An Taisce
The National Trust for Ireland

Planning Department
Roscommon County Council
Áras an Chontae
Roscommon

Submitted via online portal

2nd July 2021

RE: Draft Roscommon County Development Plan 2021-2027

To Whom It May Concern,

An Taisce welcomes the opportunity to comment on the Draft Roscommon County Development Plan 2021-2027. We wish to make the following submission, which we request the Council take into consideration in the finalisation and adoption of the Plan.

We hope and trust that the following suggestions and observations on the Draft County Development Plan 2021 – 2027 will be taken into account at the final stage of plan preparation, and will lead to an improvement in the quality of life in Roscommon and to better protection of our environment and climate.

We would also request that the Council make An Taisce known of any further consultation periods regarding the making of the new Development Plan.

Yours sincerely,

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An Taisce – The National Trust for Ireland

Submission on the Draft Roscommon County Development Plan 2021-2027



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1. Overarching Comments

The new Roscommon County Development Plan (hereafter referred to as the CDP, Draft CDP or Draft Plan) should represent a catalyst for positive change and facilitate the development of the county in a plan-led, sustainable manner. The CDP should strive to establish a coherent framework for the coordinated sustainable economic, social, cultural and environmental development of the county in line with the UN Sustainable Development Goals.

An Taisce's key objectives in making this submission on the Draft County Development Plan include:

- Ensuring that the climate and biodiversity loss emergencies are addressed at all levels of planning and development;
- Ensuring that national, regional and local policy and guidelines are implemented;
- Reducing Ireland's greenhouse gas emissions in accordance with EU law;
- Protecting town centres, and counselling against unserviced development and sprawl;
- Promoting compact development served by public transport in accordance with national Smarter Travel policy;
- Promoting rapid and extensive shifts toward walking and cycling and away from private car use;
- Reducing unsustainable fossil fuel use such as in heating buildings and in transport (e.g., private car dependency);
- Ensuring the implementation of EU environmental law and protecting habitats and biodiversity, particularly Natura 2000 sites;
- Protecting our water bodies and water quality, including through the prevention of inappropriate development;
- Conserving the quality of the Irish landscape, archaeological monuments and built heritage, particularly protected structures;
- Promoting efficient investment in public infrastructure and services; and,
- Promoting local self-reliance, public health and quality of life.

We are pleased that many of these goals already form key parts of the Draft CDP.

2. Addressing Climate and Biodiversity Emergencies

Given that the global climate and biodiversity loss emergencies are the defining challenges of our time, An Taisce supports the significantly increased emphasis on climate mitigation and adaptation in the Draft Plan, particularly in Chapter 8.

All climate mitigation provisions in the new CDP must be assessed against Ireland's fair share emissions reduction commitments in line with the Paris Agreement and the need to limit warming to 1.5C over pre-industrial levels. Similarly, the new Plan should ensure that development decisions are also assessed against these commitments.

As climate change both impacts and is impacted by all areas of planning and development, An Taisce recommends that each chapter of the new plan be directly assessed against climate objectives and targets, including those outlined in the Paris Agreement and EU policy. While Appendix 5 provides a helpful reference for the inclusion of mitigation and adaptation measures in the other Plan chapters, An Taisce considers that the Draft Plan could be greatly strengthened by further integration. We would highlight the recent Draft Longford Development Plan, which provides a useful example of climate integration throughout the plan. Each chapter contains a climate context section with climate-specific objectives relating to the theme of the chapter. We recommend that a similar approach be incorporated in the Roscommon Plan.

2.1 Biodiversity Loss

While the Draft CDP has a strong focus on climate, An Taisce considers that it does not sufficiently address the concurrent biodiversity loss emergency. The 2018 "Living Planet Report" from the World Wildlife Fund[1] presented a very bleak picture of the state of global biodiversity. There has been an overall 60% decline in species population size in just over 40 years (1970-2014). This decline stands at 83% for freshwater species. We would also draw the Council's attention to a recent paper[2] published by an international cohort of researchers highlighting the scale of the challenge posed by biodiversity loss, the implications for human society and the lack of adequate responses from policy makers.

We submit that the new CDP should directly and thoroughly address the gravity of the biodiversity crisis in a manner commensurate to the way it in which addresses the climate crisis. While there are many robust policy objectives in the Draft Plan aimed at ecological protection, we do not consider that they sufficiently consider the context or address the scale of the current biodiversity loss emergency.

[1] Living Planet Report, World Wildlife Fund (2018): https://www.worldwildlife.org/pages/living-planet-report-2018
[2] Bradshaw et al (2021) Underestimating the Challenges of Avoiding a Ghastly Future, Frontiers in Conservation Science: https://www.frontiersin.org/articles/10.3389/fcosc.2020.615419/full ; Covered in the *Irish Times* here: https://www.irishtimes.com/news/environment/a-ghastly-future-leading-scientists-offer-bleak-prediction-for-civilisation-1.4456653

2.2 Just Transition

The equitable and united transition as a society towards renewable energy is a central tenet of national climate policy. Ensuring a 'Just Transition' should be a guiding principle in forward planning. As the economy and society move increasingly away from fossil fuels and emissions-intensive industries, it is imperative that workers and other stakeholders are provided with the resources and training they need to play a positive role in Ireland's decarbonisation challenge.

