20190123-EMRA-RSES

Eastern & Midland Regional Assembly,
3rd Floor North, Ballymun Civic Centre,
Main Street,
Ballymun,
Dublin,
D09 C8P5

Sent by email to:
rses@emra.ie

23.01.19

Re: Draft Consultation, Eastern and Midland Regional Spatial and Economic Strategy

Dear Sir/Madam,

An Taisce welcomes the opportunity to make a submission on the Draft Regional Spatial and Economic Strategy ("RSES") for the Eastern and Midland Region.

Yours faithfully,

Doireann Ni Cheallaigh

Planning Officer
An Taisce – The National Trust for Ireland

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1.0 Introduction

The Eastern and Midland Regional Assembly ("**EMRA**") Regional Spatial and Economic Strategy ("**RSES**") should provide a long-term regional level strategic planning and economic framework in support of the implementation of the National Planning Framework ("**NPF**") and the economic policies and objectives of the Government.

The RSES should address in greater detail at a regional scale, identifying regional assets, opportunities and pressures. Distributing future population growth and development across the region in a balanced manner.

It is essential that the RSES acknowledges a global environment of increasing climate impact and ecological destruction.

It poses the challenge of accommodating the projected increase in the needs of the region's current and future population are met (access to high quality housing, jobs, sustainable modes of transport) and provides for the overall health and wellbeing and advances the quality of life of the citizens.

It requires clearly stated, implementable and legally enforceable targets to meet these objectives, in tandem with Strategic Environmental Assessment ("**SEA**"), Appropriate Assessment ("**AA**") and Strategic Flood Assessment ("**SFRA**").

The RSES should be committed to making the Region's cities, towns and villages healthy, attractive and sustainable, and improve the citizens quality of life both now and in the future.

The RSES should be a progressive tool for defining a core set of spatial principles for allocating resources and developing a human environment consistent with the overarching meta-governance challenge of the coming century, emphasise the need to rapidly decarbonise and to reduce greenhouse gas emissions by at least 80% by 2050 in order to avoid the worst impacts of anthropogenic global warming and be a tool for fostering environmental, social and spatial justice in adapting to the inevitable consequences of climate change and resource depletion.

1.1 Summary of Preliminary Issues

The overriding environmental issues facing the Region and relevant objectives can be summarised as follows:

- Climate Mitigation to achieve the level of emissions reduction action required under the Paris Agreement 2015 at Regional level.

- Climate adaptation to the increased storm and flood and animal fodder impact which the Region will face with global temperature average increase reaching 1.5 degrees.

- Applying UN Sustainable Development Goals (SDGs) at Regional level and UN New Urban Agenda to larger urban centres.

- Enhancing food security as well as low carbon and local food production networks.

- Achieving health and wellbeing standards with regard to access to clean air and water, services and recreation.

- Reducing resource consumption and waste generation advancing Circular Economy principles.

- Addressing the level of habitats and species with “Bad” or “Unfavourable “status as evaluated under the Habitats Directive.

- Poor food security and over-dependence on beef and dairy exports, which is having adverse biodiversity, water and ammonia impact, as well as on climate emissions. • Ocean acidification, ocean plastic dispersal, and meeting marine eco system protection obligations of Marine Strategy Framework Directive.

- Meeting EU Directives and other obligations on air, water quality, waste, nitrates and other chemicals.

- Addressing unsustainable settlement and transport generation patterns. • Meeting objectives of Council of Europe Conventions on landscape, archaeology and architectural heritage.

- Enhancing general quality of life standards, such as reduction in commuting time and access to parks, recreational and sporting facilities.

- Giving consideration to all, including wellbeing of children and an aging population.

The following sections address the key concerns that fall within An Taisce’s remit under the Chapters set out in the Draft RSES for the EMRA.

2.0 Strategic Vision and Growth Strategy

The three key principles underpinning the draft RSES and which reflect the three pillars of sustainability include:

1. Healthy Place making – To promote peoples quality of life through the creation of healthy and attractive places to live, work, visit and study in.
2. Climate Action – The need to enhance climate resilience and to accelerate a transition to a low carbon economy recognizing the role of natural capital and ecosystem services in achieving this
3. Economic Opportunity – To create the right conditions and opportunities for the Region and to realize sustained economic growth and employment that ensure good living standards for all.

16 Regional Strategic Outcomes (RSOs) are set out in the RSES, which align with the three key principles. The 16 RSO provides a good basis for future planning in Ireland, however, the Draft RSES, as presently framed, lacks implementable and legally enforceable targets to meet these objectives.

The 16 RSOs have fed into the development of the Draft Growth Strategy, which include "*compact growth, support for rural communities, and integrated transport and land-use*".

Section 3.2 of the Draft RSES has identified Growth Enablers across the region, aligning with the Growth Strategy. These Growth Enablers provides a list of priorities for each part of region to "*meet its potential*". Growth Enablers have been identified for four areas including:

- Dublin Metropolitan Area;
- The Dublin Belfast Corridor;
- Hinterland Area; and
- The Outer Region

The overall objective of the RSES is to take the high-level framework and principles of the NPF and work out more detail at regional and local authority levels. The Growth Enablers identified under the aforementioned areas does not provide any level of detail required to implement the NPF. It would appear that the Growth Enablers are similar to broad objectives of the NPF. (E.g. "*High value assets and amenities to be protected and their use enhanced for all the Region; focus on improving existing economies and creating the quality of life to attract investment; A key focus on the regeneration of small towns and villages to bring vibrancy to rural areas"*).

3.0 People and Place

Chapter 4 [People and Places] sets out a Settlement Hierarchy and the identification of key growth areas in the Regional for significant development up to 2031 and beyond. This chapter provides more detail and identifies specific areas to target development and growth.

3.1 Regional Growth Centres

Athlone, Drogheda and Dundalk have been identified as 'Regional Growth Centre'.

The Settlement Strategy for Regional Growth Centres provides the following.

> "*Support urban regeneration and the delivery of strategic development areas in tandem with key enabling infrastructure with at least 30% of all new homes to be provided in the existing built up area to enable Athlone, Drogheda and Dundalk as significant regional drivers*".

Section 4.5 sets out Regional Policy Objectives for the three Regional Growth Centres. For the three Regional Growth Centres, the Draft RSES provides for the establishment of Urban Area Plans ("**UAPs**") following the adoption of the RSES.

The objective of the UAPs is to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas so that a minimum of 30% compact growth can be achieved.

There does not appear to be an allocated timeframe for the establishment of the UAPs nor is it clear if the UAPs would be on a statutory footing. There is little detail provided on UAPs outside of the provisions of National Planning Objective 70 of the NPF.

The Regional Policy Objectives for the three Regional Growth Centres do not contain any specific percentage based or timetabled targets. All are phrased as vague general objective to "support" or "promote" the relevant Regional Growth Centre.

