

20190208-NWRA-RSES

RSES Submissions',
NWRA,
The Square,
Ballaghaderreen,
Co. Roscommon.
F45 W674

Sent by email to:
rses@emra.ie

08.02.19

Re: Draft Consultation, Northern and Western 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 Northern and Western Region.

Yours faithfully,

Doireann Ni Cheallaigh

Planning Officer
An Taisce – The National Trust for Ireland

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An Taisce – The National Trust for Ireland | Tailors' Hall, Back Lane, Dublin, D08 X2A3, Ireland | www.antaisce.org +353 1 454 1786 | info@antaisce.org

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Directors: Dr. Muiris O'Ceidigh (Secretary), Philip Kearney, Christopher Massi, Patricia Oliver, Judy Osborne (British), John Pierce (Chair), Garrett Poynton, Charles Stanley-Smith (British), John Sweeney, Rahim O'Neill

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1.0 Introduction

The Northern and Western 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 and ensuring that 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 city, 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 Northern and Western Region.

2.0 Strategic Vision and Growth Strategy

The Draft RSES has set out 'Five Growth Ambitions' including:

1. **Vibrant Ambition** – *“The NWRA believes that strong economic growth, which creates permanent, sustainable jobs, is best achieved by building a competitive and productive economy. Focusing policies on scale, investing in connectivity and our people whilst aggressively pursuing a low carbon approach to enhance our differentiation.”*
2. **Natural Ambition** – *“It has been identified that more strategic actions are required to prepare the region for what is to come, and highlights the need to create a combined long term vision for the future of both energy supply and our ability to generate renewable energy. In order to address our energy requirements our RSES emphasises the need for co-ordination, new thinking, investment and skills to implement change. All considerations need to be cognisant of our natural resources, landscape and heritage (natural, social & cultural).”*
3. **Connected Ambition** – *“Accessibility and mobility within the region has a direct effect on the region’s economic competitiveness. It also has an effect on the attractiveness of the region as a favourable living and visiting environment. The RSES will support further investment in sustainable transport measures. In addition, to achieve our Vision for the region we need to strengthen our digital network and enable new technologies to work by ensuring that policies and systems are in place that can help people transition to a world much more digitally connected.”*
4. **Inclusive Ambition** – *“One of the strongest foundations and emerging propositions this region has to build on is its ‘liveability’. The Region aspires to being one of the most liveable places in Europe with a commitment to sustainable and inclusive growth.”*
5. **Infrastructure Ambition** – *“Provision and maintenance of economic infrastructure, such as energy, water, and wastewater, are key to delivering compact growth and a connected, vibrant, inclusive, resilient and smart region.”*

There does not appear to be any overall Regional Strategic Outcomes necessary to establish targeted Regional Policy Objectives.

3.0 People and Place

Chapter 3 [People and Places] sets out a Settlement Hierarchy and the identification of key growth areas in the Region. Regional Policy Objectives no. 9-23 are set out in this chapter. 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.

3.1 Regional Growth Centres

Letterkenny, Sligo and Athlone have been identified as ‘Regional Growth Centres’.

Letterkenny

The Metropolitan Area region is defined by the spatial influences of Letterkenny-Derry~Londonderry-Strabane. Letterkenny is the largest town in Co. Donegal with a population of 19,274.

Section 2.0 of the RCSP for Letterkenny provides that *“under the new operational structures established to support the growth of the emerging North West City Region, both Donegal County Council and Derry City and Strabane District Council are assigning a strong emphasis on the establishment of place-based collaboration and leadership for regional development and growth”*.

The RCSP is based on four key strategic outcomes:

1. Building Inclusive and Compact Places;
2. Investing in Connected and Accessible Places;
3. Planning for a Vibrant Economy and Nurturing Communities; and
4. Creating Resilient Places and Low- Carbon Infrastructure

Policy 4.2 of the RCSP provides for “*accommodating growth and delivering housing*”. The vision is to accommodate future growth and deliver housing in the North West City Region and the regional centre of Letterkenny through:

- i). Supplying quality housing that promotes sustainable compact growth in existing towns and villages where housing opportunities are close to schools, community facilities, health facilities, shopping, and employment;
- ii). Prioritising the (re-)use of existing under utilised land and buildings, and other infill opportunities, across the region to stimulate compact growth and for leveraging density in urban locations for sustaining, and growing, infrastructure and supporting amenities;
- iii). Ensuring existing and future housing has good access to a range of quality education, childcare and health services for all as a means of improving the quality of life for existing residents and attracting new enterprises and a skilled workforce who seek high quality services in making locational decisions;
- iv). Developing appropriate and collectible indicators to monitor and assess National Policy Objective 3c, ensuring at least 30% of new homes are delivered within existing built- up towns and villages (excluding Letterkenny);
- v). Proposing that 40% of new homes are delivered within the existing built-up footprint of Letterkenny, achieving compact, smart and sustainable growth in this regional centre;
- vi). Providing for lifetime adaptable homes that accommodate the changing needs of households over time;
- vii). Accommodating urban growth that creates more active lifestyles through more walkable and cycling friendly environment, offering better connected and walkable neighborhoods, and which links to sustainable mobility networks across the wider region, including cross-border networks (see Figure 5.1);
- viii). Considering the valuable role housing can have in genuinely creating inclusive communities and growth in Letterkenny, as a regional centre that better responds to changing demographic needs.

Section 4.3 provides for policies on accessing quality services. With regards to transport that following is stated:

“Prioritising investment in transport infrastructure recognising the important role of bus services, as the principal public transport mode, and cycling in Letterkenny, and across the city region in order to improve connectivity;”

An Taisce notes the further detail under policy 5.1 The above policy (section 4.3) is repeated in section 5.1. An Taisce submits that priority should be given to investment in “**public transport**” in line with ensuring compact growth, therefore providing the critical mass adequate for public transport infrastructure. The policy provides for the “**recognition**

in the importance of public transport and cycling”, notwithstanding this ‘recognition’, the RSCP lacks clear investment paths or strategies as to how public transport will be given priority status, therefore undermining the achievement of strategic outcome no.4 (“**Creating Resilient Places and Low- Carbon Infrastructure**”).

An Taisce notes Policy 5.2 “*encouraging active travel*” and supports policy no. 6 and 7 set out under this section. Notwithstanding the provisions of policy no. 6 and 7, the RCSP should set out measurable targets as to when safe and connected pedestrian and cycle pathways and routes within Letterkenny will be achieved.

Large-scale residential and economic development sites should be able to demonstrate how they will be incorporated into public transport routes and easily accessed by walking and cycling paths. This level of infrastructure is necessary in order to encourage more active modes of travel and use of public transport, therefore contributing to a modal shift.

Section 7 sets out policies for creating resilient places and low-carbon infrastructure. Considering Ireland’s increasing GHG emissions and our legally binding targets, it is vital that policies relating to low carbon infrastructure are targeted, clear, unambiguous and can be measured.

With regards to low carbon infrastructure for the North West Metropolitan Area and Letterkenny, policy no. 3 and 4 (North West Metropolitan Area) and no. 5 – 7 (Letterkenny) under section 7.2 provides the following:

3. *Contributing to the EU and national goal of reducing greenhouse gas emissions;*
4. *Pursuing the generation of renewable energies and their local applications through, for example, green infrastructure planning, innovative design solutions, the promotion of energy efficient buildings and homes, designation of ‘Eco-Quarters’, etc.;*
5. *Supporting Letterkenny’s transition to a low carbon economy, including through enterprise and community-led initiatives such as District Heating Schemes/heating schemes with zero local emissions, urban farms, etc.;*
6. *Implementing green adaptation measures to support better management of the urban micro-climate and contributing to greenhouse gas emission reductions;*
7. *Developing comprehensive traffic management solutions for Letterkenny incl. improving the pedestrian environment and public realm, and promoting a shift to active travel modes.*

While all of these are a positive and necessary approach to decreasing our emissions and shifting away from fossil fuel, An Taisce submits that the policies do not go far enough in setting out clear and measurable targets for the establishment of a low carbon society.

Sligo

The policy objectives set out for Sligo are predominantly focused on economic growth and employment. Little detail and consideration has been given to future population growth and the required infrastructure, both social and physical, to accommodate both economic and population growth.