An Taisce therefore strongly supports the commitments in Section 6.6 of the Draft Plan to facilitating a Just Transition for the many people impacted by the cessation of commercial peat harvesting. We recommend that the Just Transition principle is integrated into other sections of the Draft Plan where relevant.

The onset of the Covid-19 pandemic has given rise to the current environment of remote learning and working from home - an unprecedented amount of time spent at home is leading to higher energy consumption levels over extended periods of time. These trends are increasing the amount of households experiencing some degree of energy poverty or vulnerability. Energy poverty is the inability or excessive difficulty to afford adequate heat and electricity. While financial schemes are available for homeowners to retrofit their households and install renewable energy technologies such as solar PV, these are limited and require a prohibitively high capital investment for many. Moreover, elderly and disabled individuals are identified to be those at the highest risk of energy poverty, spending the most time at home and often living in energy inefficient dwellings.

In light of these trends, Chapter 8 on energy could be strengthened by a commitment to prioritise elderly, disabled and lower income individuals when targeting retrofit schemes. Energy poverty affects individuals' physical and mental health and as a result restricts them from actively participating in the community. Tackling this problem could also be outlined in the objectives on housing.

Similarly, managing food production and sustainable land use while addressing the climate and biodiveristy emergencies is one of the primary challenges facing Ireland's policy makers and farming communities over the lifetime of the new CDP. The ambition in the Climate Bill currently in the Oireachtas (at the time of writing) to achieve a 51% reduction in emissions by 2030 will require far-reaching and radical changes in all sectors, including agriculture.

Yet these changes must be equitable and support the viability and vibrancy of rural life in Roscommon. A Just Transition model is needed to plan and deliver a package of complementary interventions to secure livelihoods while shifting rapidly to sustainable methods of food production. This should help incentivise farm diversification, increase farm incomes and

security, restore biodiversity on farmland and good water quality, lower greenhouse gas and ammonia emissions, and contribute to Ireland's food security. We therefore welcome Policy Objective CAEE 8.21 to "*Engage with all stakeholders within thefarming community who seek to transition from traditional farming enterprises, into more sustainable agricultural initiatives, identified as being more environmentally sustainable*."

We also recommend that commitments be added to Chapters 8 and/or 11 to address the disproportionate impact of climate change on marginalised communities.

3. Sustainable Settlement

The defining pattern of spatial development in Roscommon and around Ireland in recent decades has generally been of a sprawling, uncoordinated nature where land has been developed in a 'leapfrog', low-density pattern. This type of land use has diminished the liveability of areas, created places that lack adequate public facilities, and generated car dependency for long commutes. Section 2.9 of the Draft Plan notes that the proportion of one-off houses in Roscommon is particularly highly, representing 56% of all occupied dwellings in the county compared to 26% nationally.

To achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for citizens, it is imperative that the new CDP addresses future population growth and continues to encourage a shift away from dispersed, car-orientated development patterns to walkable, cycleable, transit-orientated and consolidated urban forms. A crucial aspect of this will be the maintenance of and improvement in investment in public transport, walking and cycling to offer communities viable alternatives to private cars.

The prioritisation of future development in Roscommon's towns towards efficient, compact, and serviced locations in accordance with the sequential approach and existing infrastructural capacity is critical. The CDP should be guided by the existing essential social infrastructure (schools, community facilities, etc.) and physical infrastructure (transport, water services, communications, etc.), including realistic prospects for addressing capacity constraints. Where services are not available, there should be a reasonable expectation of their provision within the plan period. Land should not be zoned if there is no reliable prospect of providing key physical infrastructure within the plan period or a within reasonable time period thereafter, such as improved roads, footpaths, drainage and lighting to serve likely future development. The Council should engage with the providers of essential physical and social infrastructure and ensure that the town-specific policies are based on realistic assessments regarding the funding and timing of such infrastructure, recognising that some levels of strategic infrastructure may take a number of cycles to provide.

An Taisce therefore welcomes the many commitments throughout the Draft Plan to, for example:

- Promote compact growth;
- Direct new rural development to existing villages and settlement clusters;
- Create vibrant communities in both urban and rural areas;
- Direct development to infill sites, brownfield sites, vacant/derelict sites, etc.;
- Focus on regeneration and the social, economic and environmental benefits thereof;
- Support the development of serviced sites;

As an additional measure to address compact settlement creation and the issues discussed above, An Taisce recommends that the Council make the seven location test standards for new housing outlined in the now replaced National Spatial Strategy 2002 (see chart below) a mandatory CDP requirement for new housing development. Unlike sustainability and quality of life indicators, these should be strictly enforced threshold standards without which no development should be permitted. This requires that zoning and decisions for new housing be conditional on integration with existing communities, affordability and mix of housing types, walking and cycling access to local services and schools, public transport access to employment locations, and availability of recreation facilities.

