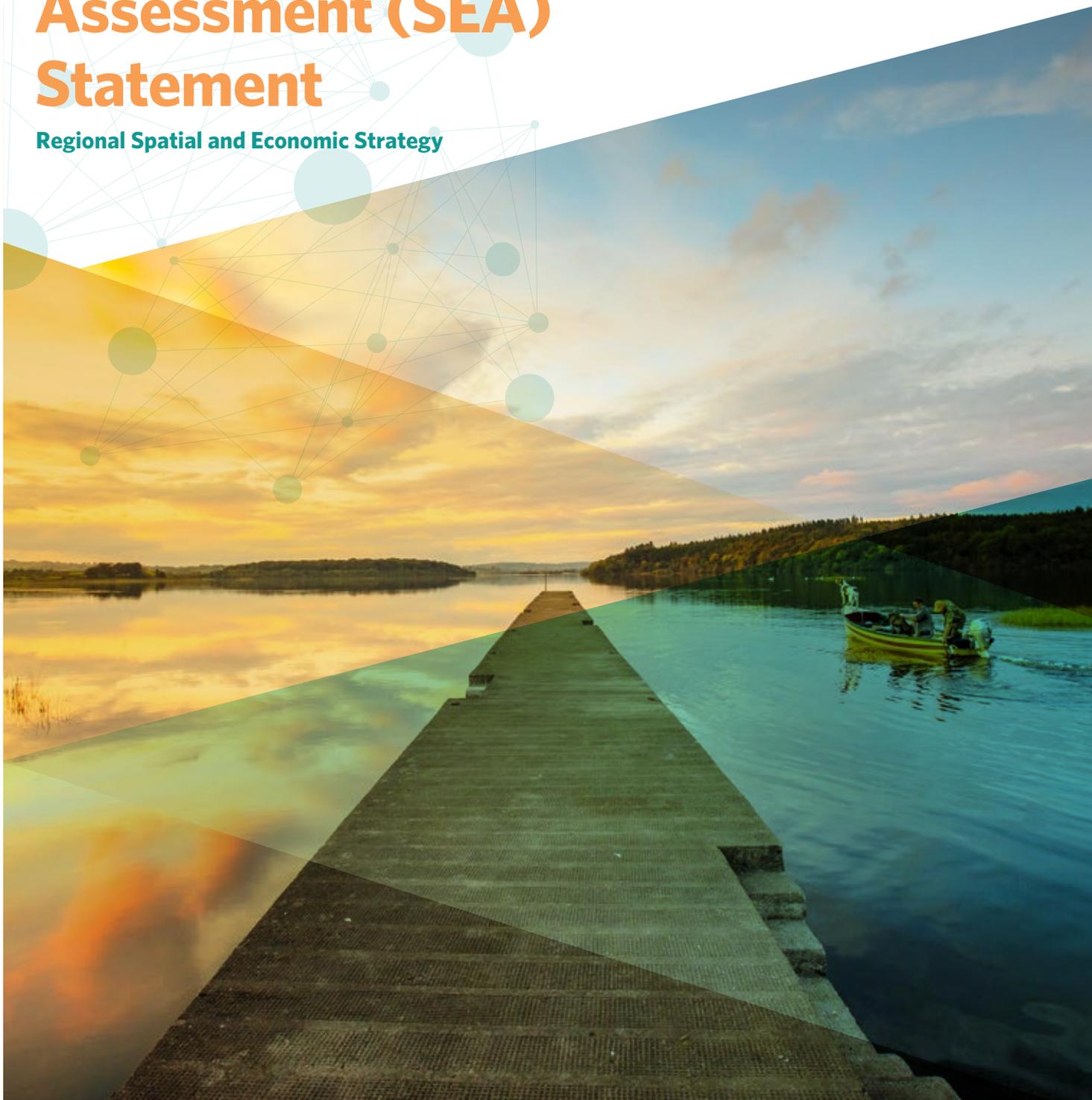


Eastern & Midland Regional Assembly

# Strategic Environmental Assessment (SEA) Statement

Regional Spatial and Economic Strategy



Tionscadal Éireann  
Project Ireland  
2040



Tionól Reigiúnach Oirthir agus Lár-Tíre  
Eastern and Midland Regional Assembly

## Contents

<b>1</b>	<b>INTRODUCTION .....</b>	<b>1</b>
<b>2</b>	<b>SUMMARY OF KEY FACTS .....</b>	<b>2</b>
<b>3</b>	<b>SUMMARY OF SEA PROCESS AND WORK TO DATE.....</b>	<b>3</b>
3.1	Key Stages in the RSES Process .....	3
3.2	Screening .....	3
3.3	Scoping and Statutory Consultation.....	4
3.4	Environmental Assessment and Environmental Report .....	5
3.4.1	Summary of Assessment.....	5
3.4.2	Statutory Consultation on the Draft Plan and SEA Documentation.....	10
3.5	SEA Statement.....	11
3.6	Appropriate Assessment .....	11
3.7	Adoption of the Eastern & Midland Regional Spatial and Economic Strategy.....	11
<b>4</b>	<b>INTEGRATION OF THE SEA PROCESS .....</b>	<b>12</b>
4.1	How Environmental Considerations have been Implemented .....	12
4.2	Integration of Environmental Report .....	13
<b>5</b>	<b>INFLUENCE OF SUBMISSIONS AND OBSERVATIONS ON THE FINAL RSES .....</b>	<b>14</b>
5.1	EMRA Issues Paper .....	14
5.2	Scoping Phase .....	14
5.3	Key Issues Raised in Public Consultation on the Draft RSES.....	25
5.3.1	Statutory Submissions on the Draft RSES .....	25
5.3.2	Transboundary Submissions on the Draft RSES .....	34
5.3.3	Other Environmental Submissions on the Draft RSES.....	36
5.4	Key Issues Raised in Public Consultation on the Material Amendments to the Draft RSES .....	44
5.4.1	Submissions from Statutory Consultees.....	45
5.4.2	Transboundary Submissions .....	50
5.4.3	Other Environmental Submissions .....	51
<b>6</b>	<b>PREFERRED SCENARIO AND REASONS FOR CHOOSING .....</b>	<b>53</b>
6.1	Introduction.....	53
6.2	Approach to Alternatives for the Draft RSES .....	53
6.2.1	Spatial Based Alternatives.....	54
6.2.2	Climate Based Scenarios .....	58
6.2.3	Economic Based Scenarios.....	60
6.3	Policy Alternatives .....	61
6.3.1	Resource Efficiency and Circular Economy .....	61
6.3.2	Key Regional Infrastructure .....	62
