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Sent: 18 April 2019 22:15
To: DevelopmentPlan@midulstercouncil.org
Subject: Friends of the Earth NI representation to MUDC LDP DPS consultation
Attachments: FoE representation to MUDC LDP DPS consultation 18.04.19.pdf

Hello,

Please accept the attached document as our representation to the Mid Ulster District Council's consultation on your Local Development Plan – Draft Plan Strategy.

Kind Regards,

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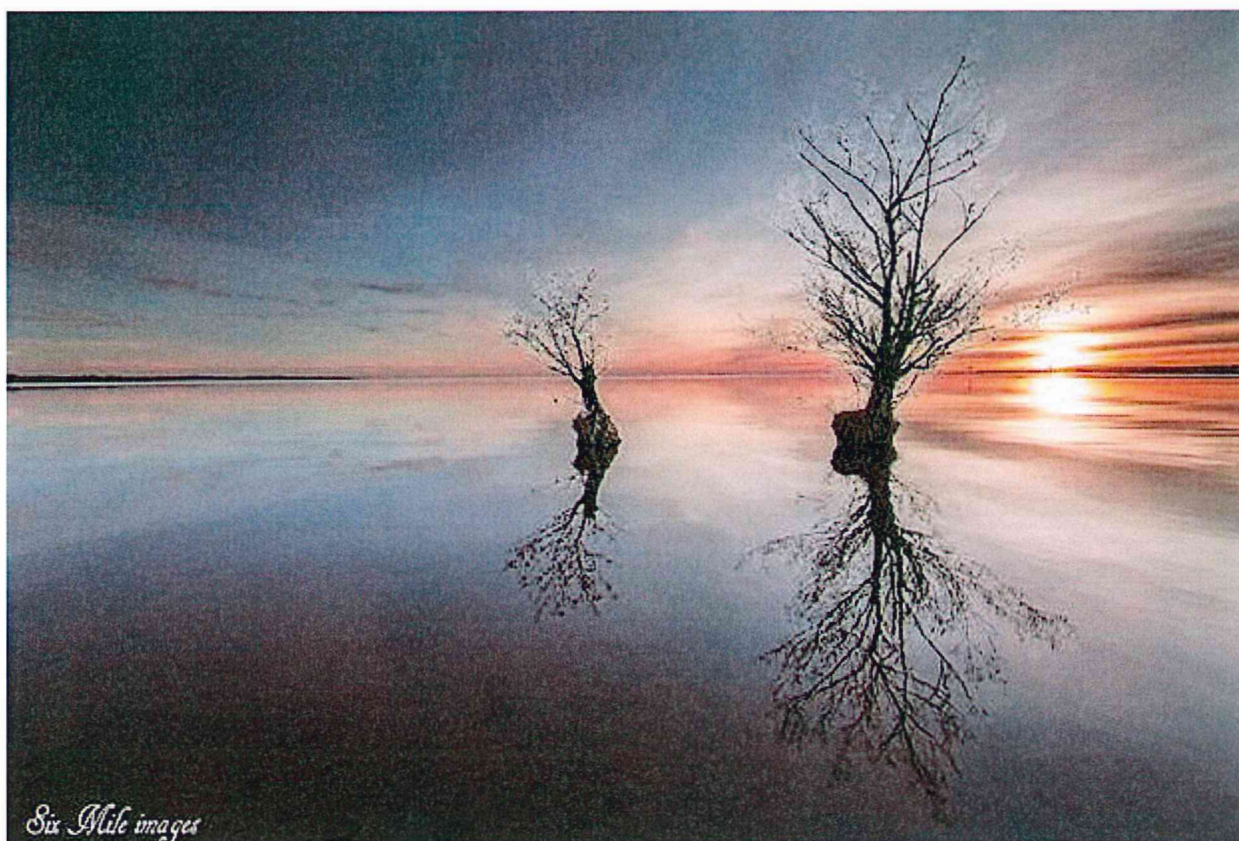