Athlone

The parts of Athlone within the Northern and Western region include Monksland and Bealnamulia. It is noted that a population target of 30,000 for Athlone has been set in the Draft RSES for Eastern and Midland Regional Assembly (“EMRA”). It is proposed that the division of this figure will be determined as part of a joint Urban Area Plan (“UAP”) to be made by Roscommon and Westmeath County Council, and generally be in proportion to existing populations.

It is envisaged that the UAP will be used to identify a boundary for Athlone and identify strategic residential and employment areas

With regards to the UAP there does not appear to be an allocated timeframe for the establishment and delivery of the UAP nor is it clear if the UAP 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 set out by the Northern and Western Regional Assembly for Athlone does 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.

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

The Draft RSES has defined Ballina, Castlebar, Cavan Ballinasloe, Carrick-on-Shannon, Monaghan, Roscommon and Tuam as ‘Key Towns’.

No Regional Policy Objectives have been set out for Key Towns, rather a list of ‘Key Future Priorities’ have been established for each area.

Ballina

10 'Key Future Priorities' have been set out for Ballina, the majority of which seek to support existing objectives for the area.

It is noted that a 'Key Future Priority' is for the *'upgrade of the N26/N58 linking Ballina and the north- west of the county to the N5'*. An Taisce submits that investment should be directed into public transport, pedestrian and cycling infrastructure, therefore contributing to a modal shift and enhancing livability.

The 'Key Future Priorities' are predominantly focused on further growth with little attention given to infrastructure capacity and coordinated growth.

The vast majority of the Priorities are phrased in too vague, non-committal language to "support" or "promote" particular development. Clear and measurable targets are lacking.

Ballinasloe

10 'Key Future Priorities' have been set out for Ballinasloe. An Taisce considers the 10 priorities to be positive, particularly in relation to the promotion of the town's heritage as an important Market town and supporting the future delivery of a regularized outdoor market/farmer's market at suitable locations.

An Taisce considers that the priorities set out for Ballinasloe could be strengthened through the establishment of timetabled measures to ensure the delivery of priorities.

Castlebar

Castlebar is the county town of Mayo with a population of 12,100(CSO 2016) and it is the principal retail town in Mayo. Nine 'Key Future Priorities' have been set out for Castlebar.

Future Priority no.1 appears to be a statement rather than a future priority, stating: *"It's strong administrative function with the Mayo County Council head office, Department of Agriculture, etc"*.

With regards to 'Future Priorities' 2-9, An Taisce submits that these are predominantly focused on further growth with little attention given to infrastructure capacity and coordinated growth.

'Future Priority' no 9 states: *"Pursue upgrading of the entirety of the N5 to a Ten-T 'High Quality Road' and the upgrade of the N60 from Castlebar to Claremorris (critical link to the*

N17(AEC))". An Taisce submits that no priority has been given into public transport/walking and cycling infrastructure.

Cavan

10 'Key Future Priorities' have been set out for Cavan. The first priority is to "*Build upon its excellent Jobs to Resident Workers ratio of 1.388, clearly demonstrating the important regional function that Cavan Town performs*". Little detail has been provided as to how this growth will be carried out and the provision of infrastructure required to enable the growth.

Key priorities 2-10 are too broad and vague, seeking to "support" or "promote" priorities in the Key Town.

Carrick-on-Shannon

11 'Key Future Priorities' have been established for Carrick-on-Shannon, the majority of which focus on the future economic growth of the area.

Key Priority no. six seeks to pursue the development of an opportunity site for data centre use (or an alternative low density employment use). An Taisce does not oppose the development of the site, however, we submit that any proposal for energy-intensive development, such as data centres requires the most energy efficient data storage.

As the IDA is promoting Ireland as a global centre for data storage, Ireland needs to set international leadership in energy efficiency through the use of zero-carbon energy. The annual growth in the storage of electronic data is a major global climate and resource consumption issue. The net emission reduction benefit of Ireland's 2020 target of 40% renewable electricity generation is being undermined by rising energy demand, as the effectiveness of a percentage based target is diminished by rising consumption, including the increasing development of Data Centres. Data storage development proposals in Ireland need to be based on appropriate considerations of the direct and indirect effects of the development on energy demand and therefore on climate. Mitigation is required of the climate emissions arising from the electricity use required by a proposed data centre to meet the objectives of the Climate and Low Carbon Development Act 2015 which incorporates the principle of "Climate Justice", The Department of Environment, Community and Local Government Planning Policy Statement 2015 and the equitable per capita carbon budget for a development country.

