

## Heather Cooke

---

**From:** Tara Higgins <[REDACTED]>  
**Sent:** 23 January 2019 16:01  
**To:** RSES  
**Cc:** SEA  
**Subject:** EPA submission on Draft Eastern & Midland Regional Spatial & Economic Strategy and SEA  
**Attachments:** SCP171203.2 EPA Submission EMRA RSES.pdf  
**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mr Conway,

We acknowledge your notice, dated 5<sup>th</sup> November 2018, in relation to the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region (the RSES) and accompanying Strategic Environmental Assessment (SEA) Environmental Report.

Please find attached the EPA's submission in relation to the Draft RSES and SEA Environmental Report.

Please send an email confirming receipt of this submission to [sea@epa.ie](mailto:sea@epa.ie).

Yours sincerely

Tara Higgins

**Dr Tara Higgins,**  
SEA Section,  
Office of Evidence and Assessment,  
Environmental Protection Agency,  
PO Box 3000,  
Johnstown Castle Estate,  
Wexford, Y35 W821  
Tel: +353 53 9160647  
Email: [REDACTED]

123456789

123456789



RSES Submissions  
Eastern & Midland Regional Assembly  
3<sup>rd</sup> Floor North, Ballymun Civic Centre  
Main Street  
Ballymun  
Dublin

Regional Inspectorate,  
Inniscarra,  
County Cork, Ireland  
Cigireacht Réigiúnach, Inis Cara  
Chontae Chorcaí, Éire  
T: +353 21 487 5540  
F: +353 21 487 5545  
E: [info@epa.ie](mailto:info@epa.ie)  
W: [www.epa.ie](http://www.epa.ie)  
LoCall: 1890 33 55 99

23<sup>rd</sup> January 2018

Our Ref: SCP171203.2

**Re. Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region and associated SEA Environmental Report**

Dear Mr Conway,

We acknowledge your notice, dated 5<sup>th</sup> November 2018, in relation to the Draft Regional Spatial and Economic Strategy for the Eastern and Midland Region (the RSES) and accompanying Strategic Environmental Assessment (SEA) Environmental Report.

The EPA is one of five statutory environmental authorities under the SEA Regulations. We focus on promoting the full and transparent integration of the findings of the SEA into the RSES and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the RSES. Our functions as an SEA environmental authority do not include approving or enforcing the SEA or the RSES.

We welcome the preparation of the RSES which sets out how the commitments and objectives of the National Planning Framework (NPF) are to be realised within the Eastern and Midland Region over the next 12 years. We acknowledge the extensive consultation and engagement undertaken by the Regional Assembly and the SEA team throughout the preparation of the RSES and welcome the extent to which this has been reflected in the draft strategy and SEA Environmental Report.

With continued population growth, economic expansion and urbanisation expected in the region over the lifetime of the RSES, it is essential that environmental and sustainable development considerations are placed at the heart of decision making. A clean, well-protected environment is vital for our health, wellbeing and quality of life, and supports our economy.

The scale of the key environmental challenges facing Ireland should not be underestimated. Recent EPA reports show we will not meet our 2020 or longer-term targets on reducing



greenhouse gas emissions. Water quality in rivers continues to decline<sup>1</sup>, while 28 wastewater treatment plants serving large urban areas continue to fail to meet EU Standards<sup>2</sup>. These reports clearly point to the need for more integrated land and catchment management practices, greater investment in infrastructure and accelerated action on climate change.

The NPF, if effectively implemented, will guide spatial planning in Ireland onto a more environmentally sustainable pathway and ensure that zoning and development is underpinned by adequate and appropriate infrastructure to protect the environment and public health. We acknowledge the degree to which the aspirations and commitments in the NPF have been reflected in the RSES. We welcome in particular the large number of environmental-related Regional Strategic Outcomes and Regional Policy Objectives, which align with the key messages and actions in our State of Environment Report (EPA, 2016).

Our submission includes a number of observations and recommendations to consider in finalising the RSES and SEA, focusing in particular on the EPA's remit and areas of expertise including water, air, climate change waste and noise aspects. Further specific comments on the RSES are provided in Appendix I and observations on the SEA Environmental Report are included Appendix II, and should also be considered prior to finalising the RSES.