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Representation by Friends of the Earth NI to Mid Ulster District Council's

Local Development Plan – Draft Plan Strategy consultation

18th April 2019

SECTION 1: MINERALS

14.0 MINERALS

Overview

In the Overview of the Minerals section the Council highlights the extent of reliance of Mid-Ulster's local economy on the mineral industry 'with the District being nearly twice as reliant on the construction industry for employment as Northern Ireland as a whole'. Given the fact that the minerals industry is one of the most environmentally damaging industries globally, there is an imperative to find more sustainable alternatives urgently. This necessity is not reflected in the Mid-Ulster draft plan document, instead the plan ties the District into further dependence, and thus, further environmental devastation.

Your Council is required to understand what the precise social and environmental impacts of extraction activities to date are, and the strategic need for proposed future extraction. This essential analysis has not been done, therefore to commit to further extraction without this baseline information is premature and potentially extremely damaging to the environment and the well-being of the population within your District. You also have an obligation to reduce carbon dioxide emissions and extractive industries contribute significantly to climate change.

Soundness test failed:

P3, C2, C3

(soundness test failure further explained later in our document)

Regional Policy Context 14.6

We refer to the following text:

"The SSPS [sic] directs that our Plan should ensure that sufficient local supply of construction aggregate can be made available for the local market, and where appropriate the regional market area and beyond, to meet likely future development needs over the Plan period."

The SPPS cannot 'direct' the Council's Plan. The test for soundness considers whether the Council has 'taken account' of policy and guidance from the Department, however the Plan-led system gives legal precedence to the Local Development Plans of the Councils. Additionally, the assertion that Mid-Ulster Council should sacrifice its environmental integrity to satisfy external markets is extremely flawed. The lack of clarity also, of what 'beyond' means deems this policy statement untenable. Does this mean that Mid-Ulster must continue to extract from its fragile environment to satisfy building projects in other continents?

Soundness test failed: P3, C2, CE2, CE3, CE4

Community Plan 14.8

In response to the assertion that the Council's Minerals Policy helps support in the delivery of the economic aspects of your Community Plan, we would assert that the Minerals Policy directly undermines many of the stated outcomes of the Community Plan, and one of three of its foundational cross-cutting principles, namely: Sustainable Environment.

Mid Ulster's Community Plan has identified 15 outcomes that the Council aims to achieve in Mid Ulster over the life of this plan. Below are some of these outcomes (in italic) and our comments (in plain text) showing how the Council's Draft LDP contradicts these outcomes with its overly permissive policies with regards to the extractive industries:

- *We have more people working in a diverse economy*

The extractive industry is preventing the development of alternative, more sustainable business. The Council's Draft Plan fails to consider in any meaningful way how the District can transition from an unsustainable and environmentally destructive economic model to a more just and sustainable model.

- *We will increasingly value our environment and enhance it for our children*
- *We give our children and young people the best chance in life*

The expansion of the extractive industry blatantly contradicts these sought-after outcomes. Our climate is in chaos due to our industrial activities and we are destroying the life-support systems that our children and the generations to come need to rely upon. There is a wealth of scientific evidence, most notably the IPCC's most recent report, showing how our environment is in peril and how our children will be much worse off in terms of security and a healthy environment if drastic, immediate action is not taken. Your Council's LDP should contain a comprehensive strategy on how to reverse our impact on Climate Change.

- *We are better enabled to live longer healthier and more active lives*

Extractive projects and industrial agriculture directly affect people's health and their right to clean air, water and a healthy environment. The Community Plan and the draft LDP fail to address the importance of healthy ecosystems and access to nature as being vital to wellbeing.

- *We care more for those most vulnerable and in need*

The most vulnerable are those most at risk from an ailing environment, especially our children whose future we are adversely affecting by continuing to rely on the extractive industries.

- *We are a safer community*

Permitting mining and other destructive projects without a clear social licence will only cause conflict and division within and between communities and will erode trust between citizens and government. Living beside a toxic mine or an unlawful quarry also does not equalate to a safe community.