The sustainability of any new energy demand development can only be achieved, either by direct renewable power source generation on site or off site with dedicated grid connection, or a dedicated renewable addition to the grid to at least the level of the total annual generating capacity required by the development.

Key priority no. 10 "Seek to alleviate traffic congestion in the town centre". An Taisce submits that this priority is too vague. No meaningful objective is provided as to how this

might be achieved. Rather, Key priority no. 11 supports the development of the N4 at Carrick-on-Shannon to a high quality road. In order to alleviate traffic congestion, investment needs to be directed into infrastructure that provides for alternative means of travel and move away from a car dependent society.

Monaghan

Five 'Key Future Priorities' have been established for Monaghan. The Future Priorities predominantly focus on the economic growth of Co. Monaghan. Future Priority no. 4 seeks to provide future population growth within Monaghan to be targeted at delivery of compact growth. While An Taisce supports the measure of compact growth, we submit that this priority is not based on any specific measurable targets.

The 'Key Future Priorities' seeks to provide for continued economic growth of Monaghan with no consideration/priority given to infrastructure deficits.

Roscommon

Seven Key Future Priorities' have been established for Roscommon, the majority of which focus on economic growth with little consideration given to potential infrastructure deficits.

Key Priority no. 4 provides for the "*upgrading of the N61 national route between the Regional Centre of Athlone and Boyle Town*" and "*potential improvements in public transport linkages*". An Taisce submits that the provision of public transport and active transport infrastructure should be a priority. In this instance, it appears that the provision of alternative travel is not a priority, rather an after thought. The Future Priority gives precedence to car-based infrastructure, which can result in induced demand and negates any meaningful modal shift.

Tuam

Seven Key Future Priorities' have been established for Tuam. An Taisce submits that these seven priorities provides for a more sustainable approach than the other 'Key Towns' in the RSES. Notwithstanding this, An Taisce submits that the priorities could be strengthened. For example, Key Priority no. 4 seeks to "*Address deficiencies in the existing pedestrian/cycling network, promoting walking/cycling and broader Smarter Travel initiatives, along with reducing car dependency, are other key considerations*". In order to achieve a modal shift and implement the objectives of Smarter Travel, clear measurable targets should be provided with a timetable for implementation. These RSES should provide timetabled targets to meet and increase the national modal share in to 65% non-car based workplace travel within optimum timeframe.

3.3 Small Towns and Villages

The Draft RSES does not provide any direction of regional policy objectives for the sustainable development of the Regions small 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.

The National Planning Framework ("NPF") provides for "*demonstrable economic or social need to live in a rural area*". 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 Draft RSES should provide a clear and unambiguous definition for "economic need".

The RSES should provide Regional Policy Objectives for rural towns and villages which should set targets for the level of housing for rural communities to be accommodated in villages and smaller towns through initiatives such as 'serviced sites. Such a 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.).

4.0 Growth Ambition 1 - Economy and Employment

The RSES provides five key determinants for maximizing long-term economic development. These include:

1. Human capital, particularly education and skills
2. Sustainable communities (economically, environmentally and socially)
3. Access to markets (international, national and regional)
4. Comparative advantage of industry sectors, products or services and business competitiveness

5. Effective cross-sectoral and intergovernmental partnerships, including through place-based approaches so widely evident in the region.

In terms of priorities, the RSES aims to

1. Increase the emphasis on developing our Irish owned enterprises;
2. Harness the distinctive characteristics of our foreign and Irish owned enterprise mix through collaboration and clustering;
3. Place a spotlight on innovation and talent; and leverage our strengths in disruptive technologies so that we achieve our ambition with more enterprises developing new products, services and solutions to compete effectively against international competition;

The RSES needs to provide sector specific response to Climate Change and address 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 Renewable Energy and Low Carbon Future

The RSES acknowledges Ireland legally binding 2020 and 2030 targets and states that *"To achieve this, policies must encourage: Practices to reduce production of CO₂ ; Increase in our energy security ; and Reduced cost of electrical power; Increased industry development of modern high efficiency building materials; increased efficiency in development of renewable energy production; Improved efficiency of freight and passenger transport systems; Greater protection of areas of high primary production value; Greater protection of environmentally sensitive areas; Increase cluster of R&D focused on technological application to renewable energy"*.