	Evaluation Considerations
The Asset Test	Are there existing community resources such as schools, etc. with spare capacity?
The Carrying Capacity Test	Is the environmental setting capable of absorbing development in terms of drainage, etc.?
The Transport Test	Is there potential for reinforcing usage of public transport, walking and cycling?
The Economic Development Test	Is there potential to ensure integration between the location of housing and employment?
The Character Test	Will the proposal reinforce a sense of place and character?
The Community Test	Will the proposal reinforce the integrity and vitality of the local community and services that can be provided?
The Integration Test	Will the proposal aid an integrated approach to catering for the housing needs of all sections of society?

Tests for housing locations from the National Spatial Strategy 2002

4. Towns and Villages

An Taisce welcomes the approach taken in the Draft CDP towards promoting town centre vitality and regeneration and the various commitments in the Towns and Villages Policy Objectives. These are also supported by the 2020 Programme for Government, which includes a mandate for implementing a Town Centres First policy to *"implement a strategic approach to town centre regeneration by utilising existing buildings and unused lands for new development, and promote residential occupancy in our rural towns and villages. We will use the National Planning Framework as our template."*

5. Rural Development and Natural Resources

5.1 Agricultural Activity and Diversification

Current models of intensive agriculture in Ireland are resulting in an array of adverse impacts including to water quality, air and climate, and biodiversity.

The EPA's latest report on Water Quality in 2019 (published in December 2020)[3] reveals that water quality trends in Ireland continue to be problematic. The report indicates that over one third of rivers and a quarter of lakes are failing to meet their environmental quality standards for nutrients. Of particular concern are the increasing pollution trends since 2015, with nitrate found to be increasing in nearly half of river sites, and phosphate increasing in a quarter of sites. This is in stark contrast to the situation in 2015 when nitrate was increasing in only 1.4% of our rivers, and phosphate in 4%. Runoff from agriculture is a key driver of these declines, particularly as herd numbers and fertiliser use increase.

This EPA water quality report is a clear indication that the water protection measures currently in place under the Nitrates Directive are failing to adequately protect our water quality, despite increased investment in this area, with the establishment of Agricultural Sustainability Support and Advisory Programme (ASSAP), and other measures intended to address this. Ireland has obligations under the EU Water Framework Directive to bring all water bodies into good status by 2027, and roughly 50% of waters are currently failing this.

Ireland is also in ongoing breach of its 116kt per annum limit under the National Emissions Ceiling Directive (2016/2284/EU),[4] 99% of which is caused by agriculture. This breach is

[3] EPA (2020) Water Quality in 2019: http://www.epa.ie/pubs/reports/water/waterqua/Water%20Quality%20in%202019%20-%20an%20indicators%20report%20(web).pdf

[4] EPA, June 2020, Ireland's Air Pollutant Emissions: https://www.epa.ie/pubs/reports/air/airemissions/irelandsairpollutantemissions2018/EPA-Air-Pollutant-Emissions-

currently subject to an EU legal infringement complaint. Ireland is legally obliged under the Directive to decrease its ammonia emissions to 107.5kt by 2030.

While previous reporting indicated that Ireland's total ammonia emissions were already in breach of EU thresholds since 2016, this is now recognised as a serious undercount. Data released by the EPA in June 2021[5] highlights that the State has been non-compliant for seven out of the last nine years, driven by growth of the agriculture sector.

Ammonia is a toxic gas that is a major by-product of animal-based agriculture that combines with other pollutants to form $PM_{2.5}$, one of the most dangerous and deadly types of air pollution particles. This small particulate matter is well known to be harmful to health, penetrating deep into the lungs, and is linked to higher death rates, respiratory problems, cardiovascular diseases, cognitive decline and low birth weights. A recent study found that at least 3,000 premature deaths could be prevented annually in the UK by cutting ammonia emissions in half.

This gas also poses a serious threat to biodiversity, with well-established links between ammonia and biodiversity loss. It can cause soil acidification and runoff of polluting nitrates into nearby waterbodies. It also impacts some of the country's most pristine habitats such as bogs and heaths, killing the sensitive species, such as lichens and mosses, and damaging whole ecosystems.

Agriculture is also a major emitter of greenhouse gases and is contributing significantly to Ireland's ongoing failures to reach its legally binding Paris Agreement targets; GHGs from agricultural account for one third of Ireland's total emissions.

An Taisce fully recognises that agriculture will continue to form a key part of the rural economy in Roscommon. In the interest of making it maximally sustainable, we welcome Policy Objective RD 5.2 to "*Encourage and facilitate agricultural diversification into agri-businesses such as organic foods and rural tourism, as a means of promoting rural diversity and strengthening the local economic base*." We would recommend the inclusion of an additional objective to specifically promote the production of vegetables, grains, nuts, pulses, fruits, etc.