Additionally, one of the three cross-cutting aspects of the Community Plan is 'Sustainable Environment'. The preference given to the extractive industries in the Council's draft plan directly contradicts this pillar of the Community Plan, for reasons already stated.

Soundness Tests failed: P3, C2, CE1, CE2, CE4

POLICY MIN 1 – MINERAL RESERVE POLICY AREAS

We object to the existence of Mineral Reserve Policy Areas for economic purposes. As already stated, the extractive industries have substantial, adverse and irreversible effects on our environment and as such, the LDP of the Council should be focused on transitioning to a sustainable, circular economy. Within such a transition, our towns need to be strategically improved and allowed space to evolve (in part, to avoid further encroachment into our countryside). The Mineral Reserve Policy Areas are extremely close to the towns of Coalisland, Dungannon and Cookstown – thus preventing the sustainable evolution of these towns, not to mention the health worries to the populations of these towns from living so close to industrial quarrying.

What has not been considered in this Policy, but what was mentioned in the Council's Overview, was the safeguarding of areas for mineral conservation. This would be necessary with the presence of hydrocarbons, for example, which should be conserved, and not exploited, if we are to avoid the worst effects of climate breakdown.

The Strategic Environmental Assessment (SEA) is both incorrect and inconsistent regarding Mineral Reserve Policy Areas. In one instance it states that 'None of the approaches [considered] were found to have any significant negative impacts.' Yet then goes on to state 'Both approaches are likely to be negative in terms of all of the environmental indicators because they will both involve a degree of quarrying which will have spin off impacts on traffic, landscape, air quality, water quality and on the landscape.' It then concludes 'However, there will be no major negative effects caused on any of the environmental indicators.' As stated earlier, if baseline evidence on the environmental and social effects of existing and previous extractive projects has not been carried out, then an SEA of the potential environmental and social impacts of future activity cannot be relied upon.

Soundness Tests failed: P3, C2, CE2, CE4

POLICY MIN 2 – EXTRACTION AND PROCESSING OF HARD ROCK AND AGGREGATES

ACMDs

We object to the exceptions to the constraint on extraction in ACMDs. These areas are, as your document states: 'areas of intrinsic landscape amenity, scientific, heritage value', as well as fragile habitats for protected species. A 'minor expansion' is still unacceptably damaging for these important areas and the provision of stone for restoration and maintenance could be sourced outside these areas in need of special protection.

We also argue that the ACMD should be amplified to include the entirety of the Area of Outstanding Natural Beauty which is the Sperrin Mountains.

Elsewhere

We also object to the statement 'Elsewhere, extraction and processing of hard rock and aggregates will conform with the Plan'. To the contrary, we call for a moratorium on new extractive projects until all the following criteria are met:

- (a) A *cumulative* assessment on the impacts of all extractive industries in your Council area is carried out to develop a scientifically accurate *baseline* against which all

future Environmental Impact Assessments for extractive industries can be reliably assessed

- (b) You carry out a *review of extant consents* for extractive industries to comply with the legal requirements under Regulation 45, 46, 50, 51 of The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 to ensure compliance with Article 6 of the Habitats Directive
- (c) An *objective* assessment is carried out of existing *unregulated and unassessed* extractive industries in your Council area to enable you to assess:
 - strategic need for further extraction
 - current volumes of extracted material (please note the annual minerals statement is not up to date and industry claims require independent verification)
 - human rights of communities affected by the industry
 - social impacts
 - economic impacts
 - environmental impacts
- (d) An *independent economic assessment* is carried out to assess the benefits and disbenefits of extractive industries that addresses at all issues including:
 - bonds for councils
 - restoration planning
 - clean-up costs
 - contribution to local economy
 - economic damage to other industries
 - impacts on road infrastructure, public health, impacts of unlawful extraction on lawful businesses, etc
 - benefits and disbenefits of existing extraction
- (e) Art 18 of the Quarries Order (NI) 1983 requires a return to be made each year by quarries. Until this is carried out and the figures assessed by your Council it is premature to approve any new quarries without objectively validating current extraction and strategic need
- (f) ROMPS – The Review of Old Mineral Permission is carried out either by the Department for Infrastructure or a similar exercise independently by your Council (Planning Act (NI) 2011 Schedule 2 and Schedule 3)
- (g) An assessment of human rights impacts of existing and proposed extraction addressing
 - Access to information, participation and access to justice/redress
 - Right to life
 - Right to pursue land-based livelihoods
 - Right to food, water, housing
 - Right to health
 - Children’s rights
 - Cultural rights