6.3.3	Natural Capital .....	63
6.3.4	Energy Alternatives.....	64
6.3.5	Transport Alternatives.....	65
6.4	Preferred Alternative and Reasons for Choosing .....	65
<b>7</b>	<b>MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE ADOPTED RSES .....</b>	<b>66</b>
7.1	Introduction.....	66
7.2	Responsibility for Monitoring .....	66
7.3	Sources of Information for Monitoring.....	66
<b>8</b>	<b>CONCLUSIONS AND NEXT STEPS.....</b>	<b>71</b>
<b>9</b>	<b>ADDENDUM TO THE ENVIRONMENTAL REPORT.....</b>	<b>72</b>
9.1	Introduction.....	72
9.2	Amendments by Chapter .....	72

9.2.1	Non-technical Summary .....	72
9.2.2	Chapter 4 (Other Plans and Programmes).....	72
9.2.3	Chapter 5 (Characteristics of the Current State of the Environment - Baseline).....	73
9.2.4	Chapter 8 (Assessment of Preferred Scenario).....	76
9.2.5	Chapter 10 (Mitigation and Monitoring) .....	76

## Tables

Table 3.1: Key Stages in the Plan and Consultation Process .....	3
Table 3.2: Consultees in SEA Scoping.....	4
Table 3.3: Strategic Environmental Objectives .....	5
Table 3.4: Summary of Measures and Assessment.....	8
Table 4.1: How Environmental Considerations Have Been Taken into Account in the RSES.....	12
Table 5.1: Summary of Themes Raised in Submissions on the EMRA Issues Paper .....	14
Table 5.2: Summary of Issues Raised during SEA Scoping .....	16
Table 5.3: Draft RSES - Summary of Submissions from the Statutory Consultees .....	26
Table 5.4: Draft RSES - Summary of Transboundary Submissions .....	34
Table 5.5: Draft RSES - Summary of Key Environmental Issues for the SEA, AA and RFRA .....	36
Table 5.6: Draft RSES - Summary of Other Key Environmental Issues .....	38
Table 5.7: Material Amendments - Summary of Environmental Issues from the Statutory Consultees .....	45
Table 5.8: Material Amendments - Summary of Environmental Issues from Transboundary Submissions .....	50
Table 5.9: Material Amendments - Summary of Environmental Issues from Other Submissions .....	51
Table 6.1: Alternatives Discussed for the draft Eastern and Midland RSES.....	54
Table 7.1: Environmental Monitoring Programme.....	67