We also consider that there is a general lack of consideration of the scale of the changes needed in the agricultural sector to address the aforementioned environmental issues. While the climate impact of agriculture is addressed briefly in Chapter 8, robust consideration is also needed in terms of impacts to water, air and biodiversity, as outlined above.

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website.pdf; https://www.epa.ie/news-releases/news-releases-2021/ireland-continues-to-be-in-non-compliance-with-the-eu-national-emissions-ceiling-directive.php

[5] EPA, June 2021, Ireland's Air Pollutant Emissions: https://www.epa.ie/publications/monitoring--assessment/climate-change/air-emissions/EPA-Irelands-Air-Pollutant-Emissions-report_2021Final.pdf

We therefore submit that agricultural development should only be supported in the CDP policy objectives where it is demonstrably shown to not exacerbate deterioration in water quality, to comply with the Habitats Directive, to not exacerbate the current exceedence of national ammonia limits, and to not further increase GHG emissions with respect to EU and national climate change targets.

It is submitted that a Policy Objectives is required to ensure that permission for expanded agricultural developments is only granted when the direct, indirect and cumulative impacts of a proposal to have been evaluated and mitigated if necessary. This includes impacts in the wider landholding (outside of the red line-bounded site) resulting from activities resulting from or facilitating the proposal.

The new CDP should also require compliance with River Basin Management Plans as well as the use of catchment sensitive farming practices.

5.1.1 New European Strategies

In May 2020, in furtherance of the European Green Deal, the EU Commission published in parallel "A Farm to Fork Strategy" and the "EU Biodiversity Strategy for 2030 - Bringing nature back into our lives". The Biodiversity Strategy includes 14 key targets, the majority of which are relevant to agriculture (see section 10 below for the full list).

We submit that the policies, objectives and targets of these two strategies should be incorporated into the new CDP. We therefore recommend the inclusion of the following policy objective:

> "*Roscommon County Council will implement the objectives and targets at county level of the EU 'A Farm to Fork strategy', published in May 2020. The Council will also implement the targets of the 14 point EU Nature Restoration Plan in the 'EU Biodiversity Strategy for 2030 - Bringing nature back into our lives'. Agricultural development proposals must demonstrate compliance with the targets and policies of both strategies."*

5.2 Forestry

An Taisce considers that the policy objectives around forestry (RD 5.6-5.8) should better differentiate between the planting of native woodland and the planting of other species such as sitka spruce, which create what are essentially ecological dead zones. Though it is covered in RD 5.8, we would suggest that greater emphasis be placed on facilitating the planting of native broadleaf woodlands.

6. Economic Development

6.1 Extractive Industries

We submit that an additional policy objective be included to require strict enforcement against unauthorised development and of conditions applied to permitted quarry development. We also consider that Section 35 of the Planning and Development Act 2000 (as amended) regarding past failures to comply should be rigorously applied to proposals for continued or expanding quarrying operations.

6.2 Sustainable Tourism

It is a particular objective of An Taisce that future tourism and recreational visitor promotion nationally should be as car-free as possible. A new tourist model is required based on longer area-based stays rather than drive-through tourism, and on enhanced promotion and development of safe greenway cycling routes, and attractive walking and hiking routes for all ages and abilities. It is noted that the 2020 Programme for Government sets out a range of policies on tourism including to: "*Develop Ireland as a **long stay** tourism destination to spread tourism more evenly across the country. This will help reduce emissions and maximise economic return*" (emphasis added).

We also welcome the focus on the continued development of a network of walking and cycling routes of all types in the county. We recommend that an additional Policy Objective be added that commits to do so while avoiding conflicts with sensitive ecological sites and ensuring compliance with the Habitats and Birds Directives.

We consider that there is also a need to better integrate sustainable transport integration with tourism. We recommend the inclusion of additional explicit objectives to:

- Increase the access to public transport, walking and cycling options from key tourist destinations and accommodation hubs;
- Increase car-free, long-stay trips; and
- Provide for additional tourist accommodation in appropriate locations, particularly in areas with existing services and infrastructure.