We also insist that the Council should adopt a policy against the granting of retrospective permissions to extractive activities. Unauthorised EIA development can never be approved retrospectively.

14.17: Regarding the Council’s assertion that the shores of Lough Neagh are protected from extraction, we argue that they are not protected from the extractive industry – due to the presence

of processing plants and all the transport and infrastructure attached to this, thus we assert that more regulation is needed to protect this Special Countryside Area.

We object to the Council's omission of Lough Neagh itself from the SCA as we believe the extraction of sand to be unlawful and therefore should be halted until proved otherwise.

14.18: As stated above, we object to the 'presumption in favour of hard rock and aggregates extraction and processing'. It is premature for your Council to develop a robust, defensible and comprehensive minerals policy until the issues listed above are resolved, legal obligations fulfilled, baselines established, and orderly planning is carried out.

POLICY MIN 3 – VALUABLE MINERALS AND HYDROCARBONS

We object to the policy statement: 'The exploration and extraction of valuable minerals including hydrocarbons and metalliferous minerals will accord with the Plan providing that there are no significant environmental impacts or significant risks to human health.'

The use of the word 'significant' regarding environmental impacts and risks to human health is subjective, open to a huge range of interpretations, and thus renders the policy statement invalid; significant by whose determination – the public or the mining industry? This policy statement should be replaced by a presumption against the exploration and extraction of hydrocarbons and valuable minerals, including metalliferous minerals, because of the environmentally damaging methods of extraction that are not acceptable. The policy regarding 'unconventional' hydrocarbons should be extended to include all hydrocarbons, due to their contribution to climate change.

14.19 In reference to the statement: 'There may be situations where minerals are discovered which are particularly valuable and the exploitation of these would bring about economic benefits', we question this conclusion that the exploitation of valuable minerals brings about economic benefits and ask the Council for its robust evidence for this. Given the cost of the environmental damage sustained, the cost of adopting to climate change -brought about, in part, by excessive extraction, the social costs of ill-health and community conflict, and the fact that the majority of profits from valuable mineral extraction leaves the country with the multi-national corporation, the economic benefits to the population of Mid-Ulster are negative.

14.20: Regarding the statement: 'Where such high value metalliferous minerals are found, there will not be a presumption against their exploitation in any area' – we strenuously object and instead insist that there *should be* a policy presumption *against* the exploration and extraction of metalliferous minerals given their destructive impacts on communities, landscapes and ecosystems.

To support our objection we list the following reasons:

Reason 1: There is sufficient gold in circulation to meet the world's current industrial needs and there are alternatives such as urban mining (mining existing waste) to recover gold and other valuable minerals.

Reason 2: The policy presumption in favour of mineral exploitation "*in any area*" that may be "*particularly valuable to the economy*" as contained in 6.157 in the Strategic Planning Policy Statement, and which the Council echos in 14.20, is exceptionally permissive and needs to be challenged by more sustainable policies in your Local Development Plan. This

policy in 6.127 effectively gives policy supremacy for mining above *all other* land uses, such as farming, residential use, nature conservation and tourism.

Reason 3: The economic evidence from around the world demonstrates that these industries extract wealth from local economies, can adversely affect jobs in tourism and agriculture and leave long term problems with often irreparable damage that has a negative impact economically.