## Appendices

Appendix A	Environmental Mitigation Measures and how these have been addressed in the RSES
Appendix B	SEA/ AA/ RFRA Assessment of the Proposed Material Amendments to Draft RSES

# 1 INTRODUCTION

The Eastern and Midland Regional Assembly (EMRA) is currently preparing a Regional Spatial and Economic Strategy 2019-2031 (hereafter referred to as the RSES), which will provide context for planning and development in the region for the next 12 years (with review periods every six years) and beyond. The RSES is prepared and adopted in accordance with the provisions of the Planning and Development Act 2000 (as amended). The main statutory purpose of the RSES is to support the implementation of *Project Ireland 2040 – the National Planning Framework* (hereafter referred to as the NPF), and the economic policies and objectives of the Government by providing a long-term strategic planning and economic framework for the development of the region. The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy, objective and target responses.

This Strategic Environmental Assessment (SEA) Statement has been prepared as part of the statutory SEA process which has been carried out on the RSES in accordance with the relevant national and EU legislation. This document records how environmental considerations have been integrated into the RSES. Furthermore it summarises how the SEA environmental report, submissions and observations made to the competent authority from the public and designated statutory consultees; and any transboundary consultations have been taken into account during the preparation of the RSES.

This SEA Statement has been prepared in accordance with Article 15G of the Planning and Development (Strategic Environmental Assessment) Regulations (S.I. No. 436 of 2004), having regard to Article 8 (Decision Making) of EU Directive 2001/42/EC on Strategic Environmental Assessment and Circular Letter PL 9/2013, Department of Environment, Community and Local Government and also having regard to the requirements under Article 24 and 25 of the Planning and Development Act 2000, as amended, in relation to making of a RSES..

The structure of the SEA Statement is as follows:

- Introduction;
- Summary of key facts;
- Summary of the SEA process;
- Integration of SEA process;
- Preferred scenario and reasons for choosing;
- Screening and Assessment of changes to the final plan
- Measures to monitor significant environmental effects of the implementation of the adopted RSES;
- Conclusions and next steps; and
- Addendum to Environmental Report.

In addition to the SEA of the RSES, Appropriate Assessment (AA) and Regional Flood Risk Assessment (RFRA) have also been undertaken on the RSES. Where relevant these processes are referred to in the SEA Statement to facilitate a rounded understanding of how environmental issues have been integrated in the final RSES. Separate documentation recording these assessments is available on the EMRA website [<https://emra.ie/>].

## 2 SUMMARY OF KEY FACTS

<b>Title of Plan:</b>	Eastern and Midlands Regional Spatial and Economic Strategy
<b>Purpose of Plan:</b>	The main statutory purpose of the RSES is to support the implementation of Project Ireland 2040 – the National Planning Framework (NPF), and the economic policies and objectives of Government by providing a long-term strategic planning and economic framework for the development of the region.
<b>Competent Authority:</b>	Eastern and Midland Regional Assembly (EMRA)
<b>Period Covered:</b>	The plan provides context for planning development over the period 2019-2031, and beyond. It is acknowledged that the plan will be periodically reviewed and updated approximately every 6 years.
<b>Area Covered:</b>	The RSES covers the Eastern and Midland Region, which comprises nine counties/twelve local authorities, including: the four Dublin local authorities of Dublin City, Dún Laoghaire-Rathdown, Fingal and South Dublin as well as Kildare, Laois, Longford, Louth, Meath, Offaly, Westmeath and Wicklow. The RSES also incorporates considerations in relation to potential all-Island and transboundary issues.
<b>Nature and Content of the Plan:</b>	<p>The RSES is a strategic plan which identifies regional assets, opportunities and pressures and provides appropriate policy, objective and target responses.</p> <p>The Regional Assembly will bring forward the NPF in a manner which best reflects the challenges and opportunities of the region. The RSES seeks to determine at regional scale how best to achieve the shared goals set out in the National Strategic Outcomes (NSOs) of the NPF. To this end, RSES sets out 16 Regional Strategic Outcomes (RSOs), which are aligned with international, EU and national policy and which in turn set the framework for City and County Development Plans. The RSES can assist Local Authorities in aligning with EU priorities to leverage funding and partnership opportunities, however it does not give direct effect to any individual projects.</p>
<b>Date Plan Came into Effect:</b>	The Eastern and Midland Regional Assembly at the EMRA meeting on the 3 <sup>rd</sup> May 2019 resolved to make the Regional Spatial and Economic Strategy for the Eastern and Midland Region on the 28th June 2019, in accordance with section 24 (9) of the Planning and Development Act 2000.
<b>Main Contact:</b>	RSES Team, Eastern and Midland Regional Assembly, 3 <sup>rd</sup> Floor Ballymun Civic Centre, Main Street Ballymun, Dublin 9.