A number of the Regional Policy Objectives for the Regional Growth Centres are almost identical to existing objectives in the relevant County Development Plan ("CDP") or Local Area Plan ("LAP") for the area. Table 1.1 below identifies the Regional Policy Objectives for Athlone identified in the Draft RSES and the corresponding existing policy set out in the relevant LAP(s)

Draft RSES Regional Policy Objective for Athlone	Existing Policy Objectives for Athlone
RPO 4.4 Ffuture development required to achieve the growth vision for Athlone included in the Joint UAP shall: (a)Support the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth	(a) To prioritise the reuse of vacant and derelict buildings in the town centre for uses including retail development. (**P-RET3 – Athlone Local Area Plan**) This area is located to the north east of the town centre core and is currently an **underused site**, which has been identified for regeneration. The Objective of this site is to optimise the potential of a town centre site, to facilitate a mixed residential scheme (**Section 5.19 Athlone Local Area Plan**)
RPO 4.4 (b) Support the renewal of lands at St. Mel's and Loughanaskin to optimise the potential of this town centre opportunity to facilitate a mixed residential scheme with supporting services and facilities which will support the commercial core of the town, reinforce neighbourhood identity and enhance the physical character of the area.	(b) ST. MEL'S LOUGHANASKIN is identified an opportunity site under section **5.19 of the Athlone Local Area Plan.** This Regional Policy Objective overlaps with the previous RPO (a). As previously stated. St. Mel's Loughanaskin is currently an **underused site**, which has been identified for regeneration. The Objective of this site is to optimise the potential of a town centre site, to facilitate a mixed residential scheme.

RPO 4.4 (c) Support residential development within the Lissywollen South Framework Plan area to develop this strategically located land bank as a highly sustainable and integrated new urban quarter extending from Athlone town centre.	**(c) Existing Plan**
RPO 4.4 (d) Support residential development on existing LAP lands at Curragh Lissywollen, Cornamagh, Cornamaddy and Monksland / Bellanamullia.	**(c) Existing Plan**
RPO 4.5 Promote the expansion of the existing enterprise ecosystem in Athlone…In this regard, recognise the following strategic economic areas: (a) Garrycastle IDA as a centre of excellence for education, research, enterprise and innovation with potentialfor clustering with Athlone Institute of Technology. (b) Blyry – incorporating indigenous and existing industries. (c) Creggan – greenfield site identified for future development of an innovative business park (d) Monksland – support the continued	(**a) Creggan Local Area Plan – Character Area A – Garrycastle. Objectives for Character Area A**: "*To provide for a Centre of Excellence for Education, Research and Innovation with links to Athlone Institute of Technology*" (b) Promoting sustainable economic development and employment creation, within defined economic clusters in established Business Parks such as Garrycastle. Blyry, Athlone Business Park and the Strategic Gateway Zone. (**Section 2.3 (vi) – Athlone Local Area Plan)** **(c) Creegan Local Area Plan** (d) Support the continued

development of the existing industrial sectors at this location.	development of the local economy by promoting the area for industrial and manufacturing development opportunities, particularly in the fields of pharmaceuticals and IT. (**Strategic Aim No.2 Monksland/Bellanamullia (Athlone West) Local Area Plan 2016 – 2022.)**
RPO 4.6: Support the role of Athlone Institute of Technology as a centre of excellence for education and in achieving its status as a Technological University.	To promote the development of facilities connected with outreach programmes between businesses and the third-level institutions (e.g. Research Facilities at AIT), thus promoting Athlone as a centre of excellence in research and development. **(P-ED8 – Athlone Local Area Plan)**
RPO 4.7: Promote Athlone as an urban tourism destination	To promote the linked gateway town of Athlone as an urban tourism destination in its own right and as an access point to a collection of wider county tourist attractions (**P-TRM1 Athlone Local Area Plan)**

Table 1.1 RSES RPOs and LAP Aims and Objectives

The philosophy underpinning the Draft Regional Policy Objectives for the three Regional Growth Centres is predominantly that of economic and population growth.

In the context of current global environmental challenges, this is a poor approach and accords to the dominant neoliberal vision that there is no alternative path to social progress and prosperity, other than through promoting growth.

3.2 Key Towns

There are a number of key factors that need to be considered in order for the cities and towns to achieve their full potential and act as “engines” of economic growth. In order for these areas to attract economic activity, they must firstly be attractive in order for both people and industry to locate.

The ‘liveability’ factor is key to drawing activity into cities and towns. These areas require the development of key physical and social infrastructure to provide for the needs of the cities citizens and to enhance the overall health and wellbeing of their people.

Creating a sustainable urban environment enhances the competitive performance of Key Towns.

Key policy areas to ensure the sustainable growth of urban areas include transport policies, land use policies and environmental policies. In the past, there has been a failure to properly coordinate development with public infrastructure and service needs and civic amenities, which have had a negative impact on the quality of life and competitiveness of our cities. These failures have resulted in increased car dependency, traffic congestion, long commuting times and increased pressures on our natural and built environment, services including water and waste and affecting our ability to reach our emission reduction targets.

The Draft RSES has identified Bray, Maynooth, Swords, Navan, Naas, Wicklow-Rathnew, Graiguecullen, Longford, Mullingar, Tullamore and Portlaoise as ‘Key Towns’ in the Region.

The Settlement Strategy for Key Towns provides the following:

> “*Support the sustainable compact development of identified key towns with at least 30% of new homes to be provided for within the built up area, through regeneration of identified town centre sites so that key towns can act as economic drivers and employment centres for the region*”.

Regional Policy Objective 4.23 provides the following: *“Key Towns shall act as economic drivers and provide for strategic employment locations to improve their economic base by increasing the ratio of jobs to works”.*

The vast majority of the Regional Policy Objectives for each individual Key Town are phrased as vague, general objectives to “*suppor*t” or “*promote*” particular development. Clear and measurable targets are lacking.

Swords

Three Regional Policy Objectives have been identified for Swords [RPO 4.24, 4.25, 4.26]. In addition to the lack of targeted objectives, the RPOs identified for Swords are already existing objectives set out under Section 4.2 of the Fingal County Development Plan and the Swords Strategic Vision 2023 document.

RPO 4.25 provides that *future development required to achieve the growth vision for Swords shall: support the regeneration of underused, vacant or derelict town centre lands for residential/mixed use development to facilitate population growth.*

In order to achieve this objective, an in-depth analysis of vacant homes with the view of re-use needs to be carried out and form part of the RSES.

In the absence of a firm political commitment to national planning, the market produces the places in which we live, in ways, which meet a concern for individualism and profit rather than the needs of society.