The RSES sets out 10 Regional Policy Objectives (30-48). None of these objectives contain any specific percentage-based or timetabled targets. All are phrased as vague general objectives to *"support"* *"promote"* or *"improve"*, or in the case of GHG emissions to *"reduce our carbon footprint"*.

Ireland has expended considerable diplomatic and other resources in the recent past in pressing for collective reductions in EU climate ambition and in particular minimising Ireland's emission reduction commitments for 2030. Evidence for reverse acceleration includes:

- Increased spending on fossil fuel transport and infrastructure;
- Expansion in the national dairy herd;
- Continued harvesting and burning of peat - one of our most significant carbon sinks
- Granting of fossil fuel exploration licences;
- Increased use of coal at Moneypoint;
- Grants for the installation of fossil fuel boilers, etc.

In contrast, the Tipperary Energy Agency (**TEA**) is a model of how advice and support for citizen engagement can deliver major results in energy efficiency.

A genuine policy commitment to a TEA equivalent in every county would be an indication of the requisite ambition and a recognition of the scale of the challenge we face and the transition that must be effected within a dwindling timeframe.

The following recommendations of the deliberations of the Citizens' Assembly should be integrated into section 4.5.2 Renewable Energy and Low Carbon Future:

- 99% of members recommended that the State should enable, through legislation, the **selling back into the grid of electricity** from micro-generation by private citizens (for example energy from solar panels or wind turbines on people's homes or land) at a price which is at least equivalent to the wholesale price.
- 100% of members recommended that the State should act to ensure the greatest possible levels of community ownership in all future renewable energy projects by **encouraging communities to develop their own projects** and by requiring that developer-led projects make share offers to communities to encourage greater local involvement and ownership.
- 97% of members recommended that the State **should end all subsidies for peat extraction** and instead spend that money on peat bog restoration and making proper provision for the protection of the rights of the workers impacted with the majority 61% recommending that the State should end all subsidies on a phased basis over five years.
- 93% of members recommended that the number of **bus lanes, cycling lanes and park and ride facilities** should be greatly increased in the next five years, and much greater priority should be given to these modes over private car use.
- 96% of members recommended that the State should immediately take many steps to **support the transition to electric vehicles**.
- 92% of members recommended that the State should prioritise the **expansion of public transport** spending over new road infrastructure spending at a ratio of no less than two-to-one to facilitate the broader availability and uptake of public transport options with attention to rural areas.

4.2 Agri-Food

The agri-food sector is undoubtedly a major industry within the northern and western region amounting to 7.5% of the total numbers of persons employed in the region. This is compared to the State average of 4.4%, highlighting the heightened importance of the sector to the economy.

The RSES has acknowledged that *"Agriculture today is the biggest producer of GHG nationally and the sector which has demonstrated the smallest reductions"* and that in order for this sector to join into a low carbon economy, the region will have to *"radically change and manage its operational practices"*.

Notwithstanding these statements, the Regional Policy Objectives provides no meaningful shift away from the current agriculture model. Regional Policy Objective no. 52 provides for

the “*growth of the Region’s Agri-Food Sector, and to enable sectoral growth in rural areas*” without any mitigation measures.

4.2.1 Agri-economy and Climate Change

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.

The RSES fails to future proof this sector from the impacts of climate change. The objective for continued growth of this sector provides for a ‘*business as usual*’ model. This model will contribute to Ireland’s failure to meet our national and international climate targets, more extreme weather patterns, which in turn will impact on the economic viability of this sector. Regional Policy Objectives for this sector should be predicated on a risk based analysis.

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. It is not acceptable that the Draft RSES can, on one hand acknowledge the increasing emissions from this sector, yet on the other hand avoids addressing the Climate Impacts of and on this sector.