### 3 SUMMARY OF SEA PROCESS AND WORK TO DATE

The RSES has been subject to a process of Strategic Environmental Assessment (SEA), as required under the Planning and Development (Strategic Environmental Assessment) Regulations S.I. No. 436 of 2004, as amended by S.I. No. 201 of 2011 and Part 2, Chapter III *Regional Spatial and Economic Strategies* of the Planning and Development Act 2000, as amended. This has included the key steps described in the following sections.

#### 3.1 Key Stages in the RSES Process

In order to provide a detailed summary of the influence of the SEA process on the plan, an overview of the key stages for the plan has been presented in **Table 3.1**.

**Table 3.1: Key Stages in the Plan and Consultation Process**

Stage	Process Milestone	Timeline
<b>Stage 1 Pre-Draft Plan</b>	Background Issues Paper prepared to inform the RSES and made available for public comment.	20 <sup>th</sup> November 2017 – 16 <sup>th</sup> February 2018
	SEA Scoping Report prepared and sent to statutory consultees for SEA for comment. In addition the Scoping Report also available for public comment.	14 <sup>th</sup> December 2018 – 16 <sup>th</sup> February 2018
	Director's Report on the submissions prepared and considered by the Assembly prior to preparing the draft RSES	Q2/Q3 2019
<b>Stage 2 Draft Plan &amp; Environmental Reports</b>	Elected Member meetings to consider draft RSES	19 <sup>th</sup> October 2018
	Public Display of draft RSES, SEA Environmental Report, Natura Impact Report and Regional Flood Risk Assessment	5 <sup>th</sup> November 2018 – 23 <sup>rd</sup> January 2019
	Director's Report on submissions to the draft RSES prepared for the Elected Members	January / February 2019
	Elected Member meetings to consider submissions received on draft RSES and submit valid motions for proposed amendments to the draft RSES	25 <sup>th</sup> February 2019
	Director's Report in response to the above motions prepared	February 2019
	Elected Members at a meeting considered the motions, the Director's Report and recommendations, except where it was superseded by the agreed motions. The members of the Assembly agree to make the RSES subject to the amendments agreed	1 <sup>st</sup> March 2019
<b>Stage 3 Material Amendments</b>	Public display of Material Amendments Report and supporting environmental assessments	15 <sup>th</sup> March – 12 <sup>th</sup> April 2019
	Director's Report on Submissions to the Material Amendments prepared	April / May 2019
	The Eastern and Midland Regional Assembly at the EMRA meeting on the 3 <sup>rd</sup> May 2019 resolved to make the Regional Spatial and Economic Strategy for the Eastern and Midland Region on the 28 <sup>th</sup> June 2019, in accordance with section 24 (9) of the Planning and Development Act 2000.	28 <sup>th</sup> June 2019

#### 3.2 Screening

EMRA determined through SEA Screening that SEA was required for the RSES under S.I. 436 of 2004, as amended, (where the RSES now replace the Regional Planning Guidelines under the Planning and

Development Act (PDA) 2000, as amended). Furthermore, Part 2 Chapter III of the PDA require SEA during the making of the RSES.