Land reform is therefore essential to give the public and communities a stake in development and future value. To acquire land to meet public need, Land Value Tax, CPOs and other powers must be used as levers to transfer ownership from private landowners and developers who will not build, to communities, local authorities and other accountable bodies who will. Extending democratic and community ownership of land whether by leasehold, trust ownership, or outright purchase is crucial to economic revival, to the effective delivery of house building and community regeneration.

Maynooth

Maynooth is a large economically active town that provides a number of services and facilities for north Kildare and is strategically located on the Dublin- Sligo railway line.

Maynooth is a vibrant university town with a young demographic.

The Draft RSES provides two Regional Policy Objectives for Maynooth [RPO 4.27 and RPO 4.23]. As noted above, RPO 4.23 is a Regional Policy Objective for all Key Towns. Therefore the only Regional Policy Objective for Maynooth is RPO 4.27, which is to:

> "*Support the continued development of Maynooth, coordinated with the delivery of strategic infrastructure including DART expansion to support future population growth and build on synergies with Maynooth University to promote research and economic development opportunities".*

An Taisce submits that this objective is too broad and vague. An overall objective of the RSES is to "support the continued development" of identified areas. The RSES should set out a targeted approach to achieve the sustainable continued development of specific areas.

An Taisce considers that the Regional Policy Objective should be specific percentage based or timetabled targets which are required to achieve the overall objectives.

Bray

Growth in Bray has been modest compared to other similar settlements in the metropolitan area and challenges remain in relation to public transport investment and congestion on the M/N11.

The Draft RSES provides two Regional Policy Objectives for Bray [RPO 4.28 and RPO 4.23].

As noted above, RPO 4.23 is a Regional Policy Objective for all Key Towns. Therefore the only Regional Policy Objective for Bray is RPO 4.28, which is to:

> "*Support the continued development of Bray, including the enhancement of town centre functions, increased employment of the town, linked to the delivery of key infrastructure including Bray-Fassaroe public transport links*".

The Draft RSES introduces a Health Place Audit ("**HPA**") that provides a framework to audit the quality of specific places and enables the assessment of whether or not a specific place has the features that make it an attractive place for business and employment. With regards to RPO 4.28, increased employment of the town is linked to the delivery of key infrastructure including Bray-Fassaroe public transport links. The transport links are not going to be provided in the near future and would not therefore constitute a major infrastructure gap outlined in the HPA, namely:

- *Well-connected urban centre via foot, bicycle and public transport.*
- *Competitive, smart and integrated public transport networks within and between cities and urban areas.* (Appendix C – HPA)

Navan

Navan acts as the county town for Meath and has experienced significant population growth as one of the country's fastest growing large towns between 1996 and 2016.

The Draft RSES provides five Regional Policy Objectives for Navan [RPO 4.29, 4.30, 4.31, 4.32 and RPO 4.23].

Despite Navan's unbalanced population to employment growth, the draft RSES does not provide for specific policies to correct this imbalance. Rather the use of vague objectives to support existing plans is repeated.

Naas

The Draft RSES provides two Regional Policy Objectives for Naas [RPO 4.33, 4.34].

An Taisce supports the proposed Regional Policy Objective for Naas. However, clear and measurable targets are lacking.

Wicklow – Rathnew, Longford and Mullingar

The Draft RSES provides four Regional Policy Objectives for the Wicklow-Rathnew areas [RPO 4.35, 4.36, 4.37, 4.38]

The Draft RSES provides four Regional Policy Objectives for Longford [RPO 4.39, 4.40, 4.41, 4.42]

The Draft RSES provides three Regional Policy Objectives for the Mullingar [RPO 4.43, 4.44, 4.45].

The Regional Policy Objectives support existing objectives in force. There are no measurable targets to promote sustainable economic growth.

Tullamore

The town has a high ratio of jobs to resident workers.

The Draft RSES provides one Regional Policy Objectives for Tullamore [RPO 4.46], which seeks to promote tourism.

It is unclear how this policy objective addresses existing disparities between employment and population in Tullamore.

Portlaoise

The town has experienced significant growth levels in the past 20 years being one of the country's fastest growing towns between 1996 – 2016. Commuting is highly car based in this Key Town.

The town has a high ratio of jobs to resident workers. The Draft RSES provides two Regional Policy Objectives for the Portlaoise [RPO 4.47 and 4.48].

Notwithstanding the stated high car dependency, there is no measured objective to rectify this issue. RPO 4.48 provides a vague objective approach to "*suppor*t" the transition of Portlaoise to a low carbon town centre. No indication as to how this might be achieved is provided.

Graigecullen – Carlow

The Draft RSES provides one Regional Policy Objectives for **Graiguecullen – Carlow** [RPO 4.49]. The objective provides for the established of a UAP to provide a "*coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Carlow to ensure it achieves targeted compact growth of a minimum of 30% and ensure a coordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre* [sic]".

It would appear that a typographical error has been included in the draft RSES as Graiguecullen – Carlow is identified as a Key Town and not a Regional Growth Centre as is stated in RPO 4.49.

In addition to this apparent error, An Taisce submits that the overall phrasing of RPOS 4.49 does not provide any clear guidance as to how the targeted compact growth may be achieved.

An Taisce has already raised concern regarding the timeline for the establishment of UAPs and their statutory footing in the planning system.

3.3 Medium to Large Sized Settlements

Medium to Large Towns are left to be defined by the relevant County Development Plans. The RSES has outlined a description for Medium to Large Towns, which provides the following:

i). "Medium to large sized towns with a moderate level of jobs and services – include sub-county market towns and commuter towns with good transport links and capacity for continued commensurate growth to become more self-sustaining.

ii). Towns with high levels of population growth and a weak employment base which are reliant on other areas for employment and/or services and which require targeted 'catch up' investment to become more self-sustaining".

The Settlement Strategy for Medium to Large Sized Settlements provides the following:

> "*Promote consolidation coupled with targeted investment where required to improve local employment and services, in line with a development strategy to be determined by local authorities to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy".*

3.4 Small Towns and Villages and Rural Areas

Small towns and villages are left to be defined by the relevant County Development Plans.

The RSES has outlined a description for Small Towns and Villages, which provides the following:

> "*Small towns and villages under 5000 population (4000 population in the Outer Region_ and above 1500 with local service and employment function*."

Rural villages are left to be defined by the relevant County Development Plan. The RSES outlines a description for Rural Villages, which provides the following"

> *"Rural villages less than 1,500 and the winder rural region".*

The Settlement Strategy for Small Towns Villages and Rural Areas provides the following

> "*Support the sustainable growth of rural areas by promoting the regeneration and revitilisation of rural towns and villages, coupled with investment where required to support local employment and services and targeted rural housing policies to be determined by local authorities*."

No Regional Policy Objectives have been set out for Small Towns and Villages. The Draft RSES provides that "*the development strategy for these small towns and villages are to be set out in the Core Strategies of County Development Plans, in accordance with the key principles in the draft RSES*".