7. Infrastructure, Transport and Communications

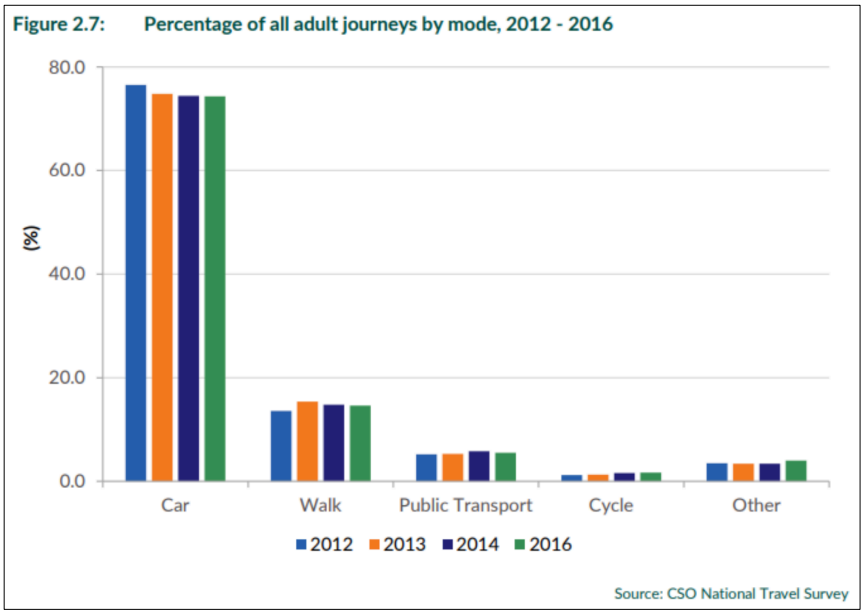
7.1 Sustainable Transport

To achieve compact and sustainable settlement, combat rising transport emissions, and improve the quality of life for people in Roscommon, it is imperative that the CDP addresses future population growth and encourages a shift away from dispersed settlement towards more consolidated urban forms. A crucial aspect of this is that investment in public transport, walking and cycling is maintained and improved in order to offer communities a viable alternative to private cars.

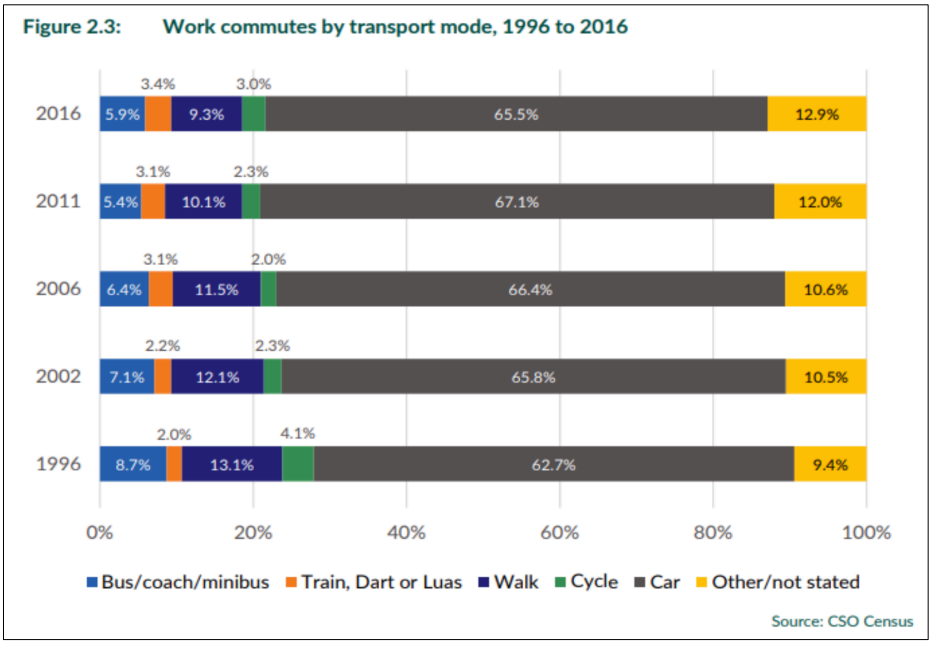
The data presented in a recent Government review of sustainable mobility policy[6] make it unequivocally clear that Ireland has failed to achieve the modal shift in transport that was envisioned in the Smarter Travel policy (2009) and a suite of other transport-related policies. Yet, as noted in the review, transport[7] accounted for over 27% of Ireland's emissions in 2017, with 52% of that generated by private cars.

CSO data show that private car dependence is extremely high across Ireland - 74.3% of all journeys are made by car. 15% are made on foot while only 5.5% are by public transport and 2% by bicycle (see chart below). We note that the National Cycling Strategy, which ran in parallel to Smarter Travel, provided that 10% of all journeys would be made by bike by 2020. Notably, public transport use and accessibility in smaller towns and rural areas is also particularly poor.

[6] https://www.gov.ie/en/consultation/f1b503-public-consultation-on-a-review-of-sustainable-mobility-policy/
[7] This does not include aviation or maritime travel emissions.



Similarly, a cornerstone target of the Smarter Travel policy was that commuting journeys made by car should drop from 65% to 45% by 2020 while commuter journeys by walking, cycling and public transport should increase to account for 55%. As the 2016 census data below shows, we have completely failed to achieve that. In fact, the share of car journeys to work has *risen* since 1996 and actually surpassed the Smarter Travel baseline of 65%. The percentage of commutes made by cycling, walking or taking the bus has decreased and is nowhere near the 55% share stipulated by Smarter Travel.



We therefore welcome the numerous policies in Chapter 7 of the Draft Plan that support the integration of land use and transport planning, facilitate sustainable transport initiatives and promote walking and cycling.

However, we submit that robust targeted and timelined plans are needed to ensure the efficient implementation of these policies. We recommend that the current modal split in Roscommon be analysed and that specific modal shift targets for 2027 be set in line with the Smarter Travel policy.

