pressure became a prominent factor). Other indicators measuring different changes in biodiversity all paint the same picture – that of dramatic, continued loss."

"We are the first generation that has a clear picture of the value of nature and the enormous impact that we have on it. We may also be the last that can act to reverse this trend. From now until 2020 will be a decisive moment in history."

Speech by Minister Richard Bruton at the E.U. Climate-KIC Summit, Dublin Castle, 7th November, 2018

In his speech the Minister acknowledged that “Ireland is far off course to achieve the CO₂ targets which we have committed to”. He expressed his ambition “to make Ireland a leader in responding to climate change, not a follower” and acknowledged that “that will require a significant step change across government”. The Minister went on to say:

“It will require a revolution in how we live. Every person, every community, every business, every home and every school will have to make changes in the way we live and work and learn. Nothing less will do if we are to make the changes that are needed to create a sustainable future for everyone.”

The Minister then went on to refer to the National Planning Framework as follows:

“Project Ireland 2040, and the ten year National Development Plan which underpins it, is the first time an Irish Government has ever attempted to ensure that future growth is compact, connected, regionally balanced and sustainable.

Implementing this vision, and ensuring that the capital investments which are made, deliver that integrated vision will be a crucial challenge which we must crack. How we roll out this €116 billion investment [and in particular the €30 billion on Climate Action and Sustainable Transport] can create a profound shift in behaviour patterns.

Price matters when it comes to choices. We must discourage new private or public investments being made now which lock us in to high carbon patterns of living.”

Opening Statement by Secretary General of the Department of Public Expenditure and Reform, Robert Watt, at the Oireachtas Joint Committee on Climate Action, 14 November 2018

Mr Watt in his address recognised that “The climate actions and policies that we have pursued to date have evolved to be compatible with existing policy priorities rather than specifically targeted at delivering the kind of change we need at the scale we need. In other words, we have pushed open doors in respect of policy options which have been easy and uncontentious.”

He also explained how it is now intended to price the carbon emissions of any new Government investment at the price it will cost us to eliminate those emissions at a later date:

“In terms of project appraisal, we have published some very significant proposed reforms to the Public Spending Code. In a major departure, we will now require all Government investment projects to price any future greenhouse gas emissions at the estimated cost that Irish society will have to bear in reaching our climate targets. In effective terms, this triples the cost of greenhouse gas emissions that applies today, with the price reaching €32 a tonne by 2020, €100 a tonne by 2030 and €265 a tonne by 2050.

This will reduce the economic viability of projects that produce emissions and critically place a high value on projects that cut emissions.

We are also lowering the discount rate that applies to Government investment appraisal from 5% to 4% and for longer term projects, this discount rate will decline over time. These reforms mean that investment decisions must fully reflect the climate consequences.”

In his conclusion Mr Watt admitted that “To achieve the decarbonisation that the International Panel on Climate Change thinks is necessary, will require changes to society on a scale not seen since the industrial revolution.”

‘A Clean Planet for All’, November 2018

I include the following extract from the introduction to the European Commission’s communication of the 28th November 2018, ‘A Clean Planet for all: A European strategic long-term vision for a prosperous, modern, competitive and climate neutral economy’.

“1. INTRODUCTION – THE URGENCY TO PROTECT THE PLANET”

Climate change is a serious concern for Europeans. The current changes in our planet's climate are redrawing the world and magnifying the risks for instability in all forms. The last two decades included 18 of the warmest years on record. The trend is clear. Immediate and decisive climate action is essential.”

COP24, Katowice, Poland, December 2018

I quote the following from the transcript of Sir David Attenborough’s speech on the 3rd December 2018 when he represented ‘The Voice of the People’:

“‘We the peoples of the United Nations’. These are the opening words of the UN Charter. A charter that puts people at the centre. A pledge to give every person in the world a voice on its future. A promise to help protect the weakest and the strongest from war, famine and other man-made disasters.

Right now, we are facing a man-made disaster of global scale. Our greatest threat in thousands of years. Climate Change. If we don’t take action the collapse of our civilisations and the extinction of much of the natural world is on the horizon.”

Sir David Attenborough concluded his speech as follows:

“The People have spoken. Leaders of the world, you must lead. The continuation of our civilisations and the natural world upon which we depend, is in your hands.”

Climate Change Performance Index December 2018

The CCPI 2018 published in December 2018 ranked Ireland 48th out of the 56 countries evaluated. The report states that Ireland is “still rated as the worst-performing EU country in the CCPI, Ireland reaches position 48 and remains in the group of *very-low* performing countries. Ireland is the worst performer in the EU. The report concludes that “existing climate mitigation efforts will not enable Ireland to achieve either its EU 2020 or 2030 targets domestically. The long-standing lack of implementation of substantive measures to put the country on a well-below-2°C pathway results in a *very low* rating for Ireland’s national policy performance.”

From infrastructure costs to health and environmental impacts - European Commission shares first findings on the true costs of EU transport 17 December 2018

I include the following extracts from this publication which confirms that the users do not pay the full costs of any particular transport mode – the balance unpaid falls on society. “Road leaves the biggest amount of external cost unpaid” which “society largely pays for”, “rather than the user or polluter.”

“The preliminary findings suggest that, for the time being, society largely pays for these costs, rather than the user or polluter. This is generally true for all transport modes.”

“Key preliminary insights:

- The total external costs of transport amount to the equivalent of around € 1 000 billion annually, which corresponds to almost 7% of EU28 GDP.
- The main contributors to this are **environment (carbon, noise and pollution), accidents and congestion.**
- Road is the largest contributor, accounting for $\frac{3}{4}$ of total external costs in absolute terms, and also the mode which leaves the biggest amount of external cost unpaid.
- For all transport modes, the total costs (external and infrastructure) are substantially higher than what the user pays.”

Galway Metropolitan Area Strategic Plan

I am very familiar with the current Galway City Development Plan 2017-2023 and the development plan that preceded it. When I read the MASP in the draft RSES I experience a very strong sense of déjà vu. It appears that this section may have been authored in large part by Galway City Council. The intention of the NPF was that there would be an end to “business as usual” but this represents “business as usual”. Radical change is required to address climate change, to get away from car-dependent travel and to provide the right homes in the right places for our people. There is no evidence at all of the radical change that is required.

Homelessness

It is remarkable that homelessness doesn't mention even one single mention in the draft RSES. There are thousands of adults and children in the region who are homeless, thousands more at risk of becoming homeless and many thousands more in inappropriate accommodation.

When Ireland experienced its first foot and mouth disease outbreak since 1941 in March 2001 the government reacted with urgency and purpose. That was a crisis! The fact that thousands of adults and children are currently homeless is not perceived as a crisis by the government. It appears that the NWRA does not perceive it to be a crisis either. This is not acceptable.

The final RSES must recognise homelessness to be the crisis that it is and plan to address it with urgency and purpose.

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