

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



11th April 2019

Our Ref: SCP171203.3

Re. Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy 2019–2031 for the Eastern and Midland Region

Dear Sir / Madam,

We acknowledge your notice, dated 15th March 2019, in relation to the proposed Material Amendments (the ‘Amendments’) to the Draft Regional Spatial and Economic Strategy 2019–2031 for the Eastern and Midland Region (the ‘RSES’).

The EPA is one of five statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

We note the environmental assessment findings and recommendations for the Amendments. In finalising the Amendments, all the SEA recommendations should be considered in finalising the RSES. Where any recommendations are not integrated, the SEA Statement should provide the reasoning for this and the RSES should also clarify the necessary mitigation / enhancement measures required to minimise potential for likely significant effects and ensure alignment with plan objectives and higher-level plan commitments.

A number of additional specific comments are provided below, to consider prior to finalising the Amendments.

Specific Comments to be considered

Tourism

We note the proposed amended and new objectives relating to tourism. In planning future tourism-related developments, consideration should be given to the environment's capacity to absorb additional development and the need to protect designated sites, protected species and supporting ecological linkages. We support the recommendation in the Environmental Report on the need for tourism-related plans to recognise and reflect the environmental sensitivities within the region and consider potential for cumulative and in combination effects. This recommendation should be reflected in the final RSES.

We acknowledge the recommendation that tourism initiatives, including Ireland's Ancient East and Ireland's Hidden Heartlands, should consider the requirements of the SEA and Habitats Directives respectively. Additionally, in relation to the proposed RPO to support regional tourism strategies (including local strategies) and the proposed Barrow Blueway, at a regional level, the RSES should ensure that the requirements of relevant directives including the SEA, Habitats, Water Framework, EIA and Floods directives are integrated as appropriate and relevant in any such strategies that arise over the lifetime of the RSES.

We support the recommendation to prepare management plans for the Wicklow and Slieve Bloom Mountains, to assist in managing tourism (and recreation / amenity) activity in these sensitive areas, over the lifetime of the RSES. The requirements of the SEA and Habitats Directives should be taken into account, as appropriate.

Rural diversification

We support the SEA recommendation for RPO 4.5.2 (diversification of rural economies) that proposals / initiatives to grow the rural economy reflect the outcome of the planning/environmental assessment processes. This is with a view to ensuring that future developments in rural areas are environmentally sustainable.

Local Authority collaboration on land use planning

We recommend that the collaboration between adjoining local authorities in preparing specific urban area plans and local area plans, described in *Chapter 4 – People and Place*, should also include a coordinated approach to environmental protection and environmentally sustainable development.

Development related

In relation to RPO 4.29 (Support the delivery of a network of distributor roads and bridges to release strategic residential and employment lands for development and improve connectivity and the efficient movement of people and services in Farganstown), we support the SEA recommendation that this RPO should not be altered as proposed, due to the identified conflicts with existing RPOs and the potential for negative and indirect impacts on many environmental protection objective assessment criteria.

In relation to the proposed new RPO above 4.43 (page 36) and the new RPO above RPO 4.46 (p37), we support the recommended wording changes to reflect the need to protect designated



sites. Where '*international nature conservation interests*' relate to European sites designated under the Habitats Directive, this should be clarified, with a view to ensuring that the relevant requirements are fully integrated.

The above recommendation also applies to the proposed new RPO under 4.48 (page 40), relating to the proposed national Enterprise Park Masterplan in Portlaoise. Where the masterplan proposes the zoning and development of lands, the requirements of the SEA, Habitats and Floods Directives, in particular, should be taken into account.

The new RPO '*Support development of underused lands along the River Barrow*' above RPO 4.50 (page 42) does not appear to take into account the potential direct and indirect impacts on the River Barrow SAC or potential flood risk assessment recommendations. We acknowledge the SEA recommendation that this draft RPO be removed.

Biodiversity considerations

We support the SEA recommendations proposed in relation to the new RPO on developing guidance on riparian setback distances (page 68).

In relation to the proposed new RPO to develop regional-scale open space and recreational facilities (page 89), we recommend that opportunities to protect, maintain and enhance ecological corridors should also be considered as part of such initiatives. Options to support the All-Ireland Pollinator Plan could also be incorporated as appropriate.

Transport

We welcome the recommendation that SEA and AA be considered for the proposed regional freight transport strategy.

In relation to RPO 8.16 (improve cycle access to Dublin Airport and surrounding locations), we support the recommendation to prepare a mobility management plan. This would help inform and coordinate future developments in adjacent land use plans.

Sustainable Development

In considering the Amendments, you should ensure that the RSES, as amended, is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the RSES.

Additionally, you should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

You should also ensure that the RSES is consistent with key relevant higher level plans and programmes.

Future Modifications to the RSES

Where further changes to the Draft RSES are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. They should be subject to the same method of assessment applied in the “environmental assessment” of the Draft RSES / Amendments.

SEA Statement – “Information on the Decision”

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

- 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.

A copy of the SEA Statement with the above information should be sent 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
- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment
- where it appears to the competent authority that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht
- 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.

If you have any queries or need further information in relation to this submission, please contact me directly. I would also be grateful if you could send an email confirming receipt of this submission to: [REDACTED]

Yours Sincerely,



Cian O'Mahony
SEA Section
Office of Evidence and Assessment