One specific measure that An Taisce recommends for inclusion is an explicit objective ensuring that sufficient public transport capacity as well as safe cycling and pedestrian infrastructure be provided prior to or in tandem with any new residential development. Increased sustainable transport infrastructure and capacity provision needs to come before expanded residential development, particularly in larger towns and their catchment areas.

7.1.1 Programme for Government

The 2020 Programme for Government sets out as overarching mission: "*A Better Quality of Life for All"* with *"A national clean air strategy," "Better work life balance"* and *"a fundamental change in the nature of transport in Ireland"* as key objectives. It sets out as immediate priority actions:

> *"Necessary improvements in climate impact, quality of life, air quality and physical and mental health demand that every effort is made by the Government to make active travel and public transport better and more accessible."*
>
> *"Each local authority will be immediately mandated to carry out an assessment of the road network, to see what space can be allocated for pedestrians and cyclists. This should be done immediately*."

In light of the Programme for Government mandate and the aforementioned transport data, we cannot overstate the urgency with which the Council needs to address the current unsustainability of transport in the county and the ongoing failure to achieve meaningful progress toward a modal shift away from private car use. We therefore recommend that provision for the immediate review called for in the Programme for Government be included in the CDP.

7.1.2 Road Investment and Planning

An Taisce considers that any future investment in motorway or dual carriageway schemes, other than small-scale bypasses to relieve urban congestion points, would be a misdirection and misspending of limited public money. Policy and investment in Roscommon should be reprioritised away from road infrastructure (with the exception of necessary maintenance and town bypasses) and redirected to support public and active transport projects and cycling infrastructure in line with the Programme for Government commitment to a 2:1 ratio of expenditure between new public transport infrastructure and new roads.

Significant amounts of existing road space needs to be reallocated for high quality segregated cycle lanes and footpaths. We also recommend the inclusion of an additional Policy Objective under ITC 7.12-7.20 to prioritise pedestrians, cyclists and public transport users on local roads.

7.2 Water

The management of surface and ground water in accordance with the provisions of the EU Water Framework Directive (WFD) will be one of the most crucial challenges in this new CDP. Ireland faces an immense challenge in achieving 'good' status in all water bodies by 2027 as required by the WFD (see also the section on agriculture above).

We would submit that a specific objective is needed to require the consideration of WFD compliance in the granting of planning permissions.

7.2.1 Private Treatment Systems

The ongoing proliferation of private wastewater treatment systems will present significant challenges for the achievement of Ireland's legally binding water quality targets under the WFD. Therefore, the CDP should ensure the adequate provision of serviced sites within close proximity to established water/wastewater infrastructure, where a connection to services can be readily facilitated, and where there is sufficient cumulative capacity within the wastewater treatment plant. We recommend that a specific Policy Objective be included in Section 7.7 to ensure that sufficient wastewater treatment infrastructure exists or will be provided prior to any grant of permission for additional development.

We also recommend the insertion of a policy objective to promote changeover from septic tanks to public collection networks in all cases where this is feasible.

7.2.2 Unassigned Waterbodies

We would highlight the recent court ruling by Justice Hyland (2018 740 JR), which clarifies how unassigned waterbodies must be treated when assessing planning applications against WFD requirements, with implications for projects in proximity to unassigned waterbodies:

> "*The WFD, as interpreted by the CJEU, requires a Member State to ensure that the requirements of Article 4 are met before permission is granted. It cannot be so satisfied in respect of development affecting a water body whose status has (in breach of the WFD and the implementing regulations in Ireland) not been assigned by the EPA*." [para 130 2018 740 JR]

It is submitted that the new CDP should take account of this ruling and its implications for granting planning permissions.

7.2.3 Flood Risk

We would submit that where flood mitigation measures are necessary, soft engineering solutions for the management of flood risk should preferentially be employed over hard engineering solutions where possible.

We also submit that consideration of the potential impacts from climate change should be included as an assessment requirement for applications for planning permission in areas at risk of flooding and that all flood risk assessments should take account of the most up to date climate projections.

8. Climate Action, Energy and Environment

See Section 2 of this submission for comments on climate.

8.1 Energy

We welcome the Draft Plan's consideration of renewable energy development of various types and scales across Roscommon and well as the many policy objectives supporting and facilitating this. We also welcome the recognition that the development of renewables must be done with regard to ecological constraints, Habitats Directive requirements, heritage considerations, landscape, local amenity, etc.

8.1.1 Anaerobic Digestion

If the production of biogas through anaerobic digestion is to be considered as part of Roscommon's renewable energy development (for instance, through Policy Objective RD 5.3), it should *only* be where the sustainability of this resource is justified. In order for bioenergy to be deemed renewable and to contribute to overall emissions reduction, the feedstock sources and the supply chain of these feedstocks must be assessed to be sustainable.

For example, while the burning of biogas generated from biomass, slurry, etc. might be deemed 'carbon neutral', the emissions that contribute to the growth, harvesting and transport of the feedstock must also be considered, and can negatively impact bioenergy's overall contribution to climate mitigation. The fertiliser used to accelerate the growth of energy crops and feed cattle, which eventually produce slurry, not only produce emissions but also contribute to water pollution. In the worst cases, the emissions mitigation potential of biogas may be negligible.