Reason 4: With the introduction of the plan-led system your Council is not *obliged* to follow the permissive policy and have a duty to pursue your own policies in your development plans.

Reason 5: Given the criteria identified in the section above a precautionary approach is needed to enable the regulatory and legal context 'catch up' so a robust planning framework can be established. To do otherwise and accept a permissive policy is premature.

Soundness tests failed: CE1, CE2, CE3, CE4

The protection of the environment and human rights should be core minimum policies for the regulation of this sector through the planning regime. Learning from international best practice, we believe your polices should:

- a) Develop an overarching resource vision that transforms wealth into inclusive sustainable development. Whether to extract or to leave resources in the ground requires questioning of the environmental, social and human rights costs and benefits for the country and future generations
- b) Ensure a new mineral resource ownership strategy with the Department for the Economy and the Crown Estates is established and how these mineral rights align with other surface rights to land
- c) Strengthen coherence and coordination with other regulatory bodies such as GSNI, Public Health Agency, NIEA and transboundary agencies from the Republic of Ireland
- d) Improve enforcement by your Council for existing extractive industries especially existing unauthorised activities which are significant
- e) Access to information, public participation and access to justice as required by the Aarhus Convention is a foundation to be established before new consents are issued. This will provide transparency and ensure an informed public can participate in decision making and provide mechanisms to hold decision makers to account
- f) A comprehensive strategy on restoration, financial bonds, and aftercare needs to be established
- g) To give certainty and security to other land uses and the human rights of others, the Council must address what are the acceptable distances of different types of extractive industries in relation to housing, farming, other land uses, schools and communities

h) You will be aware of the UK commitment to the UN Sustainable Development Goals. I refer you to *Extracting Good Practices* from the United Nations Development programme. International best practice should evidently inform the Council's Mineral Policies.

14.21: Regarding the statement: 'Exploration for such high value metalliferous minerals can usually be carried out under the current permitted development rights however, where planning permission is required, full consideration will be given to the potential environmental impacts and any risks posed to safety or human health', we call into question this assumption that permitted development rights are applicable for exploration of high value metalliferous minerals, and as such escapes assessment of the potential environmental and human health impacts.

In anticipation of the outcome of the Department for Infrastructure's consultation on the issue of permitted development, we feel it is necessary to draw the Council's attention to concerns which have not been taken into account when considering Permitted Development Applications in respect of applications that fall under parts 16 and 17 of The Planning (General Permitted Development) Order (Northern Ireland) 2015 (GPD0).

Where any development is identified in either of the Schedules to the Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 and an Environmental Impact Assessment is applicable, Permitted Development rights do not apply (see Article 3(8)(b)(i) of the GPD0).

This provision states that permitted development is not granted in respect of developments of a description mentioned in column 1 of the table in Schedule 2 to the EIA Regulations where any part of the development is to be carried out in a 'sensitive' area.

'Underground mining', 'deep drilling' and 'surface industrial installations' are all mentioned as activities within column 1 of the table in Schedule 2 to the EIA Regulations. Moreover, the Sperrins is classed as a 'sensitive' area within the meaning of the legislation due to the fact that it is both an Area of Outstanding Natural Beauty and in the proximity to an SAC within the meaning of regulation 9 of the Conservation (Natural Habitats) etc Regulations (Northern Ireland) 1995.

Accordingly, Permitted Development rights should not be granted in respect of such activities within the Sperrin Mountains without an EIA screening and a screening under article 6.3 of the Habitats Directive. It is clear that the cumulative impacts of exploration of metalliferous minerals require both a full Habitats Regulations assessment and an EIA.

Furthermore, the basic aim of permitted development is to exclude relatively minor and non-contentious development proposals from the requirement to obtain planning permission and to allow the planning department to concentrate on more contentious applications that may have greater impacts on amenity and the environment. In a comprehensive report to the Department regarding General Development Order in 2003, Nathaniel Litchfield and partners wrote, "permitted development should only be given to development which is marginal and incidental to existing uses of land". It is indisputable that exploratory mineral mining is not marginal nor incidental.