## **General Comments and Recommendations**

### ***Alignment with Other Key Plans and Programmes***

The RSES should fully align with relevant environmental policy, plans and programmes at national and regional level. The National Mitigation Plan, National Adaptation Framework, River Basin Management Plan for Ireland, National Landscape Strategy, National Biodiversity Action Plan and National Clean Air Strategy, and related monitoring and reporting, should inform the development and implementation of the RSES. Following adoption of the RSES, additional key plans prepared at national or regional level should be incorporated into the RSES, where relevant, during interim reviews. A schematic showing the linkages between the RSES and other key regional and national plans would be useful.

While the Regional Strategic Outcomes are clearly linked with the relevant NPF National Strategic Objectives, we recommend it is important to also make the links with the relevant UN Sustainable Development Goals (SDGs). This would serve to illustrate how the RSES supports the delivery of the UN 2030 Sustainable Development Agenda.

The three key cross-cutting principles underpinning the RSES are described in section 2.2. as Healthy Placemaking, Climate Action and Economic Opportunity. While we welcome the prominence given to climate action, the need for wider environmental protection merits further recognition in the key principles. A healthy, well protected environment is fundamental to both Healthy Placemaking and Economic Opportunity and planning authorities have a key role in this regard.

---

<sup>1</sup> 'Water Quality in 2017 – An Indicators Report' (EPA, 2018)

<sup>2</sup> Urban Waste Water Treatment in 2017 (EPA, 2018)



To recognise that a healthy environment supports all other activities, Figure 2.4 could be shown as a nested Venn diagram with the economic objectives in the centre, surrounded by the social objectives and in turn the environmental objectives.

#### ***Transition to a Low Carbon & Climate Resilient Region***

We welcome the commitment to prepare a Regional Decarbonisation Plan in collaboration with the new Climate Action Regional Office. The merits of placing the Regional Decarbonisation Plan on a legislative footing should be considered. The Plan should propose ambitious measures and targets for various sectors within the region to tackle climate change.

The Regional Decarbonisation Plan should align with the National Climate and Energy Plan (DCCAIE, in prep), which represents a key element of the national effort to deliver on Ireland's climate change commitments and will require effective implementation at the regional and local authority level. It should also align with other relevant sectoral and local authority climate plans (including the four Dublin Authority Climate Change Action Plans currently in prep). The inclusion of a graphic showing the hierarchy of relevant climate-related plans and their associated targets and commitments, would be a useful addition.

We note that the RSES sets out requirements for local authorities in relation to building standards, energy performance and decarbonising electricity generation and transport. Support for the promotion of 'sustainable buildings' that achieve certification under systems such as the Home Performance Index (HPI) and Leadership in Energy and Environmental Design (LEED) at local authority level, would be a useful addition.

#### ***Critical Water Service Infrastructure - Coordination and Integration***

The RSES sets out a strategy for the growth of key settlements in the region. Providing the water and wastewater treatment infrastructure to meet the proposed growth projections will represent a significant challenge, particularly given the decades of underinvestment in water and wastewater treatment and the challenges posed by climate change.

The RSES should ensure that local authority development plans (and local area plans) are aligned with Irish Water's Capital Investment Plan, which prioritises national investment in its water and wastewater treatment infrastructure and Irish Water's National Water Resources Management Plan (in prep.). Planning, population growth and economic development should be fully aligned with the provision of adequate and appropriate water and wastewater treatment to protect water quality and human health.

Recent extreme weather events have highlighted the vulnerability of our water supply infrastructure. In particular, the 2018 summer drought highlighted that the need for additional headroom should be considered for the entire Eastern and Midland region (not just the GDA), in the context of planning for population, industrial and economic development over the period of the RSES.

With 50% of national population growth targeted at 'large and smaller towns, villages and rural areas' under the NPF, the RSES should promote sustainable management of wastewater in smaller towns, villages and communities, as well as outside the Irish Water network. An



unsustainable increase in private treatment plants serving industry and housing estates in rural areas should be avoided

The RSES should ensure that one-off housing in non-serviced rural areas is strongly deterred within local authority land use plans, particularly in areas where achieving suitable drainage for domestic wastewater treatment systems is difficult. We welcome *RPO 4.51* which encourages the provision of serviced sites in a rural context as a viable alternative to one-off rural housing. We recommend including specific targets and timeframes to drive implementation of this policy objective.