With regards to Rural Areas, Section 4.8 sets out six Regional Policy Objectives. [RPO 4.50, 4.51, 4.52, 5.53, 4.54, 4.55, 4.56].

RPO 4.51 states: "*In Development Plan policy Local Authorities shall identify small towns and villages that have the potential for serviced sites as an alternative to one-off rural housing*".

The policy objective does not set any target for the level of housing for rural communities to be accommodated in villages and smaller towns through initiatives such as 'serviced sites. Simply requiring the identification of areas that "has the potential" for serviced sites, does very little to guarantee any progress in the development of such initiatives.

The policy should ensure an effective target level of houses for rural communities to be located in villages and smaller towns with walkable access to services through the roll out a serviced-sites initiative to provide a suitable alternative to one-off dwellings Land in serviced settlements, such as small towns and villages, could be purchased either directly by local

authorities or via private initiatives and the required physical infrastructure put in place (e.g. sewers, water, roads, communications etc.).

RPO 4.53 states "*Local Authorities shall manage urban generated growth in Rural Areas Under Strong Urban Influence (i.e. the commuter catchment of Dublin, large towns and centres of employment) and Stronger Rural Areas by ensuring that in these areas the provision of single houses in the open countryside is based on the core consideration of demonstrable economic or social need to live in a rural area, and compliance with statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements.*".

No definition is provided as to what is 'economic need'. The vagueness and lack of definition for 'economic need' may exacerbate the level of one-off housing and further deteriorate the fabric of Irish towns and villages.

The decline that has occurred in many Irish towns has been caused in part by the building of one off houses in the open countryside, which has been seen as a cost effective option for people. However, dispersed housing externalises very significant hidden costs to society at large. If the true costs were accounted for, settlement in isolated locations would be generally unaffordable for households. Dispersal also considerably increases environmental pressures and heightens the vulnerability of rural householder to cost inflation (e.g. transport fuel, carbon taxes and 'septic tank' charges), service withdrawals and infrastructure downgrades (e.g. hospital, ambulance services, roads, schools, post offices). The vagueness and lack of definition for 'economic' need may exacerbate the level of one-off housing and further deteriorate the fabric of Irish towns and villages.

3.5 Existing Plans

S.27 (1) of the Planning and Development Act 2000 (as amended) ("**PDA**") provides that "*A Planning Authority shall ensure, when making a development plan or a local area plan, that the plan is consistent with any regional spatial and economic strategy in force for its area*".

With regards to 'Existing Plans', the Draft RSES considers that development land prioritization measures rather than 'de-zoning' of land where there is a surplus is an appropriate approach. An Taisce does not consider that this should be the preferred approach. There has been a legacy of significant over-zoning in Ireland. The principle of de-zoning and downzoning of land has been established and the planning legislation is very clear that there is no legal or constitutional prohibition on altering or discontinuing the zoning of land.

Section 10(8) of the Planning and Development Act 2000 (as amended) ("**PDA**") provides that there shall be no presumption in law that any land zoned in a particular Development Plan (including a Development Plan which has been varied) shall remain so zoned in any subsequent Development Plan.

Having regard to the variation of existing plans, An Taisce considers that the de-zoning of surplus land is provided for under s.13 (7) of the PDA, which provides that:

*"In making a variation under this section, the members of the authority shall be restricted to considering the proper planning and sustainable development of the area to which the development plan relates, **the statutory obligations of any local authority in the area** and any relevant policies or objectives for the time being of the Government or any Minister of the Government".*

S.13 (14) provides that "*in this section ' statutory obligations ' includes, in relation to a local authority, the obligation to ensure that the development plan is consistent with —*

(a) the national and regional development objectives specified in —
(i) the National Planning Framework, and
(ii) the regional spatial and economic strategy,
and
(b) specific planning policy requirements specified in guidelines under subsection (1) of section 28 ".

Where there is a surplus of land zoned, the CDP would not be consistent with the RSES and there is a statutory provision for appropriate amendments to be made in order for the CDP to be consistent with the plan. An Taisce submits that where there is a surplus supply an appropriate quantum of land must be de-zoned or down zoned in accordance with the provisions of the PDA.

4.0 Economy and Employment

4.1 Sector Specific Response to Climate Change and Addressing National Commitments

Climate change is a global issue that requires global solutions and participation from all countries. Ireland's greenhouse gas emissions per person are cited to be amongst the highest of any country in the world. Planning policy will play a significant role in both mitigating and adapting to Climate Change.

Ireland contributes disproportionately to climate change, having the third highest emissions per capita in the EU. Ireland's higher than average (45%) carbon-intensity per capita is recognised has been recognised at National level in the NPF.

Under the UN Framework Convention on Climate Change ("**UNFCCC**"), Ireland has repeatedly agreed that developed countries need to cut emissions by 25-40% by 2020 (compared to 1990 levels) to help avert dangerous climate change (i.e. staying below a 2°C global temperature increase above pre-industrial). However, the Environmental Protection Agency's ("**EPA**") data has repeatedly shown that Ireland's actual emissions between 1990 and 2020 are projected to increase by between 7% and 10% (and to increase again by 2030). What matters is total emissions of greenhouse gases. It has been recognised in the

Paris Agreement which Ireland has ratified that 2°C is not in fact a "safe" limit, leading to a more ambitious target:

> "*Holding the increase in the global average temperature to well below 2°C above pre-industrial levels and pursuing efforts to limit the temperature increase to 1.5°C above pre-industrial levels, recognizing that this would significantly reduce the risks and impacts of climate change*."

Despite the fact that global ambition has increased and the Government accepts the science of climate change, effective action has consistently not followed.

As well as contributing to dangerous climate change impacts, the predicted costs to Irish taxpayers of failing to meet Ireland's targets are vast. 2016 estimate of exchequer costs of between €230 million and €610 million by 2020 and costs of between €3 billion and €6 billion by 2030.

The recent history of Irish climate change policy is typified by a yawning implementation gap between rhetoric and reality. Mitigating and adapting to climate change poses a fundamental socio-spatial challenge, which requires a radical reorientation of perspectives and rigorous, committed and consistent policy implementation.

The draft RSES continues the trend in recent policy documents in putting forward a vague, simulative policy agenda, which professes to, addresses Ireland's greenhouse gas emissions but, in reality, does little to achieve this.

What is required are purposive, concrete policy provisions based on tangible targets. Instead, the draft RSES is replete with contradictory policy measures. For example, there is a fundamental dissonance between promoting carbon intensive infrastructure, such as airports and motorways, and exempting agriculture from greenhouse gas abatement measures. It is simply inconceivable that Ireland's climate targets can be achieved through the transport and energy sectors without a significant downshift in absolute (not merely per capita) energy demand.