### 3.3 Scoping and Statutory Consultation

Scoping was carried out to establish the level of detail appropriate for the Environmental Report. An SEA Scoping Report was prepared and sent to the statutory consultees on 14<sup>th</sup> December 2017, to be used as the basis for statutory consultations. The statutory consultations were undertaken with the statutory consultees for SEA in Ireland, as well as the transboundary environmental authority for Northern Ireland; the consultees contacted are outlined in **Table 3.2**<sup>1</sup>.

**Table 3.2: Consultees in SEA Scoping**

Consultee
Environmental Protection Agency (EPA)
Department of Housing, Planning and Local Government (DHPLG)
Department of Communications, Climate Action and the Environment (DCCAE)
Department of Culture, Heritage and the Gaeltacht (DCHG)
Department of Agriculture, Food and the Marine (DAFM)
Department of Rural & Community Development (DRCD)
Department of Agriculture, Environment and Rural Affairs (DAERA) [Northern Ireland]

A scoping workshop was subsequently held on 13<sup>th</sup> March 2018 at the Dublin City Council Offices in Smithfield, Dublin. This was coordinated for all three Regional Assemblies i.e. Eastern and Midlands, Southern, and Northern and Western. Representatives from all statutory consultees were invited to attend this workshop. The following groups were represented on the day:

- SEA teams for Eastern and Midland, Southern and Northern and Western Regional Assemblies;
- RSES teams for Eastern and Midland, Southern and Northern and Western Regional Assemblies;
- Department of Communications, Climate Action and Environment;
- Inland Fisheries Ireland (IFI); and
- EPA.

Comments made at the workshop (and in subsequent written submissions) from the statutory consultees were taken into account in the preparation of the Environmental Report.

In addition, non-statutory consultation was undertaken with the wider public. The SEA Scoping Report was placed on public display between 14<sup>th</sup> December 2017 and 16<sup>th</sup> February 2018. This paralleled public consultation on EMRA’s Issues Paper which was open for public comment over the same period. All documents are available to view on the EMRA website [<https://emra.ie/>].

All submissions received from statutory and non-statutory consultation were considered in preparation of the Environmental Report. All of the environmental topics listed in the SEA Directive were considered and all were scoped in for the purposes of the assessment.

<sup>1</sup> It is noted that the statutory consultees for SEA in Ireland are identified in SI 436 of 2004 as amended. However this legislation predates more recent Government Department changes and in some cases Departments have split / merged.

## 3.4 Environmental Assessment and Environmental Report

The preparation of an Environmental Report on the likely significant effects on the environment of implementation of the RSES included consideration of:

- The contents and main objectives of the RSES;
- The current state of the environment and evolution of the environment in the absence of the RSES;
- Links between the RSES and other relevant strategies, policies, plans, programmes and environmental protection objectives;
- Environmental characteristics of the area to be affected by the RSES and key environmental problems;
- The likely significant effects on the environment of implementing the RSES (both positive and negative);
- Measures envisaged for the prevention, reduction and as fully as possible offset any significant adverse effects;
- An outline of the reasons for selecting the alternatives chosen; and
- Measures envisaged concerning monitoring of the significant environmental effects of implementation of the RSES.

### 3.4.1 Summary of Assessment

The approach used for the assessment in the SEA was termed an “objectives-led assessment”. In this case, each of the draft RSES policies were tested against defined SEA Strategic Environmental Objectives (see **Table 3.3**) which covered all SEA environmental topics under the relevant SEA legislation, e.g. population, biodiversity, material assets. Draft Strategic Environmental Objectives were included in scoping consultation. A set of ‘Guiding Principles’ for each SEA topic was also outlined. The environmental objectives were based on the current understanding of the key environmental issues having regard to the environmental protection objectives outlined in the main Environmental Report. A matrix format was used for the assessment, which permitted a systematic approach and comparison of alternatives.

