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RSES Material Amendment Submissions
Southern Regional Assembly
Assembly House
O'Connell Street
Waterford
X91 F8PC

9th October 2019

Our Ref: SCP171204.3

Re. Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy 2019–2031 for the Southern Region

Dear Sir / Madam,

We acknowledge your notice, dated 10th September 2019, in relation to the proposed Material Amendments (the 'Amendments') to the Draft Regional Spatial and Economic Strategy 2019–2031 for the Southern Region (the 'RSES').

The EPA is one of five statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the RSES and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as a SEA environmental authority do not include approving or enforcing SEAs or plans.

We note the environmental assessment findings and additional recommendations proposed for the Amendments as set out in the Environmental Assessment Report, Appropriate Assessment and Flood Risk Assessment. The assessment findings and associated SEA recommendations should be taken into account prior to finalising the RSES. Where any SEA recommendations are not integrated, the SEA Statement should provide the reasoning for this and the RSES should also clarify the necessary mitigation / enhancement measures required to minimise potential for likely significant effects and ensure alignment with plan objectives and higher-level plan commitments. Specific additional comments are provided below to also consider prior to finalising the RSES.

Specific Comments to be considered

Biodiversity

In the context of protecting biodiversity, at a regional level, we suggest that a regional biodiversity action plan be developed. This would help ensure biodiversity protection / conservation is supported regionally and assist protection of biodiversity at a county and local level. Recently, the NPWS published its latest *Article 17 Report on the Status of EU Protected Habitats and Species in Ireland* www.npws.ie/publications/article-17-reports. Globally, nature is under threat from many different pressures such as population increase, development and land use conflicts, as reported in the *Global Assessment Report on Biodiversity and Ecosystem Services* (IPBES, 2019) www.ipbes.net/global-assessment-report-biodiversity-ecosystem-services. Through the preparation and implementation of a regional-level biodiversity action plan, the RSES could contribute to halting and reversing this decline in the context of the region.

In relation to the support for various tourism and amenity related proposals, we recommend that opportunities to protect, maintain and enhance ecological corridors should also be considered as part of such initiatives. Commitments to support the All-Ireland Pollinator Plan and the National Biodiversity Action Plan could also be incorporated. Avoiding the spread of water-borne invasive species and diseases, such as the crayfish plague, should be key considerations when proposing water-related tourism developments.

Climate Action

We welcome in section 2.2.1 the proposed additional text in relation to climate change and Ireland's Climate Action Plan 2019. The text supporting the implementation of the Climate Action Plan 2019, could also be incorporated into a specific regional policy objective.

Tourism

We note the proposed amended objectives and new objectives relating to tourism. In supporting future tourism-related developments, an important aspect to consider is the capacity for the environment to absorb additional development. The need to protect designated sites, protected species and supporting ecological linkages should be a key consideration.

These tourism initiatives, at a plan level, should also consider the requirements of the SEA and Habitats, Water Framework, EIA and Floods directives, as appropriate and relevant. The potential for cumulative effects arising from multiple initiatives should also be taken into account.

Transport

We welcome the SEA findings and the additional recommendations proposed, in relation to ensuring the relevant environmental assessments are carried out. Compliance with the relevant EU environmental directives and associated national legislation, and alignment with the National Planning Framework should also be ensured. You should also consider including a reference to the forthcoming Planning Land Use and Transport Outlook 2040 (PLUTO). We also recommend that a high level of integration and coordination between land use and transportation planning is promoted within the RSES.

One-off housing considerations

The CSO reported that in 2016, 26% of all occupied dwellings in the State were one-off houses. For 17 counties, one-off housing comprised over half of all dwellings built since 2011.

Extensive one-off housing has many potential negative environmental implications. These impacts include increased Greenhouse Gas emissions (due to need for longer distance private vehicle commuting), fragmentation of ecological linkages and habitats, increased disturbance of habitats and species, and loss of agricultural lands. The RSES should emphasise the importance of working towards greater levels of sustainability for those living in one-off houses. This could be achieved through, for example, encouraging micro-generation of renewable electricity through solar, wind and heat pumps. Additionally, one-off housing needs to be supported from the outset by effective operation and maintenance of on-site domestic wastewater treatment systems and private wells, to minimise environmental and health impacts.