The entire lack of policy objectives aimed at reducing agricultural greenhouse gas emissions and thus future proofing this sector runs contrary to the achievement of National Strategic Outcome no. 3 and 8 which provides the following: “*Strengthened Rural Economies and Communities*”; and “*Transition to a Low Carbon and Climate Resilient Society*”.

4.2.2 Bio-economy

Regional Policy Objective no. 53 provides for the “support” of the bio-economy. With regards to this point, regard must be given to the impact of bio-methane production on climate. The ammonia, nitrate and general land use impact of Irish bovine agriculture require a reduction in herd numbers.

Cattle Slurry

Agricultural GHG increased by 2.7% in the most recent EPA reporting period for 2017 resulting from the continuing increases in the bovine herd. Current levels of bovine herd increase are incompatible with climate action, both globally and nationally, which require an increase in plant-based food production and a reduction in the bovine herd because of methane emission impact that is not capable of mitigation.

“Not So Green - Debunking the Myths Around Irish Agriculture”. 2016 Stop Climate Chaos and the Environmental Pillar. Link: http://www.antisce.org/sites/antisce.org/files/not_so_green_report.pdf

The current bovine herd increase is running into fodder availability limit and given the issues that arose in 2018 with the fodder crisis, and the fodder shortage during the 2018 drought, the reliability of an annual silage surplus for digestion cannot be guaranteed, if existing herd level continue to increase or are even maintained at current levels

Pig Slurry

Pig slurry is a major potential single ingredient for anaerobic digestion nationally. Given the concentration of pig farms into larger facilities and their geographic clustering, the first option should be to provide for an AD facility within the pig farm, or in close proximity to a cluster of pig farms and use of the biomethane created for electricity generation. There is a cumulative impact of industrial pig farming in conjunction with chicken farming with that in Northern Ireland exceeding Ireland’s ammonia threshold limit, which constrains further industrial farming.

Grass Silage

If grass is to be used as an energy crop it needs to be determined whether it is the most efficient in energy return compared to other energy crops or crops which would sequester carbon such as flax or hemp-based material for building insulation.

4.2.3 Agri-economy and our Environment

'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 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 required to achieve a model shift in this sector. The Draft RSES accommodates the continuation of current trends, which undermines the achievement of NSO no. 9: “*Sustainable Management of Water, Waste and other Environmental Resources*”.

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.

4.3 Marine and the Blue Economy

4.3.1 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.

A strong divide between marine and terrestrial planning frameworks still exists in coastal planning and management.

The Draft RSES provides no certainty or strategy with regards to the marine economy and the conservation of a marine environment.

Regional Policy Objective no. 59 seeks “*To enable the development (and / or expansion) of a number of strategic Marine Resource Innovation Parks, including locations at Greencastle, Killybegs, Co. Donegal and Cill Chiaran, Co. Galway, (Pairc na Mara), to increase aquaculture and seafood sectoral growth in the Marine Economy.*”

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.

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

Regional Policy Objective no. 64 seeks to “*enable the expansion of our Regional assets in the Blue Economy in the following sectors: Marine research & innovation; **Gas & Oil deposits within Irelands waters**; Seafood innovation through Greencastle, Killybegs, Pairc Na Mara, and other BIM fishery centres*”.

With regards to the expansion of oil deposits within Ireland’s waters, it is unclear what objective 64 seeks to achieve. It is of great concern if Objective no. 64 seeks to expand oil exploration and extraction along the western seaboard. In light of the unfolding global climate crisis, an objective to explicitly include the expansion of oil extraction runs contrary to achieving a low carbon society. The unsustainable pursuit of offshore oil at a time where climate science warns us against the burning of our fossil reserves should not be an objective of the RSES.

The capping and reduction of climate emissions required to meet the Paris Agreement target of containing global temperature increases at no more than 1.5 degrees above pre-industrial levels required that most existing known coal, oil and gas fields must be left in the ground. This means there is no justification for further oil and gas exploration in Irish waters. See an Taisce submission on the Marine Planning Framework, December 2018:

5.0 Growth Ambition 2 – Environment – Natural Region

5.1 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.

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.

In relation to one-off houses in the Irish countryside, 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.

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.