4.1.1 Agri-economy and Agriculture Emissions

Agriculture is both highly exposed to and is a significant contributor of Climate Change.

Current quantity and export driven Irish agriculture targets as set out in Food Harvest 2020 and Food Wise 2025 are in direct conflict with achieving our climate targets and future proofing the agricultural economy.

Agriculture currently accounts for 33% of national emissions and is currently increasing by 2.9% per annum. Current quantity and export driven Irish agricultural targets as set out in Food Harvest 2020 and FoodWise 2025 are in direct conflict with maintaining and enhancing biodiversity, as well as climate mitigation. Food Harvest 2020 was approved without SEA. Food Wise 2025 was subject to SEA, so that if monitoring of agricultural

intensification shows adverse impacts, which is now clearly occurring, corrective action is required.

Food Harvest 2020 has already resulted in huge cattle number increases (750,000 more at end of 2017 as opposed to end of 2011). Such increases are wholly incompatible with greenhouse gas commitments. The current annual cattle herd increase of 6% per annum is being accommodated by the planning system in granting permission for additional animal housing and poor enforcement control of wetland drainage. This is creating renewed water quality pressures in meeting the Nitrates Directive, and the overlapping impact of slurry and fertilizer run off is affecting water quality. (Further detail in Section 4.1.2)

The draft RSES fails to provide clear direction with regards to emission reduction and industry security for this sector. There is an urgent need for definitive mitigation as well as adaptation measures.

Despite agriculture being a major employment source, the draft RSES fails to provide Regional Policy Objectives for this specific sector. Section 6.4 of the RSES deals with specific sectors in the Region. It is stated under the title of Section 6.4 that specific industries include retail, tourism, marine and agriculture. Regional Policy Objectives have been identified for all of these sectors, except agriculture.

"Future Proof and Risk Management" is listed as one the key economic strategies set out in the RSES. An Taisce submits that the RSES fails entirely in future proofing the agri-economy against the effects of climate change. The RSES acknowledges, "*from a climate perspective, business as usual will result in Ireland's failure to meet our national, European and International climate targets*". Notwithstanding this acknowledgement, the RSES fails entirely to move away from our existing model.

Regional Policy Objective 6.31 provides the following: "*Prepare and operate an economic risk management system, with preventative action plans, considering social and environmental factors*".

It is not clear who will be tasked with preparing the plans provided for under Policy Objective 6.31. Considering that "Future Proof and Risk Management" is a key economic strategy of the Draft RSES, the RSES itself should be predicated on risk based analysis.

The only Regional Policy Objective relating to agriculture is set out under RPO 7.26, which provides the following:

> "*Work with Local Authorities and relevant stakeholders, to identify areas of high value agricultural land and to ensure food security in the Region and to promote sustainable farming practices that maintain the quality of the natural environment, protect farm landscapes and support the achievement of climate targets*".

An Taisce does not consider the Regional Policy Objective to be strong enough. Simply providing a policy objective that offers "support" for the achievement of climate targets is ineffective. The RSES needs to provide a policy objective based on risk analysis and

targets to achieve a meaningful model shift in agricultural practices that provides mitigation and adaptation measures.

The draft RSES acknowledges that the main emission sources to the EMRA includes electricity, built environment, the transport sector and agriculture. It is stated "*emissions in the agriculture and built environment sector and projected to increase and the draft RSES will need to address the built environment (mainly residential) sector*". An Taisce submits that the Draft RSES also needs to address the agriculture sector. This sector, as stated previously, is both a major source of employment, is a contributor to and exposed to the impacts of Climate Change. It is not acceptable that the Draft RSES can, on one hand acknowledge the increasing emissions form this sector, yet on the other hand avoids addressing the Climate Impacts of this sector.

The entire lack of policy objectives aimed at reducing agricultural greenhouse gas emissions runs contrary to the achievement of RSO no. 8 and 9 which provides the following:

1. **Build Climate Resilience:** Ensure the long-term management of flood risk and build resilience to increased risks of extreme weather events, changes in sea level and patterns of coastal erosion to protect property, critical infrastructure and food security in the Region.

2. **Support the Transition to Low Carbon and Clean Energy:** Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focused energy system to support the transition to a low carbon economy by 2050.

4.1.2 Agri-economy and our Environment

Regional Policy Objective 6.8 provides the following in relation to agriculture:

> "*Support Local Authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage*".

The Draft RSES provides no indication as to how this Regional Policy Objective will be achieved. 'Sustainable intensification' runs a high risk of water quality degradation and loss of biodiversity. Current trends suggest agricultural intensification is contributing to deterioration in both. The risk analysis referred to in the Draft RSES should address agriculture from these perspectives.

The most recent data presented by the Department of Agriculture, Food & the Marine at the EPA National Water Forum in June 2017 revealed that 12% of farms with a derogation are failing to comply and of the remaining 130,000 the failure rate is 30%. This challenges

Government and industry claims on the sustainability of Irish agriculture concluding that "Overall, Irish agriculture in its current form is damaging to climate, water quality and biodiversity" and is not contributing to global food security.

It concludes, "*Agricultural intensification has caused significant negative impacts to Irish biodiversity". It cites the impact of agricultural intensification or inappropriate afforestation causing the "bad" conservation status of a wide range of internationally important Irish habitats, the decline of ten key farmland birds and that "One third of Irish wild bees are under threat of extinction*". It also highlights the need for the large expansion of area based high nature upland farming.

The coalition of Irish development NGOs forming "Stop Climate Chaos" and The Environmental Pillar both of which include An Taisce have published a report "Not So Green: Debunking the Myths around Irish Agriculture" in 2016.

According to the EPAs Water Quality in Ireland Report 2010-2012 (2015), 47% of rivers, 58% of lakes and 55% of transitional water were not of good status for the period 2010-2012. The two most important suspected causes of pollution in rivers are agriculture and municipal sources, accounting for 53% and 34% of cases respectively. There was for example also a 5% reduction in satisfactory quality lakes (10 lakes) compared to 2007-2009 (EPA, 2015).

Agriculture is also one of the main land uses in high status catchments and is as a result one of the most important pressures and threats on these extremely sensitive waterbodies. The percentage number of high quality sites had almost halved in the 22 years between 1987 and 2012 (EPA, 2015). Only 11.5% of rivers, 9% of lakes and 3.6% of transitional waters were considered to be of high status for the 2010-2012 period (EPA, 2015). The smallest pressure can impact on high status. Small increases in the amount of P and N (Nitrogen) can damage the sensitive ecology associated with these sites (Ní Chatháin et., 2012). Identified pressures include land-use changes associated with agriculture such as field drainage and fertilisation, animal access to waters, and sheep dip pesticides (Ní Chatháin et., 2012). Livestock manures and slurries, and access to watercourses by cattle and sheep, can lead to significant losses of bacteria, viruses and protozoa to drinking, bathing and shellfish waters. This can affect the amenity value of the water environment and pose a risk to human health (Mawdsley et al., 1995; SEPA, 2007).