The National Planning Framework recognises that our planning system needs to place a stronger emphasis on restricting rural one-off housing in favour of directing growth into existing settlements in a sustainable, planned and integrated manner. Dispersed rural populations and urban sprawl result in higher infrastructure costs for transport, water, electricity and other services. Additionally, loss of fertile agricultural lands decreases the role played by land and soil in supporting a green and low-carbon economy. To facilitate new rural housing within small towns and villages, the National Planning Framework includes an objective (NPO 18b), involving provision of serviced sites by local authorities. This should also be supported in the RSES, in an environmentally sustainable manner.

Port related considerations

Further development and expansion of the ports within the region should be conditional on ensuring that environmentally sustainable development and compliance with the relevant EU environmental directive requirements, including the Habitats Directive, are placed at the heart of decision making and planning process.

We also suggest that the Regional Assembly consider supporting a recommendation to prepare an integrated framework plans for the Cork Harbour and Waterford Harbour areas, like that carried out for the Shannon Estuary (Shannon Integrated Framework Plan). This would help ensure that the various plan-making authorities within those areas, take a coordinated and integrated approach to land use planning and development, while still affording those areas significant environmental protection.

In relation to MA 72 – RPO 155 – Sustainable Mobility, we welcome the intention to support the sustainable development of water transportation services for Cork Harbour, the Shannon Estuary and Waterford Harbour, aspects such as this could be considered within the context of an overall integrated framework plan for each respective areas.



Water Quality

We also recommend including a reference to the upcoming new guidance for Planning Authorities on River Basin Management Plan Objectives currently being prepared by DHPLG.

Flood Risk Management

With regards amendments related to flood risk management, we recommend that nature-based and natural water retention measures should also be considered as solutions for stormwater management, flood protection and flood alleviation works where possible. The European Commission has published relevant guidance to consider:

https://ec.europa.eu/environment/water/flood_risk/pdf/Note%20-%20Better%20environmental%20options.pdf.

Assessment of Amendments to the MASPs

The SEA assessment findings and associated recommendations for the relevant material amendments should be taken into account prior to finalising the alterations as proposed, or an explanation as to why there were not should be provided in the SEA Statement. Where proposals for additional infrastructure or further development are considered, these should be subject to the relevant environmental assessments to inform site/route selection.

With note the support for upgrading water supply and sewage treatment to meet the growth targets set in the RSES. We recommend that development is infrastructure-led, in terms of aligning future growth and development to areas which can accommodate this additional growth. Irish Water's Capital Investment Plan and National Water Resources Plan (in prep.) should be taken into account in this regard.

Amendment 114 Cork MASP Policy Objective 14 (Cork Airport)

The Noise Action Plan for Cork County should be taken into account in relation to the noise related aspects. There is merit in reviewing and updating the existing Cork Airport Special Local Area Plan, to ensure it aligns with higher level plans and programmes, including the RSES and NPF and integrate the updated noise action plan.

Assessment of Limerick Shannon MASP Policy Objective 6 (Sustainable Transportation)

We welcome the updated wording related to the Limerick-Shannon Metropolitan Area Transport Strategy and for the Waterford Metropolitan Area Transport Strategy Policy Objective 6 (Amendment No. 137). Given the sensitivity of the Region, including for example the Shannon Estuary, Cork Harbour and the River Suir/Waterford Estuary, the potential for cumulative environmental effects that may arise from multiple developments should be a key consideration.

Section 2.1 Assessment of Amendments to RPOs

MA 4 – we support the SEA recommendation to remove the 'early delivery' text of the M24 from the RPO. The deliver of the M24 should be aligned with the relevant planning process and subject to the relevant environmental assessment processes and associated recommendations arising from these assessments.



MA 8 – With regards point “a) Local Authorities should target growth of 30% for each key town..” You should clarify whether this reflects a minimum or maximum growth target.

MA 11 RPO 14 Ennis – while we note the intention to support the Ennis 2040 plan, given the hierarchy of plans and programmes, we recommend that this plan be reviewed to ensure it aligns with the National Planning Framework and the RSES (upon its adoption).