**Table 3.3: Strategic Environmental Objectives**

Environmental Component & Guiding Principle	Strategic Environmental Objective
<p><b>BIODIVERSITY FLORA AND FAUNA</b></p> <p><b>Guiding Principle:</b> <i>No net contribution to biodiversity losses or deterioration</i></p>	<ul style="list-style-type: none"> <li>• To preserve, protect, maintain and, where appropriate, enhance the terrestrial, aquatic and soil biodiversity, particularly EU designated sites and protected species.</li> <li>• Ensure no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function.</li> <li>• Safeguard national, regional and local designated sites and supporting features which function as stepping stones for migration, dispersal and genetic exchange of wild species.</li> <li>• Enhance biodiversity regionally in line with the National Biodiversity Strategy and its targets.</li> <li>• To protect, maintain and conserve the regions Natural Capital</li> </ul>
<p><b>POPULATION AND HUMAN HEALTH</b></p> <p><b>Guiding Principle:</b> <i>Improve quality of life for all ages and abilities based on high-quality, serviced, well connected</i></p>	<ul style="list-style-type: none"> <li>• To create an environment where every individual and sector of society can play their part in achieving a more healthy Ireland.</li> <li>• Consolidate growth and limit urban sprawl.</li> <li>• Enhance human health and promote healthy living through access to active travel opportunities, especially walking and cycling.</li> </ul>

Environmental Component & Guiding Principle	Strategic Environmental Objective
<p><i>and sustainable residential, working, educational and recreational environments</i></p>	<ul style="list-style-type: none"> <li>Promote economic growth to encourage retention of working age population.</li> <li>Ensure that existing population and planned growth is matched with the required public infrastructure and the required services.</li> <li>Safeguard the region’s citizens from environment-related pressures and risks to health and well-being.</li> </ul>
<p><b>WATER</b>  <b>Guiding Principle:</b> <i>Protection, improvement and sustainable management of the water resource</i></p>	<ul style="list-style-type: none"> <li>Ensure that the status of water bodies is protected, maintained and improved in line with the requirements of the WFD and MSFD.</li> <li>Ensure that economic growth of the marine resource and its ecosystems are managed sustainably.</li> <li>Ensure water resources are sustainably managed to deliver proposed regional growth targets in the context of existing and projected water supply and wastewater capacity constraints ensuring the protection of receiving environments.</li> <li>Avoid inappropriate development in areas at risk of flooding and areas that are vulnerable to current and future erosion, particularly coastal areas.</li> <li>Integrate sustainable water management solutions (such as SuDS, porous surfacing and green roofs) into development proposals.</li> </ul>
<p><b>LAND AND SOILS</b>  <b>Guiding Principle:</b> <i>Ensure the long-term sustainable management of land</i></p>	<ul style="list-style-type: none"> <li>Protect soils against pollution, and prevent degradation of the soil resource.</li> <li>Promote the sustainable use of infill and brownfield sites over the use of greenfield within the region.</li> <li>Safeguard areas of prime agricultural land and designated geological sites.</li> </ul>
<p><b>AIR Quality</b>  <b>Guiding Principle:</b> <i>Support clean air policies that reduce the impact of air pollution on the environment and public health</i></p>	<ul style="list-style-type: none"> <li>To avoid, prevent or reduce harmful effects on human health and the environment as a whole resulting from emissions to air from all sectors with particular reference to emissions from transport, residential heating, industry and agriculture.</li> <li>Maintain and promote continuing improvement in air quality through the reduction of emissions and promotion of renewable energy and energy efficiency.</li> <li>Promote continuing improvement in air quality.</li> <li>Reduction of emissions of sulphur dioxide, nitrogen oxides, volatile organic compounds, ammonia and fine particulate matter which are responsible for acidification, eutrophication and ground-level ozone pollution</li> <li>Meet Air Quality Directive standards for the protection of human health — Air Quality Directive</li> <li>Significantly decrease noise pollution by 2020 and move closer to WHO recommended levels.</li> </ul>
<p><b>CLIMATE</b>  <b>Guiding Principle:</b> <i>Achieving transition to a competitive, low carbon, climate-resilient economy that is cognisant of environmental impacts.</i></p>	<ul style="list-style-type: none"> <li>To minimise emissions of greenhouse gasses.</li> <li>Integrate sustainable design solutions into the region’s infrastructure (e.g. energy efficient buildings; green infrastructure).</li> <li>Contribute towards the reduction of greenhouse gas emissions in line with national targets.</li> <li>Promote development resilient to the effects of climate change.</li> </ul>

