

20191011-SRA-RSES-MA

Southern Regional Assembly
Assembly House
O'Connell Street
Waterford

Sent via email to: rses@southernassembly.ie

11th October 2019

RE: Submission on the Proposed Material Amendments for the Draft Regional Spatial and Economic Strategy for the Southern Region

Dear Sir/Madam,

An Taisce welcome the opportunity to comment on the proposed material amendments to the Draft Regional Spatial and Economic Strategy for the Southern Region. We wish to make the following comments, which we request the Assembly take into consideration in the finalisation and adoption of the RSES.

Yours sincerely,

Phoebe Duvall
Planning and Environmental Policy Officer
An Taisce – The National Trust for Ireland

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Directors: Philip Kearney (Acting Chair), Trish O'Connell (Acting Vice-Chair), Eric Conroy (Acting Treasurer), John Sweeney, Nick Armstrong

Material Amendment 2

An Taisce welcomes the addition of context on the urgency of the climate crisis. The Assembly should ensure that the three priority areas are reflected in the amended RPOs throughout the Strategy.

Material Amendment 20

An Taisce welcomes the prioritisation of serviced site initiatives. We also consider that the RPO should include stronger objectives on promoting compact growth in towns and the properly phased provision of services as well as strictly limiting linear sprawl and one-off housing.

Material Amendment 21

To prevent the unsustainable spread of one-off house, An Taisce recommends removing the addition of "local" in the context of exceptional need.

Material Amendment 36

An Taisce submits that commitments regarding the creation of Marine Protected Areas should be included in any objectives related to marine spatial planning.

Material Amendment 40

An Taisce very much welcomes the addition of an RPO for a Regional Decarbonisation Plan. We submit that the RPO should include a commitment to strict timetabling of the "existing and future targets."

Material Amendment 43

An Taisce considers that the RPO in relation to the decarbonisation of agriculture does not adequately address emissions reduction in the sector, especially given the RSES's now strengthened recognition of the urgency of the climate crisis (see MA 2).

Meeting national and global greenhouse gas targets to stabilise the climate at less than two degrees warming over preindustrial levels is incompatible with Ireland's current and expanding bovine agriculture model.

Ireland has the land area, soil quality, climate and rural enterprise potential for diversified plant based food production in vegetables, pulses, fruit, nuts, seeds and oils, to substitute for produce currently imported into the EU from Asia (eg. nuts and vegetable oils) and from the EU into Ireland (eg. fruits and vegetables). The Southern Region therefore has the opportunity to take leadership in climate mitigation through the inclusion of RPOs on diversifying food production and reducing beef and dairy production.

Material Amendments 41, 46 & 100

An Taisce welcomes the objectives to discontinue fossil fuel use and support renewable heat generation. We would, however, call the Assembly's attention to several overarching issues concerning renewable gas.

Large-scale biogas plants would, in all likelihood, require additional organic materials, such as grass silage, to be grown to supplement waste products. As a result, this may increase the amount of nitrogen fertiliser applied to agricultural lands, thereby increasing nitrous oxide emissions from soil as well as the risk of water pollution. This requirement for organic material could also spur land use changes that degrade habitats that already provide valuable carbon sinks such as peatlands and forests.

Anaerobic digesters frequently leak methane, a potent greenhouse gas. Digesters also do not remove ammonia (in most cases), and Ireland is already in breach of its ammonia obligations under the EU National Emission Ceilings Directive.

More broadly, expansion of biogas infrastructure represents expanded investment in the country's overall gas infrastructure in a time when Ireland must be moving rapidly away from gas use in order to meet national and international climate targets.

Material Amendment 49

An Taisce welcomes the additions to the RPO concerning biodiversity. To most effectively address the current global biodiversity crisis, we recommend a further addition requiring the creation of a targeted and timetabled regional plan for addressing biodiversity loss.

Material Amendments 58, 64, 65, 114 & 134

Air travel is the most greenhouse gas-intensive form of transport. Aviation emissions have more than doubled in the last 20 years, and the sector is responsible for an estimated 4.9% of human-caused global warming. To meet climate targets at regional, national, European and international levels, Ireland has no capacity for expansion of the aviation industry.

The SEA published in conjunction with the draft RSES as well as the subsequent amendments has not sufficiently addressed or mitigated the greenhouse gas impact of aviation expansion. Accordingly, there is no basis under the SEA process for considering airport capacity expansion in Cork, Shannon, Waterford, or Kerry.

Material Amendment 61

RPO 137 (b) An Taisce submits that potential port expansion in the Southern Region should be limited to Foynes. The existing redundant rail connect could be reopened, therefore providing a more sustainable means of transporting freight.

RPO 137 (e): Both Moneypoint and Cahiracon are located on the Shannon Estuary, which has been designated as both an SAC and an SPA. Moneypoint does not have the capacity for adequate transport access to facilitate a port. Cahiracon is located in a wooded section of the estuary and is therefore an area of high scenic amenity and biodiversity value. An Taisce therefore considers both locations unsuitable for deep-water ports.

Material Amendment 68

An Taisce submits that a policy should be added to prioritise the development of walking and cycling infrastructure to facilitate a modal shift away from car dependence. LTPs should include targeted and timetabled plans for creating such a modal shift based on the Smarter Travel framework.

Material Amendments 73, 74, 125

An Taisce considers that the Cork-Limerick motorway is not justified on traffic demand grounds and would exacerbate unsustainable car dependence through the promotion of longer distance, car-based commuting.

Material Amendments 76 & 77

An Taisce welcomes the enhanced commitments to improving the region's rail network and delivering high quality infrastructure for walking and cycling.