Funso Doherty
Lagos Nigeria
email: fd@funsodoherty.org

Friday, July 7, 2023

The Hon Commissioner
Ministry of Physical Planning & Urban Development
Block 15, Secretariat, Alausa
Ikeja, Lagos State

Dear Sir,

RE: LAGOS ISLAND MODEL CITY PLAN – COMMENTS ON DRAFT FINAL REPORT

Please find below, for your attention, consideration and necessary action, comments on the draft final report of the Lagos Island Model City Plan, which was exposed for public comments last month.

Background

Dar Al-Handasah, (DAR), an international consulting firm headquartered in Lebanon, was engaged by LASG to carry out this engagement. According to the report, stakeholder input was received primarily from LSDPC, The Oba of Lagos, Local Government Councils, Ministry of Tourism, Arts and Culture and Lagos State Urban Renewal Agency. With a vision of "Regeneration and Evolution of Lagos Island's Vital Environment" (RELIVE), the draft final report sets out a Framework, High-Level Strategies, Goals and Priorities. In this regard, it defines the following order of priorities:

1. To protect, mainly from flooding
2. To restore the informal settlements
3. To enable the Island Recover and Thrive

For now, it is proposed that implementation of the plan will start with a focus on the first priority, which is to protect the Island from flooding. It proposes to do this primarily by:

- Upgrading three existing drainage canals at strategic locations on Lagos Island.
- Re-developing the areas along the sides of these three canal sections being upgraded, including the removal of existing structures on the proposed development sites (Shown as Zones A, B & C on attached Map)
- Expanding and developing the waterfront all along the full length of the Marina from Five Cowrie Creek by Victoria Island all the way round to the Ebute-Ero area, by reclaiming land and extending the shoreline further out into the Lagoon (Shown as Waterfront on attached Map)

It is claimed that this approach will have the added advantage of converting an existential risk into a development and renewal opportunity.

Comments & Input

1. We hope and expect that DAR was selected through an appropriate and competitive selection process. We understand that they did a substantial part of the work on the Eko Atlantic project. However, we believe it would be beneficial to have local partners

as part of the design team that will combine technical knowledge with an understanding of the context, historical significance and cultural sensibilities of Lagos Island and its community.

2. The stakeholder consultation undertaken in developing the plan appears to have predominantly emphasized input from organs of government which could create a risk of dominant influence of one set of perspectives. There is need for a broader consultation to include community stakeholder groups like youths, indigenous families, property owners, residents, the business community, real estate developers, the finance and investor community, media etc. This should influence the visioning and design thinking, informing initial development of the plan, which will be more valuable than seeking reactions to a "draft final report".
3. This plan involves extensive reclamation of land from the Lagoon. It is important to understand the environmental impact of this and other development activities within and around the lagoon, including the multiple other on-going land reclamation projects near Lagos Island that, as many have suggested, may be affecting waterway conditions, natural drainage patterns and channels, and exacerbating flooding and other problems. The lagoon is an important part of our natural draining wetlands and flood control mechanisms. It is critical that all such development activity be in line with a sound, long-range strategic climate action plan for Lagos State that is comprehensive, science-based and cognizant of lives and livelihoods of coastal communities.
4. This plan runs the risk of being counter-productive because it links urgent flood protection imperatives, to adhoc development proposals that seem, to a large extent, influenced by financing constraints, which may be real or perceived. While urgent environmental protection activity must be pursued expeditiously, the development aspects of the plan should be rooted in well-considered plans that stakeholders can be confident are squarely aimed at regenerating the Island's community and existing built environment and addressing formal and informal settlements, including infrastructure and large-scale affordable housing, above other interests.
5. The Plan's premise that there is a lack of public sector funding for protection initiatives is also not accurate. All over the state, LASG is undertaking drainage and flood protection works without tying such to sale or development of prime land or waterfront in any particular locality. Indeed, the largest share (approximately N29bn) out of the N100 billion of funding recently successfully raised by LASG from the financial markets was indicated as being for the Office of Drainage and Water Resources to be used for drainage and flood control projects across the State. It is not clear why Lagos Island is being characterized and treated differently.
6. Accordingly, further explanation will be needed for many stakeholders to understand and accept a plan that as a first step, requires commitment of the entire waterfront from Five Cowrie Creek through Marina to Ebute-Ero, to private sector development extending out into the Lagoon, in seeking to achieve protection from flooding. This is in addition to the other proposed canal works that involve removal of existing buildings. The issue of financing should be considered distinct from the urban renewal design. Let us first understand what Lagos Island needs and then apply our minds to funding. Indeed, different

alternative urban renewal design options can be solicited and assessed, together with corresponding approaches to financing and implementation.

7. In my opinion, more attention also needs to be paid to the issue of heritage sites. The historical significance of Lagos Island in the context of Lagos State, of Nigeria and its pre-colonial, colonial and post-colonial history as a people and Nation, is embedded and lives in many of the sites and buildings on Lagos Island. The identification, preservation and celebration of these must be foundational and a central feature of any renewal plan for Lagos Island and should not come across as an adjunct or afterthought.

8. Related to this, the large population for whom Lagos Island is the only local community they have must be specially recognized. It is their home town within their state of origin. They and their families live there and have done so for many generations - in some cases, centuries. When the office workers and traders who come in from elsewhere leave in the evenings and weekends, they remain. They must be given due recognition and their voices must be solicited and heard prominently in this process

9. The need for effective and inclusive Governance and oversight of a project as significant as this should also not be understated. LASG should consider the establishment of a Lagos Island Renewal Trust to function in a steering capacity. This body will be appropriately constituted to reflect stakeholder interests and will help ensure:
    a) Secure and balanced public interests, on-going transparency, inclusiveness and communication.
    b) adherence to a timeframe and phased roadmap with specific milestones, goals and targets for each phase and for the overall plan period

10. Finally, in future, for wider awareness, LASG should make copies of such exposure draft documents available online and consider holding town hall sessions at community level.

Yours Faithfully,

Funso Doherty.

Cc: Rt. Hon Mudashiru Obasa, Speaker, Lagos State House of Assembly