Environmental Component & Guiding Principle	Strategic Environmental Objective
<p><b>MATERIAL ASSETS</b>  <i>Guiding Principle: Sustainable and efficient use of natural resources</i></p>	<ul style="list-style-type: none"> <li>• Promote the use of renewable energy, energy efficient development and increased use of public transport.</li> <li>• Optimise existing infrastructure and provide new infrastructure to match population distribution proposals in the region.</li> <li>• Ensure access to affordable, reliable, sustainable and modern energy for all which encourages a broad energy generation mix to ensure security of supply – wind, wave solar, tidal, biomass, EfW [Energy from Waste], and traditional fossil fuels.</li> <li>• Promote the circular economy, reduce waste, and increase energy efficiencies.</li> <li>• Ensure there is adequate sewerage and drainage infrastructure in place to support new development.</li> <li>• Promote the circular economy, reduce waste, and increase energy efficiencies.</li> <li>• Reduce the energy demand from the transport sector and support moves to electrification of road and rail transport modes.</li> <li>• Encourage the transition to a zero-carbon economy by developing grid infrastructure to support renewables (onshore and offshore), and international connectivity.</li> <li>• Reduce the average energy consumption per capita including promoting energy efficient buildings, retrofitting, smart- buildings, cities and grids.</li> </ul>
<p><b>CULTURAL HERITAGE</b>  <i>Guiding Principle: Safeguard cultural heritage features and their settings through responsible design and positioning of development.</i></p>	<ul style="list-style-type: none"> <li>• Protect places, features, buildings and landscapes of cultural, archaeological or architectural heritage</li> </ul>
<p><b>LANDSCAPE</b>  <i>Guiding Principle: Protect and enhance the landscape character</i></p>	<ul style="list-style-type: none"> <li>• To provide a framework for identification, assessment, protection, management and planning of landscapes having regard to the European Landscape Convention.</li> </ul>

The focus of the RSES is on sustainable regional land use planning, economic strategy/ investment, metropolitan plan for Dublin, looking to 2031 and beyond, and a 2040 horizon to support the implementation of the NPF. Many of the policy objectives under consideration are expected to bring about positive impacts for population dynamics and material assets as a result, as the objectives proposed emphasise coordinated spatial planning, balanced growth and consolidation/ densification of existing built-up areas, both urban and rural. Consolidation will also bring positive cumulative impacts to air quality and climate from increased sustainable transport access. However, there is also potential for negative impacts in the wider environment as a result of implementation of the RSES policies, particularly where infrastructure cannot keep pace with the growth projected in the cities and towns of Ireland. The potential negative effects relate to loss of habitat and disturbance of species from land use changes, deterioration of air quality and increases in emissions if sufficient public transport options are not in place, deterioration in water quality where adequate treatment is not available in advance or in parallel to proposed growth, loss and deterioration of soil quality among others. The assessment of policies and related policy actions which are set out in the plan are summarised in **Table 3.4**.