MA 13 RPO 16: Thurles: (b) We note the intention to support the role of Thurles as a centre for international and national standard sporting facilities. Further clarification should be given in terms of what type of facilities are proposed and how they have been considered in the SEA. This should also be aligned with national and regional land use and transport planning policy.

MA 16 RPO 19: Carlow. We note the support to develop under utilised lands along the Barrow. Given the environmental sensitivity of the River Barrow, development of these lands should be carefully carried out and be subject to the relevant environmental assessments, in particular Appropriate Assessment. It is worth noting that the River Barrow is currently impacted with a crayfish plague, which should also be considered in any proposed developments to avoid spreading it to other areas. Development should be zoned appropriate to the level of flooding identified and appropriate setback and buffer zones need also be considered to avoid impacting designated habitats and protected species. Compliance with Water Framework Directive River Basin Management Plan water quality objectives should also be key considerations.

MA 21 RPO 25 Rural – We support the SEA recommendation to remove the reference to “local” need from the objective.

MA 23 RPO C – we support the SEA recommendation that construction and operational impacts arising from infrastructure development proposed be subject to robust environmental assessment. Additionally, we recommend including a commitment that construction and environmental management plans be required, as appropriate to ensure any necessary mitigation measures are established and implemented.

MA 30 – RPO D – See our comments on RPO C above to be considered here also.

MA 40 – RPO F – We welcome the commitment to develop a regional decarbonisation plan, however we recommend that the text be amended to include ‘*within the lifetime of the Strategy*’ or include a timeframe for its preparation.

MA 45 – RPO100 Energy Storage and Carbon Capture, we note the support for initiatives for energy storage and carbon capture. With regards sustainable forestry, initiatives for native tree planting should be supported where possible/ This would also help support and protect biodiversity in addition to advancing the climate mitigation related aims.

MA 58 – RPO I – With regards the ‘Low Carbon International Connectivity’, further information should be provided clarifying what this is, and how it supports national policy commitments on climate change.

MA 60 – RPO 136 Regional Freight Strategy – we acknowledge the intention to support the development of a regional freight strategy. You should take into account the requirements of the SEA and Habitats Directive in this regard also. The proposed strategy should also take into account and align with national transport and climate change policy.

MA 61 – RPO 137 Ports – It may be useful to include a reference to the National Marine Planning Framework. We welcome the intention in MA 62 (RPO 140) to support the development of a Ports and Harbour Strategy for the region. It should be ensured that development and expansion of ports is aligned with national ports policy. The requirements of the SEA and Habitats Directives should also be considered, as appropriate.

Section 2.2 Assessment of Amendments to the Plan

We welcome the use of the EPA-funded Environmental Sensitivity Mapping tool. This should provide a useful in identifying and protecting environmentally sensitive areas within the region (and adjacent to the region), while continuing the develop the region in accordance with the aims of the National Planning Framework. The ESM webtool is now publicly available at www.enviromap.ie. We recommend that the RSES encourage or promote that Local Authorities, while developing and assessing their own plans and programmes, utilise the ESM WebTool to help in their decision making.

Future Modifications to the RSES

Where further changes to the Draft RSES are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. They should be subject to the same method of assessment applied in the “environmental assessment” of the Draft RSES / Amendments.

SEA Statement – “Information on the Decision”

Once the RSES is adopted, you should prepare an SEA Statement that summarises the following:

- How environmental considerations have been integrated into the RSES;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the RSES;
- The reasons for choosing the RSES adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the RSES.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Environmental Authorities

Under the SEA Regulations, you should also consult with:

- The Minister for Housing, Planning and Local Government
- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears that the plan or programme, or

modification of the plan or programme, might have significant effects on fisheries or the marine environment

- where it appears to the competent authority that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

If you have any queries or need further information in relation to this submission, please contact me directly. I would also be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.

Yours Sincerely,

A handwritten signature in blue ink, appearing to read 'Cian O'Mahony'.

Cian O'Mahony
SEA Section
Office of Evidence and Assessment