### ***Sustainable Transport***

Our transport system is highly fossil fuel dependant, resulting in significant emissions of greenhouse gases and other air pollutants. A significant transformation is needed to decarbonise our transport system. The RSES includes welcome commitments to promote sustainable modes of transport, extend public transport and park-and-rides, integrate land use and transport planning and integrate green infrastructure networks. These commitments could be strengthened by including measurable targets and timeframes for delivery, to help drive implementation.

This section would benefit from the inclusion of a graphic illustrating the 'sustainable transport hierarchy', showing walking/cycling at the top and private car use at the bottom. This would serve to emphasise the re-prioritisation needed in transport planning and investment decision-making. Including a strong commitment to adhere to this hierarchy in the 'Guiding Principles' (p.145) would be a welcome addition.

As well as promoting more sustainable modes of transport within new developments, the RSES would benefit from specific measures to tackle legacy issues in existing settlements. This could include, for example, promoting a programme of Local Authority 'walkability' audits of existing towns and villages to identify problem areas and physical barriers to walking and drive targeted improvements in the design of pedestrian routes and crossings, speed-calming measures, siting of facilities/amenities etc. Improving the walkability and cyclability of settlements is a relatively cost-efficient intervention that can yield valuable co-benefits for people's health, the environment, social inclusion etc.

Much of the discussion in the RSES is focused on commuter journeys, while a significant proportion of journeys are taken for shopping, social or recreation purposes (National Travel Survey, 2016). The RSES should consider options to enable more sustainable, low carbon modes for all journey types. Section 9.4 *Placemaking* alludes to 'out of town shopping' as a driver of decline in urban centres but the issue merits further analysis. There is also a need to expand on the impacts of 'reverse commuting' and its role in sustainable transport. Greater emphasis is needed on the infrastructure necessary to support the uptake of electric cars and alternative fuels. The RSES should also consider behavioural change aspects and how it can do more to encourage commuters and others to move to low carbon transport options.

More sustainable options are also needed for freight transport across the region. We recommend that a separate strategy for freight transport is prepared. Given the national



importance of the ports in the region, the risk to supply chains from extreme weather and climate should be considered as part of this.

### ***Brownfield Redevelopment***

We welcome the focus in the RSES on encouraging brownfield over greenfield development, which supports core-strategy based development. It also recognises the value of greenfield sites to human health, flood relief, amenity/recreation and as an ecological resource. In prioritising brownfield development, it will be important that these areas, which may have legacy soil contamination issues, are subject to appropriate investigations and environmental assessments. Contaminated soil arising from urban regeneration should be managed in accordance with the relevant regional waste management plan.

### ***Implementation of the RSES***

Delivery of the RSES will require effective implementation of the Regional Policy Objectives at regional, county and local level. Achieving this will require a collaborative, partnership approach between the Regional Assembly and local authorities across the region. The commitment to establish an implementation group to monitor and review progress in achieving the Regional Strategic Outcomes over the lifetime of the RSES is welcome.

We recommend also establishing an environmental subgroup to monitor how effectively the RSES's environmental commitments are being implemented at Local Authority level. Tracking of environmental performance could be linked with the EPA's cyclical *Ireland's Environment* reporting and related topic (air, water, climate etc.) reporting by EPA and other authorities.

Tackling the complex environmental challenges facing Ireland requires collaboration and knowledge transfer. We recommend including a commitment to establish a series of regional fora over the lifetime of the RSES, to facilitate awareness raising and knowledge transfer among local authorities on cross-cutting environmental issues such as integrated catchment management, climate action etc. The EPA will support these regional fora where relevant.

Finally, it would be useful to include estimated timeframes for delivery of the key projects and lower-level plans under the RSES, along with the responsible authority(ies). Examples include key infrastructure plans, the Dublin Metropolitan Area Strategic Plan, various cross Local Authority Urban Area Plans, the proposed Regional Landscape Character Assessment, etc.

### ***Integration of the SEA and the RSES***

We acknowledge the extent to which the recommendations and mitigation measures in the SEA Environmental Report have been reflected in the Regional Strategic Outcomes and guiding principles in the RSES. There is a clear recognition in the RSES that development and population growth must be managed and planned for in an environmentally sustainable, integrated manner. This is supported by Objective RPO 3.2 that all plans, projects and activities requiring consent arising from the RSES are subject to the relevant environmental assessments including SEA, EIA and AA. Additional comments on the SEA Environmental Report are provided in Appendix II.