POLICY MIN 4 – PEAT EXTRACTION

We support the policy presumption against commercial peat extraction. We believe, however, that the exceptions to commercial peat extraction, especially 'where the peat land is not reasonably capable of restoration', will invite planned despoliation of fragile bogs. A more comprehensive policy, to ensure that this is not the case, is required. As the Council rightly points out, our bogs are

our most important carbon stores that we have, given our severe lack of woodlands, and thus must be afforded the highest protection possible. To this end, a more stringent policy on enforcement of infringements needs to be developed.

POLICY MIN 5 – RESTORATION OF MINERAL SITES

We refer to the following statement: 'All applications for mineral development must include, where appropriate, satisfactory and sustainable restoration proposals'; clarification is needed on the stipulation 'where appropriate'; for this policy to be effective the Council would need to specify when it is appropriate and when it is not.

We would direct Mid-Ulster District Council to Fermanagh and Omagh District Council's draft LDP, Draft Policy MIN02, which we would commend:

"All applications for mineral development must be accompanied by satisfactory proposals for: the final restoration scheme and proposed future land use; •timescales for completion of restoration including details of completion of individual phases of restoration where a progressive scheme is proposed; •aftercare arrangements once restoration is complete; and site management arrangements including security during and after the process of restoration."

Additionally, as part of any mineral development, a restoration and aftercare bond or other financial provision should be required to ensure full restoration and reinstatement of the site.

14.31 – the policy justification points to 'successful progressive restoration proposals which have witnessed sites being used for a completely different purpose post exploitation than was the case pre exploitation'. Whilst we do not object to progressive restoration proposals, we would object if the commercial benefits of restoration proposals were to be taken as a material consideration for the granting of extractive projects.

POLICY MIN6 – MINES, SHAFTS AND ADITS

To be added to this policy, we wish to see a statement clarifying that disused mines, shafts and adits should not be used for the disposal of toxic or hazardous waste - for example, radioactive waste.

Failures of Soundness tests further explained

Procedural tests

P3 Has the DPD been subject to sustainability appraisal including Strategic Environmental Assessment?

The SEA is inadequate and reaches incorrect conclusions. As well as our reasons stated under POLICY MIN 1, it fails to take into account key information, evidence and legislation concerning environmental protection. When alternatives are presented there is insufficient analysis of what they mean or insufficient breadth in their scope that takes into account sustainable development, climate change and the principles and policies that underpin the Regional Development Strategy.

Alternatives are constrained by a 'development at any cost' ethic. There is in addition insufficient consideration of transboundary impacts of pollutants to the Republic of Ireland. For example, there is no analysis of the nitrates, ammonia and phosphates crises on protected sites or the significant deterioration in recent years of water quality. The duty to restore protected European sites to favourable conservation status is not addressed in breach of the Habitats Directive and the duty to adopt a precautionary approach is ignored. Climate change and the need for mitigation and adaptation is not addressed in any meaningful or coherent way.

Consistency tests

C2 Did the council take account of its Community Plan?

Please see our comments under the Community Plan 14.8 section above.

C3 Did the council take account of policy and guidance issued by the Department?

The Northern Ireland Executive's, '**Everyone's Involved - Sustainable Development Strategy,**' (May 2010) aims to 'improve our society and communities and utilise our natural resources in an environmentally sustainable manner'. The Sustainable Development Strategy's intention is 'to address global issues such as climate change' and has 'living within environmental limits' as one of its guiding principles. As stated in many parts of our representation, the Mid Ulster District Council's draft LDP fails to align to this national strategy. See our section on Climate Change for further evidence of this.

C4 Has the plan had regard to other relevant plans, policies and strategies relating to the council's district or to any adjoining council's district?