5.2 Peatlands

Nationally peatlands comprise 20% of the Irish land area and 75% of organic soil carbon. 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 existing dates for burning of peat for power generation or domestic fuel and use of peat for horticulture and animal housing bedding.

6.0 Growth Ambition 3 – Connectivity – Connected Region

Chapter 6 of the NWRA 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.

The RSES provides that *“A best practice example of where the integration of transport, spatial and economic planning is to be delivered, is through the Galway Transportation Strategy, which should be used as a template elsewhere and initially as a priority in Sligo, Athlone and Letterkenny, incorporating the cross- border network with Derry.”*

An Taisce submits that the options and schemes identified in the Galway Transport Strategy (“GTS”) are limited and considers that more walking and cycling infrastructure could have been explored. The lack of prioritisation and full scope of public transport and active transport infrastructure in the GTS has resulted in traffic congestion in and around the city.

In the last quarter of 2018 a Strategic Infrastructure Development (“SID”) application was lodged with An Bord Pleanála for the N6 Galway City Ring Road Scheme. An Taisce submitted that the “Do something Traffic Management Alternatives” were predicated on a document (the GTS) with limitations. Having regard to this point, An Taisce submits that the objective which considers the GTS as a “best practice example” needs to be strengthened in order to ensure absolute prioritisation of public transport and active transport infrastructure over car-based infrastructure.

In order to reverse car dependency in the NWRA, 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 Transport Investment Priorities

Section 6.3 of the NWRA Draft RSES sets out transport investment priorities under the following headings:

- International Connectivity;
- Road Network;
- Rail;
- Bus;
- Rural Transport;
- Walking and Cycling;
- Facilitating Cross Border Sustainable Transport; and
- Island Marine Infrastructure.

Regional Policy Objectives 108-112 sets out major road projects to be “*pursued*”, “*progressed*” and “*delivered*”.

There are no meaningful objectives set out for Rail (nos. 113-119), Bus (nos. 120-124) and Rural Transport (nos. 125-127). The terminology used in the Regional Policy Objectives for

these areas changes direction compared to Regional Policy Objectives for road projects. Vague and broad terms such as “*support*”, “*review*”, “*promote*” and “*investigate*” are used. The terminology alone between rail, bus and rural transport and road project objectives highlights that road network investment is a clear priority of the Draft RSES. This is an inappropriate approach and undermines Irelands GHG targets and achievement of healthy living environments.

The most realistic and cost effective pathway to radically reduce emissions from the transport sector is via investment in public transport and the creation of attendant public transport friendly, compact places.

There is no time for contradictory policies in respect of climate change. All policies favouring carbon and energy intensive infrastructure should be purposively discontinued, such as motorways and airport expansions. Investment needs to be redirected to public transport and walking and cycling infrastructure.

6.1.2 Enabling Local Transport Plans

Section 6.9 provides for Local Transport Plans (“**LTPs**”) to be prepared or the Key Regional Centres and Towns, based on the Area Based Transport Assessment (“**ABTA**”) guidance produced by NTA and TII.

A Policy Objective for LTPs seeks to “*promote walking, cycling and public transport by maximising the number of people living within walking and cycling distance of their neighbourhood or district centres, public transport services, and other services at the local level such as schools*” (no. 131).

In order to achieve a regional commitment to equivalent living conditions, a core RSES objective should be that no new housing development shall be permissible which is greater than 15-minute walking distance from basic services and infrastructure e.g. public transport, supermarkets, childcare facilities, school, post offices, etc. Regional and local plans should be charged with determining such services and locations, and where there is a deficit, they must be upgraded in tandem with housing development. This simple principle, rigorously enforced, is possible and would go furthest in achieving the objectives of smart, compact growth espoused in the NPF and in regenerating our rural towns and villages.

The Draft RSES fails to provide measurable targets and definitive guidelines for future development integrated with public and active transport infrastructure. Rather the objectives simply use vague and broad terminology that could not be enforcement in CDPs and LAPs.

6.1.3 Decarbonising Transport

Regional Policy Objectives 133 and 134 provides for the Electrical Vehicles (“**EVS**”).

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 Growth Ambition 4 – Quality of Life – Inclusive Region

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 to create compact settlements which enhance the quality of life of citizens, 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.

-end-