### **Future Amendments to the RSES**

You should screen any future amendments to the RSES for likely significant effects on the environment, using the same method of assessment applied in the “environmental assessment” of the RSES.

### **SEA Statement – “Information on the Decision”**

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

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

You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

### **Environmental Authorities**

Under the SEA Regulations, you should also consult with:

- The Minister for Housing, Planning and Local Government,
- The Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears to you as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects on fisheries or the marine environment,
- The Minister for Culture, Heritage and the Gaeltacht where it appears to you as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, and
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

Again, the EPA welcomes the opportunity to comment at this stage of the RSES and SEA process. We look forward to engaging with the Eastern and Midland Regional Assembly in supporting the implementation of the RSES at local authority level.

Please send an email confirming receipt of this submission to [sea@epa.ie](mailto:sea@epa.ie). If you have any queries in relation to this submission, you can contact the SEA Team at [sea@epa.ie](mailto:sea@epa.ie) also.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Jonathan Derham'.

---

Dr Jonathan Derham, Programme Manager  
*Office of Evidence and Assessment*





## Appendix I – Specific Comments on the RSES

### Chapter 1 – Introduction

Consider amending the first bullet point in the grey box text in *Section 1.3* (p.6) as follows: *“to manage future growth in a sustainable manner, and ensure the creation...”*.

### Chapter 2 – Strategic Vision

In *Section 2.2*, the fourth bullet point in the grey text box, could be amended to refer to *“energy and resource efficient buildings and industry...”*, to recognise the need for improvements in the environmental performance of buildings throughout their lifecycle, (including use of materials and water).

To embed the consideration of biodiversity in planning decisions at all levels, we recommend amending RSO 11 as follows: *“Promote co-ordinated and integrated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection.”*

In relation to *‘Healthy Placemaking’*, the Heritage Council, Department of Housing Planning and Local Government and other stakeholders recognise the need for healthy town centres. These initiatives should be promoted and supported in the RSES.

### Chapter 3 – Growth Strategy

To strengthen the link between the SEA and the RSES, we recommend amending the text for the ‘Natural Capital’ criteria in Table 3.1 as follows. *“Integration of the recommendations and proposed mitigation measures, arising from the SEA/AA/FRA...”*

We welcome the inclusion of RPO 3.4, requiring Local Authorities to promote an ecosystem services approach to the preparation of statutory land use plans. The scope of this could be broadened to include project level development applications. This would help protect local ecological corridors and biodiversity and their associated services.

### Chapter 4 – People and Place

Section 4.2 and Table 4.1 sets out the proposed settlement strategy for the region. The relevant aspects from the Irish Water Capital Investment Plan could be referred to here to highlight the current (and projected) ability of critical service infrastructure to accommodate this growth.

We welcome RPO4.2 which requires that infrastructure investment and priorities are aligned with the spatial planning strategy of the RSES to ensure appropriate services are provided without exceeding the assimilative capacity of the receiving environment.

To avoid the over-zoning of development lands, the implementation of the Core Strategy approach to development should be maintained and phased according to the population and growth projects set out in the RSES and the NPF.



In relation to the Regional Growth Centres (section 4.5), the SEA recommends specific mitigation measures in terms of the wording of the Objectives for these areas which should be considered and integrated into the RSES as appropriate.

Sections 4.6-4.8 describe proposals for Key Towns, Other Towns and Rural Areas. Growth of these settlements should be in accordance with the principles of proper planning and sustainable development. EPA reports identify issues with water quality and wastewater treatment infrastructure a number of these areas. Where specific mitigation measures or recommendations are provided in the SEA, these should also be reflected in the final RSES.

In relation to *Rural Areas*, we recommend including a commitment to protect established ecological corridors and features such as hedgerows, significant stands of trees etc., when considering rural-based development.

Regarding RPO 4.5.4, which discourages one-off rural housing, we note that the SEA recommends different wording to strengthen this commitment. In finalising the RSES, we recommend that the wording proposed in the SEA Environmental Report is adopted.

#### **Chapter 5 – Dublin Metropolitan Area Strategic Plan (MASP)**

We recommend that a separate spatially specific SEA is carried out for the development of the Dublin MASP, as recommended in the SEA Environmental Report.