The document fails to address the impacts of mining and quarrying and intensive agriculture for neighbouring Council areas or the impact of those sites (existing and proposed) that are located in neighbouring Council on your Council area. There is no consideration given as to how SEAs for these adjacent council areas will strategically align together.

Watersheds are shared between Northern Ireland and the Republic of Ireland and the cumulative impact of potential impacts from extractive industries and industrialised factory farms are not understood with the degree of scientific certainty needed to inform a robust planning process. In this regard ammonia, nitrates and ammonia pollution from your Council area (from intensive agriculture) is likely to be adversely affecting the Republic of Ireland but nowhere are these land, air and water trans-frontier impacts assessed. This is in breach of the SEA Directive, ESPOO Convention and Gothenburg protocol. In this regard the Habitats Regulation is fatally flawed.

Coherence and effectiveness tests

CE1 The DPD sets out a coherent strategy from which its policies and allocations logically flow and where cross boundary issues are relevant it is not in conflict with the DPDs of neighbouring councils;

Throughout our representation we have identified where the policies within your DPD are not coherent, nor do they logically flow. Please see all points above for the particular details.

CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base;

There is a lack of evidence to underpin the Council's policies on Minerals. Particularly, as previously stated, there is no baseline data on previous and existing extractive activities in order to meaningfully undertake a Strategic Environmental Assessment on the potential environmental consequences of further extraction. There is also a lack of evidence to back up the economic arguments in favour of continued reliance on extractive industries.

CE3 There are clear mechanisms for implementation and monitoring;

Given the failure to monitor current extractive activities and the failure to implement enforcements for breaches, there can be no confidence that further extraction can be adequately monitored, nor restrictions implemented.

CE4 It is reasonably flexible to enable it to deal with changing circumstances.

The certainty that the breakdown of our climate will bring drastically changing circumstances is globally accepted by the vast majority of the scientific community. This is not, however, reflected in any way in the Council's draft Plan. We refer you again to our section on Climate Change.

SECTION 2: CLIMATE CHANGE

We are facing climate breakdown. It represents nothing less than an existential threat to civilisation. We have seen a temperature increase of around 1°C above pre-industrial levels, and the impacts are already becoming evident. In recent years we've seen 50°C heat waves in India and Pakistan, severe flooding in Bangladesh, and droughts in Africa, the Middle-east, and devastating forest fires in the US.

These impacts will only get worse as temperatures continue to rise. If we don't reduce our greenhouse gas emissions rapidly, global temperatures are likely to increase by 2° – 3°C by the middle of the century, and reach 5°C by 2100. That may not seem like much, but it is in the range associated with mass extinctions.

The UK and Ireland, along with most of the world's nations, have agreed to the targets of the Paris Climate Accord – to keep the global temperature rise to well below 2°C, and to take action to limit it to 1.5°C.

In order to have a good chance of staying below a 2°C temperature rise, the planet as a whole is limited to around 800 billion tonnes of CO₂ (GtCO₂). If we are to stay below 1.5°C, the preferred target in the Paris Agreement, we cannot emit more than about 400GtCO₂. If we were to burn all of the known reserves of fossil fuels, it would produce around 2,600GtCO₂. In other words, almost all of the known reserves of fossil fuels must remain in the ground, and energy efficiency and sustainable development must become central to all decisions, services, and developments.

Mid Ulster Council must do its fair share in limiting the global temperature rise. That requires a dramatic transformation of how we live, work, shop, socialise, travel, eat, and heat our homes. Tinkering around the edges will not be enough.

The Community Plan

The Mid Ulster Community Plan includes 5 themes, and 3 cross-cutting principles. All of these themes and principles are relevant to action on climate change. Action is required in all areas for a speedy, effective, and just transition to low-carbon future.

Themes

Embedding the climate change imperative into the 5 themes is essential if Mid Ulster Council is to take meaningful action on climate breakdown:

Vibrant and safe communities: vibrant and safe communities are ones where children can play in the streets, where wheelchair users and parents pushing prams can walk on footpaths without having to negotiate around parked cars, and where town centres are bustling civic hubs. Patterns of development in recent decades run counter to these though. Private cars dominate streets and housing estates, out-of-town developments are inaccessible for those without cars, exacerbating transport and food poverty. Those who can't afford to move become trapped in a downward spiral of multiple deprivation.