Anaerobic digestion predicated on increased grass/energy crop production should not be permitted in light of the increased levels of fertiliser input needed to grow the grass and the associated water quality and climate impacts. The use of existing waste streams for energy provision are often a more sustainable option as they do not promote an increase in production of energy crops, which can increase NO_2 soil emissions and water quality impacts through higher requirements of fertiliser.

However, with regard to the use of slurry, intensive cattle farming is also a major emitter of greenhouse gases and is contributing significantly to Ireland's ongoing failures to reach its legally binding Paris Agreement targets. Any use of slurry for bioenergy production should not be reliant upon or drive further bovine agriculture intensification.

To ensure the sustainability of biogas production, the sustainability of the biogas's end use must also be fully assessed. Permission for biogas facilities should only be granted where the biomethane will not be mixed with fossil gas, as this would exacerbate lock-in to fossil fuel use and contribute negatively to Ireland's potential to reach its 2030 emissions reduction targets. Supplying biogas to off-grid industrial users would be a potentially sustainable option, provided it is used for electricity generation and is not mixed with fossil gas. Biogas can also be sustainably used to power buses and delivery vehicles in urban areas, which will have the parallel benefit of reducing air pollution.

The CDP must therefore ensure that any provision of bioenergy is accomplished in a sustainable manner and supported where it can be demonstrated that the feedstock source is sustainable and where the end product will not be mixed with fossil gas.

9. Built and Cultural Heritage

Ireland's unique built and cultural heritage in increasingly threatened with destruction. Ireland is a signatory to UNESCO's Convention Concerning the Protection of the World Cultural and Natural Heritage ratified by Ireland in 1991 and the Granda Convention ratified in Ireland in 1995. These conventions provide the basis for our national commitment to the protection of architectural heritage, the importance of "*handing down to future generations a system of cultural references*". To be effective, it relies on its signatory countries implementing their own national protective regimes.

The CDP should ensure the effective promotion of the Architectural Heritage provisions of Planning and Development Act 2000 (as amended) and therefore the protection of Roscommon's built heritage, including Architectural Conservation Areas (ACAs) and Protected Structures.

Crucially, we submit that Chapter 9 should be amended to include policies for monitoring buildings at risk and using the provision of Section 59 of the Planning Act to serve notices of endangerment to negligent property owners.

9.1 Protection of Rathcroghan Archaeological Complex

We note section 9.8 on the Rathcroghan Archaeolgocal Complex. We consider that a specific Policy Objective should be added to ensure the effective protection of archaeology and landscape setting of the royal site of Connaught in considering all categories of development.

10. Biodiversity and Natural Heritage

Ireland has a poor record when it comes to protecting the natural environment. The sprawling nature of development is a driving force for habitat fragmentation, biodiversity loss and agriculture-related land loss and is contributing to climate change.

The 2019 report on "The Status of EU Protected Habitats and Species in Ireland" (prepared every six years as required by Article 17 of the EU Habitats Directive)[8] illustrates the poor condition of Ireland's biodiversity. Out of Ireland's 59 European protected habitats, 85% were assessed as being in an unfavourable conservation status and 46% suffering from ongoing declines. The report highlighted agriculture and development (housing, commercial, industrial, and recreational) as two of the primary threats facing these habitats.

[8] Habitats Directive Article 17 Report Summary 2019:
https://www.npws.ie/sites/default/files/publications/pdf/NPWS_2019_Vol1_Summary_Article17.pdf

In light of the above, the urgency with which we need to address the biodiversity loss emergency must be reflected in the CDP. As such, we are pleased to see the suite of policies aimed at biodiversity protection and enhancement, including for Roscommon's Special Areas of Conservation, Special Protection Areas, and Natural Heritage Areas (existing and proposed).

However, the implementation and enforcement of these policies must be upheld in the planning process at all levels. We therefore welcome Policy Objectives NH 10.4-10.6 on adherence to Habitat's Directive obligations.

10.1 Peatlands

The commitments in Chapters 8 and 10 to restoring, preserving and designating peatlands are welcome. It is submitted, however, that any provision for development on peatlands must be subject to full sustainability assessments, particularly in relation to carbon and biodiversity.

We also submit that an additional policy objective should be added to state: "*The extraction and use of peat for horticulture is not to be permitted"*.