It would be useful to indicate whether the proposed public transport projects are expected to be delivered over the lifetime of the RSES. Noise, air quality, climate, landscape and biodiversity considerations should be integrated as appropriate in these projects and the requirements of the SEA, AA, EIA, Floods directives should be taken into account.

RPO 5.7 could be strengthened as follows: “...to identify, manage, ~~and~~ develop and protect regional green infrastructure ...”.

#### **Chapter 6 – Economy and Employment**

While we welcome the inclusion of RPO 6.2 (requiring local authorities to have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments in accordance with the National Adaptation Framework), further information should be provided on how this will be implemented and monitored.

In relation to RPO 6.16 which proposes to support enhanced access to state-owned National Parks, Forest Parks, waterways etc., access should be planned and managed in a manner that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism.

We welcome RPO 6.17 which supports the need for tourism strategies and plans to include clear monitoring protocols to determine the ongoing effect of tourism on sensitive features.



## Chapter 7 - Environment

### Noise

In Section 7.3, it would be useful to include a specific reference to the NPF's National Policy Objective 65: *'Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.'*

Round 3 noise mapping information is available on the EPA website at <https://www.epa.ie/monitoringassessment/noisemapping/> and should be used to inform development within the EMRA region. There would also be merit in referring to the new Environmental Noise Guidelines published by the World Health Organisation.

### Water Quality

We suggest that RPO 7.10 be amended as follows "... Local Authority land use plans Development Plans" to also account for local area plans, masterplans etc.

We recommend amending the subsection on Integrated Catchment Management (p.117 second paragraph) as follows, for clarity:

*"The Local Authority Waters Programme has been set up to assist the process and comprises of the Communities Office and the Catchment Assessment Team. The Communities Office is responsible for driving public engagement and consultation with communities and stakeholders and co-ordinating these activities across all local authorities, while the Catchment Assessment team is responsible for carrying out scientific assessments and driving implementation of measures in the 190 Areas for Action as outlined in the River Basin Management Plan. There are two regional committees supported by the Local Authority Waters Programme in the Eastern and Midland Region which include the Border, and the Midlands and Eastern regions"*

Similarly, paragraph three of this subsection could be amended as follows:

*"The regional committees are currently developing a Regional Integrated Catchment Management Programme for the period of this RBMP (2018– 2021) which will set out evidence-based measures to target pressures impacting water bodies identified as being 'At Risk' in Areas for Action prioritised under the RBMP. A key aim of Integrated Catchment management is to facilitate the movement and sharing of data and information between Local Authorities, the EPA and other relevant public authorities at the water-body and catchment scale."*

RPO 7.11 could be amended as follows:

*"For water bodies with 'high ecological status' objectives in the Region, Local Authorities shall incorporate measures for both their continued protection and to restore those water bodies that have fallen below high ecological status and are 'At Risk' 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 water bodies"*



*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."*

The section on Integrated Catchment Management should refer to the *Water and Planning Guidance* currently being prepared by DHPLG, which should assist planning authorities in implementing the requirements of the Water Framework Directive.

#### Biodiversity and Green & Blue Infrastructure

Regarding section 7.6 *Green and Blue Infrastructure*, the EPA has published research reports on ['Integrating Ecosystem Approaches, Green Infrastructure and Spatial Planning'](#), and ['Green Infrastructure: A 'How To' Guide for Disseminating and Integrating the Concept into Spatial Planning Practice'](#).

Areas outside of designated sites (and associated ecological linkages) play an important role in supporting wider biodiversity. To acknowledge this, we recommend including an additional RPO that provides for the *protection and enhancement of areas of local ecological value*.

In considering the designation of a national park for the Midlands peatlands area (RPO 7.19), the National Peatland Strategy should be taken into account as appropriate. A commitment to prepare a management plan for the park, in collaboration with the NPWS, Irish Peatlands Conservation Council and other relevant stakeholders, should also be considered.

#### 7.7 Landscape

We welcome RPO 7.25, whereby the Regional Assembly will prepare a regional Landscape Character Assessment (LCA) to inform planning and landscape management in the region. This could be strengthened by committing to deliver the regional LCA within a set timeframe following adoption of the national LCA. The regional LCA should be informed by updated county LCAs, given that significant development has occurred since the publication of the National Landscape Strategy which may not be reflected in earlier LCAs.

#### 7.8 Climate

RPO 7.32 is important in terms of aligning and ensuring consistency across local authority areas in preparing their adaptation strategies.