The Council can help to create vibrant and safe communities by using the planning system to ensure residential areas are not dominated by the private car, blocking the development of out-of-town shopping centres to ensure town and local centres become the focus of shopping, services, and socialising, and creating communities that are safe for walking and cycling. Such measures not only make local centres and residential areas more appealing, they also contribute to greenhouse gas reductions.

Economic growth: infinite economic growth on a finite planet, with finite resources, is an impossibility. The Council should seek developments that maximise other economic benefits such as secure, meaningful, and fairly paid jobs, community benefits, and environmental protection. In other words, the Council should stipulate that only proposals that satisfy a strict definition of sustainable development should get approval. Sustainable development is not a balancing exercise. A balancing exercise would allow one of the 3 primary elements, environmental, social, and economic, to override the other 2, if it was sufficiently beneficial. Rather, it should be a synergistic exercise, where only developments that maximise benefits across all three elements should be considered.

Infrastructure: low-carbon infrastructure is essential for the shift to a climate friendly society. The Council should use its planning powers to enable the development of public transport, and walking and cycling provision, and encourage people to install renewable energy. Green infrastructure such as woodlands, parks, tow-paths, and open spaces help to cool urban places, absorb rain and flood waters, clean the air, provide sound barriers, and act as carbon sinks.

Education and skills: industrialised societies such as Northern Ireland have become deskilled, and people have developed high levels of specialisation. A climate resilient society must rediscover the skills that were once commonplace. For example, cooking meals from scratch using fresh produce has given way to the convenience of putting a ready-meal in a microwave oven. Skills that will be sought after in a carbon constrained world include mending and maintaining clothes, machinery, households, and vehicles, growing and cooking food, fitting and maintaining energy efficiency measures, designing, building, and fitting renewable energy technologies, horticulture for the creation and maintenance of green spaces, and community development for community run transport services, food services, crèche services, and care services. The Council has a role in facilitating and promoting the development of these essential skills, using the planning system to provide the necessary infrastructure.

Health and well-being: action on climate change will bring benefits to people's health and well-being. Planning settlements to make walking and cycling easier have obvious health benefits. Reduced traffic volumes, and fossil free energy will also improve air quality, reducing respiratory

problems and premature deaths, cut incidents of deaths and injuries from road traffic accidents. More than 500 premature deaths in Northern Ireland are attributed to poor air quality.

Homes that are more energy efficient are warmer in winter, suffer from less damp, and are healthier places to live. Improving energy efficiency could help to tackle fuel poverty, and reduce the number of winter deaths.

Access to green spaces has been demonstrated to improve people's well-being. It enables people to reconnect with nature, and offers a respite from their stressful lives. Something as simple as being able to see trees from an office or home has demonstrable benefits.

Principles

Equality: fuel poverty, transport poverty, and food poverty are serious problems faced by many people. Building low-carbon, climate resilient communities will help to alleviate these problems.

Sustainable Environment: it is imperative that the Council plays its part in tackling climate breakdown. The science is clear. We are rapidly running out of time. The Council has a responsibility to act, not just for current generations, but for future generations too.

Public Services: the Council has a role in either directly providing public services, or facilitating their development, that will enable the transition to a low-carbon, climate safe society. Community transport, co-operative energy schemes, communal gardens and shared cooking projects, for example, all require support and infrastructure.

Conclusion

Climate breakdown is probably the greatest threat facing humanity. The Council must play its part in reducing greenhouse gas emissions, and creating safe, resilient, low-carbon societies. The planning system is an essential part of the solution. The Council must use its planning powers to build the types of communities that will be able to withstand the climate change we are already locked into, and avoid the worst scenarios. Future generations depend on ambitious action now.