Plants, soil and ultimately watercourses that may subsequently be used as catchments for public water supplies may all be affected. (Mawdsley et al., 1995; SEPA, 2007). The on-going intensification of agriculture in areas with high status water bodies is a major concern and has not been adequately addressed as part of the RSES.

The Draft RSES does not provide clear measured targets that are required to achieve a model shift in this sector. The Draft RSES accommodates the continuation of current trends, which undermines the achievement of RSO no. 7 and 11.

RSO 7: "***Sustainable Management of Water, Waste and other environmental resources**: Conserve and enhance our water resources to ensure clean*

water supply, adequate waste water treatment and greater resource efficiency to realise the benefits of the circular economy".

RSO 11: "***Biodiversity and Natural Heritage:*** *Promote coordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscapeand heritage protection*."

The Draft RSES requires timetabled and measurable actions at regional level to integrate food production and processing with measures to enhance cultivation and diversity of plant-based food and local food production networks, and reduce production of animal agriculture

Regional agriculture, forestry, and rural development policy needs to support the effective, timetabled actions to move habitats and species with current bad and unfavourable status to favourable. This would include controls on bovine agriculture through the planning system.

4.2 The Digital Economy

"Align to national strategy and approach for data centres – right location for use and energy demand" is listed as a guiding principle for investment prioritisation I placemaking for enterprise development.

This guiding principle does not address analysis from EirGrid which shows that data centres already connected to the grid consume 250MW of electricity, sufficient to power more than 210,000 homes. Already permitted data centre development means that another 550MW is due to be connected over the coming years, enough for almost 470,000 houses, while projects under discussion could consume as much as 1,000MW - enough for 850,000 homes.

The Eirgrid ten-year transmission forecast statement published in October 2017 states, "If all of these enquiries were to connect, the data centre load could account for 20pc of all-island peak demand," and "Clearly the potential connection of demand on this scale is equivalent to decades of national demand growth". The level of proposed connections is highest in north Dublin, where there is "limited additional network capacity" available to meet demand.

Current climate mitigation electricity generation targets are based on achieving a renewable percentage of total generation. The net benefit of this is undermined if an increase in electricity demand is allowed to occur without corresponding increase in renewable generating capacity.

A requirement for any new data centre development to be directly linked to the provision of new equivalent total renewable additional renewable energy capacity to the grid, in order to avoid dilution of current net tonnage reduction of climate emissions should form part of the RSES.

5.0 Environment

5.1 Integrated Land and Marine Planning

Ireland, as one of Europe's leading maritime countries and with a marine jurisdiction ten times the land area, should be setting an exemplary standard in the implementation of the Marine Strategy Framework Directive.

Ireland has a legal obligation under EU law to provide an effective and compliant strategy to (i) meet the obligations of the Marine Strategy Framework Directive (MSFD), (ii) to maintain the Good Environmental Status of the marine ecosystem, (iii) to apply the precautionary and polluter pay principles in achieving this, and (iv) to set out environmental targets and indicators to achieve and maintain the Good Environmental status of the marine environment by 2020.

This should be a key part of Ireland's wider role in promoting action on the overriding threats to the global marine environment through climate change, ocean warming, ocean acidification, overfishing, marine litter waste and pollution, both through national initiative, through membership of the EU and taking a proactive role in the UN IPCC process, OSPAR, ESOO and other international structures.

Major leadership is required to reduce carbon emissions in order to reverse ocean acidification as much as climate warming. The most recent UN data highlights the converging impact on anthropogenic greenhouse gas on increasing ocean temperatures, and the inability of the ocean to absorb additional CO2, causing acidification and the accelerated damage to the marine ecosystem. The restoration of fish stocks is also key to restore declining populations of internationally important breeding colonies of birds around our coasts.

There is a major opportunity for Ireland to take up one of the key provision of the MSFD in the designation of Marine Protected Areas. These protected sites should have site-specific management plans, which protect marine ecosystems from unsustainable practices. Public participation should be promoted so that Marine Protected Areas can provide alternative forms of income for coastal communities as well as helping to restore depleted fish stocks.

Regional Policy Objective RPO 7.1 and RPO 7.2 relates to integrated land and marine planning. The Regional Policy Objective provide the following:

RPO 7.1: *To ensure consistency and alignment between the upcoming National Maritime Spatial Plan (due in 2021) and regional approaches to marine spatial planning and to integrate the Marine Strategy Framework Directive and Marine Spatial Planning implementation into future land use plans in the Region in recognition of the opportunity to harness Ireland's ocean potential.*

RPO 7.2: *To achieve and maintain 'Good Environmental Status' for marine waters and to ensure the sustainable use of shared marine resources in the Region, and to promote the development of a cross-boundary and cross-border strategic management and stakeholder engagement framework to protect the marine environment.*

A strong divide between marine and terrestrial planning frameworks still exists in coastal planning and management. The Draft RSES provides that "*further stakeholder engagement and integration of marine and territorial plans over the lifetime of the Draft RSES*" may be offered as a result of regional maritime spatial plans, which "*may be required*".

No certainty is provided with regards to the marine economy and the conservation of a marine environment. The Regional Policy Objectives are predicated on continued growth of fisheries and aquaculture. The Draft RSES fails entirely in identifying any risk-based analysis for the continued growth of the Marine economy and subsequent mitigation and adaptation measures for this industry.

RSO 7: "***Sustainable Management of Water, Waste and other environmental resources****: Conserve and enhance our water resources to ensure clean water supply, adequate waste water treatment and greater resource efficiency to realise the benefits of the circular economy*".

RSO 11: "***Biodiversity and Natural Heritage:*** *Promote coordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscapeand heritage protection*."

In order to achieve RSO no. 7 and RSO no. 11, there is a need to apply an effective timetable for achievement of standards and targets in Water Framework Directive, Waste Framework Directive, Air Quality Directive, Nitrates Directive and Marine Strategy Framework Directive.

The protection and enhancement of the marine ecosystem needs to form the basis of all development and policy interfacing with the marine area.

5.2 Water Quality

In August 2017, the EPA revealed that no effective progress has been made in meeting EU Water Framework Directive (WFD) targets to improve the quality of Irish rivers, lakes and estuaries.

Ireland failed to meet the overall 13% improvement proposed for the 2010 -2015 period and there is little change in water bodies in an unhealthy state: at 43% from 45% for Irish rivers,

the 54% figure for lakes unchanged, and estuaries marginally unchanged to 69% from 70%. The report also reveals increases in fish kills in 2013-15 in comparison to previous periods.

After agriculture, wastewater discharges to water from human settlements, including towns, villages and rural houses was the biggest source of water pollution.