RPO 7.36 states that *'A bio-economy plan for the Region should be developed'*. This could be strengthened by including a stronger commitment (*'shall be developed'*) and a timeframe for the plan.

The shift in living/tenure patterns across the region (section 9.3) has implications for achieving low carbon transition in residential heating and renewable energy (i.e. landlords have responsibility for investing in upgrading the rented housing stock but tenants directly benefit). The RSES should consider options and associated commitments to enable low carbon transition within this growing sector, in collaboration with the relevant stakeholders.



The section on Decarbonising Electricity Generation (p.135) refers to harnessing renewable energy '*focusing in particular on the extensive tracts of publicly owned peat extraction areas*'. This text should be amended to emphasise that in all future renewable energy projects, environmental sensitivities, including cutaway peatlands, must be appropriately protected.

### **Chapter 8 - Connectivity**

We welcome the focus on integrated transport planning within the RSES. The *Planning Land Use and Transport – Outlook 2040* (PLUTO) plan currently being prepared by the Department of Transport, Tourism and Sport will be important to integrate into the RSES upon its completion. It should also inform the preparation of the Metropolitan Area Transport Plans / Strategies within the region. The inclusion in the RSES of timeframes for the delivery of the key rail, bus and road projects within the region would be welcome.

With a view to maintaining important ecological corridors, we would welcome the integration of appropriate safe crossing points for wildlife into transport related projects.

Air quality and noise should be key considerations in the development of transport infrastructure. Local Authority noise action plans should assist informing potential implications for land use adjacent to transport related development activities.

RPO 8.15 on Dublin Airport should refer to EU Regulation 598/2014 which sets out a standard approach to dealing with noise problems at airports. Fingal County Council is expected to be appointed as the Competent Authority to regulate airport noise at Dublin Airport.

### **Chapter 9 - Quality of Life**

In the guiding principles for the regeneration of brownfield lands, there is merit in considering including a requirement to prepare an environmental management plan for larger scale sites, to address aspects such as management of contaminated soil, traffic, noise, groundwater etc.

### **Chapter 10 – Infrastructure**

The guiding principles relating to surface water (p. 178) could be amended to recognise the importance of green infrastructure in protecting water quality:

*Include policies and actions to encourage the integration of 'soft' measures including SUDs, green space, green infrastructure and permeable surfaces in the design of drainage and sustainable water management of existing and future developments*

The guiding principles for energy-related development should include the climate resilience of related infrastructure and environmental considerations such as landscape character/visual impact, water quality, biodiversity, impacts on soils etc.

#### ***Water Supply***

The RSES and SEA should consider the importance of water quality in a water supply context (as well as in a WFD context). Delivering additional headroom to meet increased demands should not impact on existing drinking water quality. To this end, we recommend including a



commitment to avoid any deterioration in water supplies currently meeting drinking water legislative requirements due to additional demands that may be made on these supplies.

*Section 5.5* (p.71) refers to proposed water and waste water projects, including the Water Supply Project for the Eastern and Midlands Region to supply water to Dublin and the Vartry water supply scheme. We recommend including a similar acknowledgement to future-proof water and wastewater treatment infrastructure outside of the GDA area.

The RSES should include reference to and consideration of the *Water Environment (Abstractions) Bill 2018* and the associated licensing requirements, which may have implications on economic and housing development within the region over the lifetime of the strategy. It is also worth noting that the recast of the Drinking Water Directive, and potential future legislative requirements, may make achieving drinking water quality compliance more difficult, in the event of an increased demand on supplies.

#### *Waste Water*

The report on *Urban Waste Water Treatment in 2017 (EPA, 2018)* lists 132 areas where improvements are needed to resolve environmental priorities. We welcome that the EMRA supports the delivery of wastewater treatment infrastructure set out in Table 10.2. The expected timescale should be provided, where available, for the projects listed.

RPO 10.5 commits to supporting Irish Water and Local Authorities to eliminate untreated discharges from settlements to increase compliance with the UWWT Directive. We would welcome a similar commitment and timeline for improving compliance with Water Framework Directive quality standards.