10.2 EU Biodiversity Strategy

We recommend that the implementation of the 14 points in the EU Biodiversity Strategy 2030 should be included as a specific biodiversity objective (with the exception of the marine-related objectives):

1. *Legally-binding EU nature restoration targets will be proposed in 2021, subject to an environmental impact assessment. By 2030, significant areas of degraded and carbon-rich ecosystems are restored; habitats and species show no deterioration in conservation trends and status; and at least 30% reach favourable conservation status or at least show a positive trend.*
2. *The decline in pollinators is reversed.*
3. *The risk and use of chemical pesticides is reduced by 50% and the use of more hazardous pesticides is reduced by 50%.*
4. *At least 10% of agricultural area is under high-diversity landscape features.*
5. *At least 25% of agricultural land is under organic farming management, and the uptake of agro-ecological practices is significantly increased.*
6. *Three billion new trees are planted in the EU, in full respect of ecological principles.*
7. *Significant progress has been made in the remediation of contaminated soil sites.*
8. *At least 25,000 km of free-flowing rivers are restored.*

9. *There is a 50% reduction in the number of Red List species threatened by invasive alien species.*
10. *The losses of nutrients from fertilisers are reduced by 50%, resulting in the reduction of the use of fertilisers by at least 20%.*
11. *Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan.*
12. *No chemical pesticides are used in sensitive areas such as EU urban green areas.*
13. *The negative impacts on sensitive species and habitats, including on the seabed through fishing and extraction activities, are substantially reduced to achieve good environmental status.*
14. *The by-catch of species is eliminated or reduced to a level that allows species recovery and conservation.*

10.3 Urban Greening

We would highlight Point 11 of the aforementioned EU Biodiversity Strategy that: "*Cities with at least 20,000 inhabitants have an ambitious Urban Greening Plan*." With regard to greening urban and peri-urban areas, Section 2.2.8 of the Biodiversity Strategy states:

> *"Green urban spaces, from parks and gardens to green roofs and urban farms, provide a wide range of benefits for people. They also provide opportunities for businesses and a refuge for nature. They reduce air, water and noise pollution, provide protection from flooding, droughts and heat waves, and maintain a connection between humans and nature.*
>
> *The recent lockdowns due to the COVID-19 pandemic have shown us the value of green urban spaces for our physical and mental wellbeing. While protection of some urban green spaces has increased, green spaces often lose out in the competition for land as the share of the population living in urban areas continues to rise.*
>
> *This strategy aims to reverse these trends and stop the loss of green urban ecosystems. The promotion of healthy ecosystems, green infrastructure and nature-based solutions should be systematically integrated into urban planning, including in public spaces, infrastructure, and the design of buildings and their surroundings.*
>
> *To bring nature back to cities and reward community action, the Commission calls on European cities of at least 20,000 inhabitants to develop ambitious Urban Greening Plans by the end of 2021. These should include measures to create biodiverse and accessible urban forests, parks and gardens; urban farms; green roofs and walls; treelined streets; urban meadows; and urban hedges. They should also help improve connections between green spaces, eliminate the use of pesticides, limit excessive*

mowing of urban green spaces and other biodiversity harmful practices. Such plans could mobilise policy, regulatory and financial tools.

To facilitate this work, the Commission will in 2021 set up an EU Urban Greening Platform, under a new 'Green City Accord' with cities and mayors. This will be done in close coordination with the European Covenant of Mayors. The Urban Greening Plans will have a central role in choosing the European Green Capital 2023 and European Green Leaf 2022.

The Commission will support Member States and local and regional authorities through technical guidance and help to mobilise funding and capacity building. It will also reflect these objectives in the European Climate Pact."

It is therefore submitted that the new Development Plan should provide for the immediate development of an Urban Greening Plan for Athlone and surrounds in conjunction with other urban area planning being done jointly with Westmeath County Council. We would also encourage the development of urban greening plans in smaller towns. Specific timelined and targeted policies for achieving urban greening objectives during the plan period should be developed

9. Strategic Environmental Assessment

The Council has a legal obligation to ensure that the SEA process is robust, effective, and identifies all likely significant effects on the environment under the range of considerations set out in the Annexes to the SEA Directive. To ensure integration of environmental considerations into the plan, a general policy or land use zoning should not be maintained where likely significant effects on the environment are identified.

An Taisce would highlight Article 10, which sets out the provisions for the monitoring of a programme subject to SEA and the obligation for remedial action where unforeseen adverse effects arise:

1. *Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action.*
2. *In order to comply with paragraph 1, existing monitoring arrangements may be used if appropriate, with a view to avoiding duplication of monitoring.*

The provisions of Article 10 are not just for monitoring but, notably, for the remediation of unforeseen adverse effects. Section 8.12 of the 2001 European Commission guidance states that "*Unforeseen adverse effects is better interpreted as referring to shortcomings of the prognostic statements in the environmental report (e.g. regarding the predicted intensity of the environmental effect) or unforeseen effects resulting from change of circumstances*."

10. Implementation and Monitoring

In the absence of rigorous application of policy, the divergence between policy and practice results in unsustainable, economically inefficient, structurally weak and spatially dispersed settlement patterns. Therefore, it is of paramount importance that the new CDP moves beyond objectives within the text and towards robust targets, actions and measures to achieve the tangible implementation of the plan's objectives and policies. The success or otherwise of the forthcoming CDP can only be judged against quantifiable and implementable criteria which are subject to ongoing monitoring. This will be fundamental in creating a sustainable and healthy future for Roscommon that supports the wellbeing of both people and planet.