Of particular relevance to the Draft RSES is the impact of increased cattle housing to accommodate a 6% annual increase in the dairy herd since the lifting of milk quotas and the extent of deficient sewerage infrastructure with 44 urban wastewater discharges linked with a high degree of probability to river pollution and raw sewage still being discharged into the water environment of 44 municipal areas. Section 4.1.2 has already addressed our concerns relating to the Draft RSES approach to agriculture impacts on the environment

Municipal sources of pollution accounted for 28% of the river and canal sites with slight pollution.

The majority of these cases were due to suspected nutrient losses from municipal wastewater treatment plants. Municipal wastewater accounted for 39% of the moderate pollution in our rivers and canals. Municipal wastewater treatment plants are the suspected cause of pollution for eight of the 13 seriously polluted river sites (bad ecological status). Serious pollution resulting from urban wastewater and industrial pollution was reduced to 17 km of river channel length. This was down from 53 km in 2009. Urban wastewater treatment (UWT) also accounted for 4.9% of N and 28.7% of P in the marine environment (EPA, 2015). Wastewater discharges, emergency discharges from storm water outfalls, and drainage from domestic wastewater systems are the greatest issue for bathing water quality in Ireland. In 2014 there were 27 incidents related to sewage pollution (EPA, 2015).

Wastewater discharges were considered a contributing factor to the poor classification of all 7 of the 136 EU identified bathing waters which failed to comply with minimum water quality standards and were classified as ‘poor’ in 2014. These pollution incidences have serious impacts on the environment, human health and tourism.

The An Taisce submission on the Draft River Basin Management Plan in August 2017 concludes that it evades effective action in all areas affecting water management in meeting of WFD “Good Water Status” targets, in favour of continuing avoidance of effective regulation of forestry, peat extraction, water abstraction, aquaculture and other activity.

Regional Policy Objective 7.10 and 7.11 relate to Water Quality and provide the following:

RPO 7.10 “*Support the implementation of the Water Framework Directive in achieving and maintaining at least good environmental status for all water bodies in the Region and to ensure alignment between the core objectives of the Water Framework Directive and other relevant Directives, River Basin Management plans and Local Authority Development Plans.*”

RPO 7.11 "*Local Authorities shall incorporate into the development of local planning policy and decision making any measures for the continued protection of areas with high ecological status in the Region and for mitigation of threats to waterbodies identified as 'At Risk' as part of a catchment-based approach in consultation with the relevant agencies. This shall include recognition of the need to deliver efficient wastewater facilities with sufficient capacity and thus contribute to improved water quality in the Region.*'

Point sources of pollution need to be eliminated. The elimination of all raw sewage discharges needs to happen as soon as possible. The discharge of poorly treated sewage is also not acceptable and needs to be addressed. All wastewater infrastructure must be in compliance with the requirements of the Urban Waste Water Treatment Directive and wastewater discharge authorisations.

Sensitive areas as defined by the Urban Waste Water Treatment (Amendment) Regulations as waters that are eutrophic or may become eutrophic unless protected. The emphasis on eutrophic status is too narrow and is indicative of the fixation on the achievement of "good status". A broader environmental perspective must be considered when the need for investment is being made.

The need to protect high status sites and designated aquatic habitats must be considered. Priority should also be given to waters designated under the Habitats and Birds Directives. Top priority should be given to eliminating point source discharges and wastewater discharges from important freshwater pearl mussels, Atlantic salmon and shellfish waters.

Link to An Taisce submission and recommendations to Dept. Housing, Planning, Community and Local Government on the River Basin Management Plan 2018-2021

The RSES needs to set out a requirement that provides for the quantum of zoned land to be carefully matched and phased with the existing and/or planned Population Equivalent capacity of the local waste water treatment plan. Where there is no commitment in the Water Services Investment to fund additional wastewater treatment capacity, surplus zoned land should be dezoned in accordance with the sequential approach. Appropriate wastewater treatment infrastructure must be put in place in tandem with new development, and any new development without simultaneous provision of such infrastructure should be considered premature.

As with other Policy Objectives, there is a lack of target and timelines. The National Planning Framework provides the following targets in for waste water: "Increased compliance with the requirements of the Urban Waste Water Directive from 39% today to 90% by the end of 2021, 99% by 2017 and 100% 2040." The Draft RSES fails to identify how these targets will be achieved in the coming years.

Section 3.4 of this submission raised concern regarding the policy approach to one off housing in rural areas and highlighted associated environment pressure and vulnerability for households relating to one off housing. In relation to its impacts on water quality specifically, most of the soil conditions throughout Ireland are unsuitable to accommodate

private on-site wastewater disposal. This legacy of inappropriate development will be a significant challenge for the achievement of our binding Water Framework Directive targets.

In order to achieve RSO no. 7 and RSO no. 11, there is a need to apply an effective timetable for achievement of standards and targets in Water Framework Directive, Waste Framework Directive, Air Quality Directive, Nitrates Directive and Marine Strategy Framework Directive.

5.3 Peatlands

Nationally peatlands comprise 20% of the Irish land area and 75% or organic soil carbon. In the EMRA the peatland areas are concentrated on the Wicklow uplands, which include extensive areas of wet and dry heath and the peatlands area of Co. Kildare, Co. Longford, Co. Westmeath, Co. Offaly and Co. Laois where extensive industrial scale extraction has occurred. While there is a national peatlands strategy in place this is not integrated with the level of timetabled targets required to restore the peatlands both nationally and regionally as carbon sinks in accordance with the scientific recommendations of the EPA Bogland - Sustainable Management of Ireland's Peatlands Report 2011.

If the RSES is to achieve a sustainable land use and economic strategy for the region, targeted and timetabled actions on peatland management are required with exist dates for burning of peat for power generation or domestic fuel and use of peat for horticulture and animal housing bedding.

6.0 Connectivity

Chapter 8 of the EMRA Draft RSES sets out Regional Policy Objectives for Connectivity.

No reference is given to the range of 2020 targets set out in 2009 Department of Transport Smarter Travel target that:

"*The total kilometres travelled by the car fleet in 2020 will not increase significantly from current total car kilometres*"

and;

"Work related commuting by car will be reduced for a current modal share of 65% to 45% "

The provisions for investment in public transport and cycling route enhancement are not linked to any targets.

It is essential that places are seen as attractive places for both business and people to locate. The World Health Organisation (WHO) have outlined that the use of 'passive' modes of transport is associated with increased inactivity levels as well as poor air quality, traffic

congestion, lack of adequate walking and cycling infrastructure and social infrastructure (including sports and recreation facilities).

All of the above can result in a poor quality of life for citizens and be a deterrent for investment in our cities. It is therefore essential that an integrated approach to land use and transport policies in our cities is adopted to allow the efficient movement of people and goods, improve the viability of public transport, the provision of safe cycling routes, and citizens' quality of life. The most realistic and cost effective pathway to radically reducing emissions from the transport sector in our metropolitan areas is via investment in public transport and the creation of attendant public transport friendly, compact places.