#### *Surface Water*

The guiding principles relating to surface water (p. 178) could be amended to recognise the importance of green infrastructure in protecting water quality:

- *Include policies and actions to encourage the integration of 'soft' measures including SUDs, green space, green infrastructure and permeable surfaces in the design of drainage and sustainable water management of existing and future developments*

#### *Energy*

The guiding principles for energy-related development (red box on p.180) should refer to improving the climate resilience of energy infrastructure and environmental considerations such as landscape character/visual impact, water quality, biodiversity, impacts on soils etc.

Further development of the gas network (RPO 10.15) should be consistent with the National Transition Objective and the Draft National Energy and Climate Plan. The impact on greenhouse gas emissions of an expanded gas grid should be considered.



## Appendix II – Specific Comments on the SEA

Where specific mitigation measures or recommendations are provided in the SEA, these should be reflected in the final RSES.

### Content of the Environmental Report

We welcome and acknowledge that the key messages from our State of the Environment Report (EPA, 2016) has been integrated into the SEA.

### Environmental Baseline

#### Air

The Air related baseline in the SEA Environmental Report references the 2017 EEA report, there is now a 2018 report available '[Air Quality in Europe – 2018 Report](#)'.

The latest air pollutant projections can be consulted at:

[https://cdr.eionet.europa.eu/ie/eu/nec\\_revised/projected/envwzy\\_8a/](https://cdr.eionet.europa.eu/ie/eu/nec_revised/projected/envwzy_8a/)

#### Greenhouse Gas Emissions

Recent information on greenhouse gas emissions can be consulted at:

<http://www.epa.ie/pubs/reports/air/airemissions/ghgemissions2017/>.

#### Land Cover

The LULUCF Regulations are now in place (2018/841/EU) and should be referred to.

### Recent EPA Reports

In addition to the reports referred to elsewhere in this submission, other key recent EPA reports to consider in finalising the SEA and RSES include:

- [Drinking Water Report for Public Water Supplies – 2017](#) (EPA, 2018)
- [Bathing Water Quality in Ireland – A Report for the Year 2017](#), (EPA, 2018)
- [Air Quality in Ireland 2017 Report](#) (EPA, 2018)
- [Water Quality reports for 2017](#)
- [EPA recent Climate research reports](#)
- [EPA Radiation-related reports](#)

### *Relevant plans, policies and programmes*

We note the various plans, policies and programmes considered in preparing the SEA Environmental Report (Chapter 4). We acknowledge that local area plans, such as local heritage and biodiversity plans, will be influenced by county level plans. It is worth considering including a commitment that encourages local authorities within the region to review their existing heritage and biodiversity plans. This would support the Regional Assembly's target to compile a Biodiversity Action Plan. It would also assist in ensuring that decision making around development and zoning over the new planning period for the RSES is informed by the most up-to-date information on biodiversity.



### **Assessment of Alternatives**

We acknowledge the range of alternatives considered and assessed as part of the development of the RSES. The assessment of alternatives clearly demonstrates how the preferred alternatives selected for the RSES align with and support the National Planning Framework.

### **Mitigation Measures**

We welcome the extent to which the proposed mitigation measures and recommendations from the SEA (and AA) processes, summarised in Tables 10.1 and 10.2, have been reflected in the policy commitments within the RSES. We note that Chapter 9 of the SEA Environmental Report '*Changes made to September 2018 Draft RSES Prior to Publication of the SEA ER*' recommends some additional changes, including the re-introduction of some previous wording of policy objectives etc. Where any of the mitigation measures or recommendations put forward in the SEA Environmental Report or Natura Impact Report are not incorporated into the final RSES, appropriate justification should be provided.

With regards mitigation measures relating to air pollution control, the National Air Pollution Control Programme should be referenced and considered.

### **Monitoring**

We acknowledge the environmental monitoring programme as described In Table 10.3 Proposed Environmental Monitoring.

Under Objective 5 Air Quality, an improvement in air quality trends is included, in relation to emissions from transport of NO<sub>x</sub> and PM. This should include reductions in emissions and ambient concentrations of NO<sub>2</sub>, NO<sub>x</sub> and PM<sub>10</sub> and PM<sub>2.5</sub>.

The SEA-related monitoring should be linked with the RSES implementation monitoring and reporting, to enable the effectiveness of the RSES in protecting environmental sensitivities to be evaluated.

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. It should consider and deal with the possibility of cumulative effects.

If the monitoring identifies adverse impacts related to the implementation of the RSES, the Regional Assembly should ensure that suitable and effective remedial action is taken.