



Our Ref: **G Pre00145/2018**

*(Please quote in all related correspondence)*

12 April 2019  
Eastern & Midland Regional Assembly  
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Ballymun Civic Centre  
Main Street  
Ballymun  
Dublin  
D09 C8P5

Via email: [rses@emra.ie](mailto:rses@emra.ie)

**Re: Consultation on Proposed Material Alterations – Regional Spatial & Economic Strategy (RSES) for the Eastern & Midlands Region**

A chara

On behalf of the Department of Culture, Heritage and the Gaeltacht, I refer to correspondence received in connection with the above.

Outlined below are heritage-related observations/recommendations of the Department under the stated heading(s).

**Nature Conservation**

The following observations are made by the Department in its role as a prescribed body under planning legislation and as the authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives). The observations are not exhaustive and are offered to assist EMRA in meeting its obligations and commitments in relation to nature conservation, European sites, biodiversity and environmental protection in the context of the plan and its implementation, and in relation to environmental assessment.

The SEA/AA/FRA Screening of Proposed Material Amendments to Draft RSES identifies consequences of the proposed material amendments to Regional Policy Objectives (RPOs) in the Draft RSES. The Department recommends the implementation in full of the recommendations in this report.

However, material amendments have also been made to the other areas of the Draft RSES and the impacts of these material amendments on the environment must also be assessed in full. In particular, the Department also wishes to make the following observations:





### Section 3.2(8) Growth Enablers (for the Gateway Region)

It is proposed to include point 5 as follows:

*'Diversification and specialisation of local economies including sustainable farming and food production, tourism, marine, energy and renewables, bio economy and circular economy, with a focus on publicly owned peatlands in the midlands, to support a managed transition and realise the benefits of green technologies.'*

The impacts of this policy in relation to publicly owned peatlands must be subject to assessment as part of the AA, SEA and FRA. Cumulative impacts must be considered given the emerging development pressures on non-designated peatlands including the harvesting of peat for use as animal bedding. This growth enabler should comply with the objectives of the National Peatlands Strategy. General principle NPS2 in this Strategy states that the potential economic, environmental and social benefits and costs of peatland uses will be considered and applied to policy and landuse decisions. Such analysis should take place in relation to the above Growth Enabler.

Corridors of suitable peatland habitat may need to be established to ensure the long-term survival of typical fauna, such as Red Grouse, on designated peatland sites. The growth enabler must also be examined in relation to its compatibility with Article 10 of the Habitats Directive which states *'Member States shall endeavour, where they consider it necessary, in their land-use planning and development policies and, in particular, with a view to improving the ecological coherence of the Natura 2000 network, to encourage the management of features of the landscape which are of major importance for wild fauna and flora. Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.'*

### Section 4.3 Item 62 - New RPO – Graiguecullen – Carlow

The proposed new RPO is: 'Support development of underused lands along the River Barrow.'

The Department is in agreement with the screening assessment in the Environmental Reports document that this policy has significant potential for direct and indirect negative impacts for biodiversity, flora and fauna, taking into account the findings of the SEA ER, the NIR and FRA. The Department notes that a significant portion of the lands are within an SAC and underlines the need to protect such sites. A large part of these lands have been zoned amenity and open space in the Joint Spatial Plan for the Greater Carlow Graiguecullen Urban Area 2012 – 2018 and the Department agrees with the recommendation in the Strategic Flood Risk Assessment that this zoning should be maintained to retain existing floodplain areas. Based on the conclusions of the environmental assessments undertaken, the Department supports the recommendation in the Environmental Reports document that this RPO should not be included in the RSES.



Section 5.8 Item 76. New Guiding Principles for the location of strategic employment.

It is recommended that the following amendment (in bold) be made:

*Suitable locations (depending on the extent to which an enterprise is people or space intensive **or subject to environment constraints**)*

Amend RPO 6.16 – Natural and Cultural Tourism Assets

It is recommended that the following amendment (in bold) be made:

*Support the maintenance of, and enhanced access to state lands such as National Parks, Forest Parks, Waterways, etc., together with Monuments and Historic Properties, for recreation and tourism purposes. Access should be planned and managed in a **sustainable** manner that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism.*

Also, it is not clear why there is an apparent reference to Monuments and Historic Properties in the ownership of the OPW when many such assets are in the ownership of a variety of state and semi-state organisations, including this Department.

Section 7.6 Green and Blue Infrastructure

The inclusion of a number of these proposed greenways as Heritage Assets may be premature and misleading given that they have yet to go through the planning process including associated environmental assessments. It is suggested that such proposed, and not yet existing greenways, are clearly demarcated as such.

You are requested to send further communications to this Department's Development Applications Unit (DAU) at [REDACTED] (team monitored); if this is not possible, correspondence may alternatively be sent to:

The Manager

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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Joanne Lyons  
Development Applications Unit