The draft RSES needs to include targets on the percentage of new housing and employment locations, which will meet smart growth criteria including for public transport accessibility within existing or expanding urban areas. All new housing and employment development should be within 15 mins walking distance of basic public services.

An integrated approach to land use and transport policies in our cities is critical to allow the efficient movement of people and goods and to improve the viability of public transport.

It is important that land use planning underpins the efficiency of public transport services. There are essentially two inter-related ways which this can be achieved:

1. By locating trip origin and trip destinations near public transport routes; and
2. By ensuring that new developments are served by public transport services.

All new housing and employment development should be within 10/15 minutes walking distance of basic public services. The RSES needs to adopt targets for the major percentage of new housing and employment locations to be located with walkable access to public transport and safe cycling and walking routes.

An Taisce acknowledge the support of draft RSES for the '10 minute' settlement concept. This concept is provided for under "Guiding Principles for Integration of Land Use and Transport". In order to strengthen the effectiveness of this concept, An Taisce recommend its inclusion as a Regional Policy Objective.

RSO no. 6 provides the following:

RSO 6: ***Integrated Transport and Land Use:*** *Promote best use of Transport Infrastructure, existing and planned, and promote sustainable and active modes of travel to ensure the proper integration of transportation and land use planning.*

In order to reverse the EMRA car dependency and achieve RSO 6, An Taisce recommends the draft RSES to implement the following:

1. **Effective targets for the decarbonisation of transport to prioritise increased shift to walking, cycling and clean sustainable public transport through rebalanced investment and incentives away from road infrastructure.**

2. **Effective targets for new development in accordance with "Smart Growth" objectives to ensure that the major percentage of new housing and employment locations be located with walkable access to public transport and safe cycling and walking routes.**
3. **Reiteration of 2009 Smarter Travel objective that the total kilometres travelled by the car fleet in 2020 will not increase significantly from 2009 total car kilometres.**
4. **Timetabled targets to meet and increase the national modal share in to 65% non-car based workplace travel within optimum timeframe, with higher targets for the five Metropolitan areas.**
5. **Meeting of National Cycling Framework 2020 targets that 10% of journeys be made by bicycle. Cycling route and safety enhancement to be provided for urban and village areas generally and not limited to the 5 Metropolitan areas.**
6. **Investment in public transport and cycling infrastructure to be complimented by road and car parking pricing measures, including for urban edge retail, to incentivise modal shift.**

6.1 Decarbonising Transport

RPO 7.31 provides: "*Local Authorities shall include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including measure for more recharging facilities and prioritisation of parking for EVs in central locations*."

It should also be recognised that while the rapid decarbonisation of the transport fleet is a climate action imperative, electric and other vehicles still have a major resource consumption impact and continue to emit particle pollutants through brake fluid and tyre wear.

Meeting of sustainability targets requires reduction of current level of car uses and dependence, to curtail sprawl, congestion, inefficient resource use and unhealthy lifestyles.

7.0 Quality of Life

The Key principle of healthy placemaking is the driver for this chapter to deliver on a number of the Regional Strategic Outcomes on compact growth, regeneration, integrated transport and landuse, rural development, human health and creative places. (RSO no. 1,2,3,4,5 and 6)

The current trend of development in Ireland contradicts the goals of sustainable development and cannot continue. Several strategies and guidelines have come before the NPF and the RSES which outline visions, objectives and actions to reduce sprawl, decrease car dependency, integrate development with public transport, make areas more 'cycle and pedestrian friendly' and improve the quality of life for all.

These previous strategies have failed in achieving their aspirational vision. The draft RSES lacks any clear targets and timelines to reduce Ireland's on-going unsustainable development pattern and our resultant unhealthy commuter behaviours which have a direct impact on our health and wellbeing in a number of ways

No targets are provided on the percentage of new housing and employment locations, which will meet smart growth criteria including:

1. For public transport accessibility within existing or expanding existing urban areas; and
2. For providing serviced sites in villages as an alternative to rural one off housing

In order for the RSO to be achieved, An Taisce recommends the draft RSES to implement the following:

1. **All new housing and employment development should be within 15 mins walking distance of basic public services**
2. **Adopt national targets for the major percentage of new housing and employment locations to be located with walkable access to public transport and safe cycling and walking routes.**
3. **Update and expand Department of Transport 2009 "Smarter Travel" targets for predominant non-individual car based mobility for employment, school and services access.**
4. **Provide direct provision of access to public infrastructure and services only to development meeting smart growth location standards.**
5. **Restrict road access to further ribbon development housing outside town and village speed limits. Restrict public service connection generally to development not meeting "smart growth" location standards.**

There is no reiteration of the well formulated though not implemented provision of the 2002 National Spatial Strategy for the six local service test requirements for new housing in Box 5.2 While a range of well stated principles are set out in the RPOs for Chapter 9 these are not properly stated as mandatory requirements for new housing development.

Box 5.2

Housing Location in Urban Areas	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?

8.0 Monitoring and Implementation

8.1 Monitoring

Effective monitoring by the Regional Authority is required in the implementation of the RSES to cover: climate emissions; carbon soil management, including peatlands; biodiversity data; air quality, including ammonia; water quality, including nitrates; transport generation and congestion; modal share between different transport modes; spatial planning data to measure sprawl development and location of population change; evaluation of impacts on landscape archaeology and architectural heritage; and other considerations.

8.2 Implementation

Community engagement in the implementation of the Strategy and SEA mitigation and monitoring measures is critical with the Public Participation Network (PPN) requiring the information provision, support, and resourcing for this.

The lessons learned from the failed National Spatial Strategy Ireland 2002 must be addressed. This is contained in Section 5.2 on a series of location tests required for new residential developments, including access to services. This was not complied with or implemented at local level in individual decisions.

The 2002 NSS predated the introduction of the SEA Directive. With the RSES process now subject to SEA, there is a legal onus to identify, mitigate, and monitor environmental impacts and take remedial action if adverse impacts arise.

8.3 Remedial Action

There is a collective responsibility by the three Regional Authorities and on individual local authorities to achieve effective co-ordination in the achievement of the key National Planning Framework regional population targets and objectives to focus development in the four regional cities.

The onus is on the Regional Authority to ensure that individual local authorities do not undermine either the NPF overall spatial planning targets or the mitigation measures required under the SEA process. If in the event of:

1. The RSES failing to meet the obligations of the SEA Directive in mitigating adverse environmental impacts or;
2. Monitoring of the implementation of the RSES showing adverse impacts e.g. increase in traffic generation and congestion and corrective action is not taken by the Regional Authority,

the Regional Authority would be exposed to legal action under the SEA Directive.