**Table 3.4: Summary of Measures and Assessment**

Reference	Summary of Measures and Assessment	Mitigation Proposed by SEA?
Chapter 2: Strategic Vision	Sets out 16 Regional Strategic Outcomes (RSOs), which are intended to align with international, EU and national policy and set the framework for City and County Development Plans. Broadly the RSO's point to a prioritisation of compact growth with a view to developing healthy attractive places for communities; climate action grounded in sustainable development and the circular economy; and economic opportunity which enhances both inter-national and intra-national connectivity. Broadly positive for population and material assets through focus on consolidation, but other environmental pressures likely to arise at the regional level from population and economic growth.	✓
Chapter 3: Growth Strategy	Chapter sets out the policy background by drawing from European-level spatial planning policies and the theme of polycentrism, where one or more socio-economic centres can act as engines that drive regional growth; this chapter sets out the settlement hierarchy for the region, which outlines the key locations for targeting development and growth.	✓
Chapter 4: People and Places	This chapter sets out guidance for the future direction of growth and investment by putting forward a settlement hierarchy and the identification of key growth areas in the Region that will see significant development up to 2036 and beyond. Key environmental issues relate to flood risk within and adjacent to existing settlements targeted for growth, proximity to designated sites (European and national sites), water quality, and infrastructure capacity issues, such as adequate wastewater treatment to service growing populations.	✓
Chapter 5: Dublin Metropolitan Area Strategic Plan [MASP]	The MASP has been prepared by EMRA in collaboration with local authorities, public transport and infrastructure providers as part of a wider Technical Working Group, in order to support the implementation of relevant City and County Development Plans towards the delivery of population and housing as set out in the RSES. In assessing the MASP objectives in Chapter 5, it is apparent considered that a separate and dedicated MASP is warranted to address the detail and complexity of the issues arising for the Dublin Metropolitan Area and it is the recommendation of the SEA and AA that the MASP is developed into a standalone plan.	✓
Chapter 6: Economy and Employment	Sets out the economic strategy for the region with the aim of providing the conditions and direction necessary for the Region to utilise and optimise its assets in pursuit of the maximum progress possible. The focus is on job growth, retail development, improvement of town centres, supporting the Dublin-Belfast Economic Corridor and key transport networks. These policy objectives are positive economically for the region, and it is recognised that a coordinated and balanced approach is required in planning, development of transport and energy infrastructure and water services to accompany job growth and associated population growth in the region. Regeneration of towns and support of retail strategies etc. is also positive for the built environment, however cumulative negative impacts on the receiving environment arising from approvals for development in towns and rural areas.	✓
Chapter 7: Environment	Chapter outlines a number of key Regional Strategic Outcomes which include: the need to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection; to identify protect and enhance green infrastructure; to ensure the sustainable management of our natural resources; to build climate resilience and support the transition to a low carbon economy by 2050. Policies broadly positive for environmental receptors in terms of recognising the importance of transboundary effects and the need for collaboration, managing and sustaining coastal character, working with stakeholders, enhancing/protecting natural and built heritage, and supporting environmental data collection. Incorporating policies on improving water quality, supporting biodiversity in the region, and	✓

Reference	Summary of Measures and Assessment	Mitigation Proposed by SEA?
	<p>consideration of flood risk management are all positive for environmental receptors. The assessment flags the need to further support coastal zone management, supporting the development of further guidance, the need for site selection studies for coastal developments and further clarification on noise and lighting issues in the region. Development is recommended to be delivered on a phased basis to match growth demands while being cognisant of environmental sensitivities and carrying capacities, as well as the land area to accommodate such growth. Agriculture is also recognised as the largest user of land in the country, as such ecosystem services and integrated sustainable land use (including peatland) management provisions in land use plans are required, also having regard to required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.</p> <p>Policies supporting blueways and greenways are broadly positive from health, tourism and ecosystem connectivity aspects. Environmental assessments are recommended for all proposed development within or proximate to designated sites and other ecologically-sensitive areas. Facilitating landscape character protection and supporting the preparation of a Regional Landscape Character Assessment is positive.</p>	
Chapter 8: Connectivity	Sets out the transport policy which applies to the EMRA area, the key principles for the integration of land use and transport, and the transport investment objectives for the EMRA area over the period of this RSES. Furthermore it is one of the sectors with the most significant contribution to national GHG emissions and is therefore a key focus to achieve a transition to a low carbon society. Policies focusing on co-location of residential and employment development with sustainable transport options, as well as those prioritising walking and cycling as a first principle along with public transport are broadly positive across environmental receptors. The construction and operation of any linear transport option has inherent potential for negative impacts on a number of environmental receptors, and can give rise to loss of greenfield, floodplains, disturbance to natural and built heritage features, as well as emissions to air, soil and water. Port and harbour expansion needs to be cognisant of a number of environmental sensitivities, particularly given the proximity of ports with and adjacent to numerous coastal nature designations. The strategic function of Dublin Airport is supported by the RSES, with the assessment noting the impacts of emissions to air and from noise.	✓
Chapter 9: Quality of Life	This chapter outlines guiding principles for the creation of healthy and attractive places, availability of and access to services within the region, and recognises that changing demographics will require a planning response to ensure positive health outcomes for all age groups. Broadly positive effects from policies which aim to contribute to development of communities which recognise the differing community needs and which promote social inclusion. Increasing urban densities to facilitate service provision and prioritisation of brownfield development in existing settlements over greenfield is broadly positive, particularly for MA, LandS and P, material assets, landscape and population, noting however that, as with any regeneration of brownfield, there is risk of pollution and contamination to the environment as a result of mobilisation of contaminants and indirect negative impacts for human health, water, biodiversity, soils and cultural heritage.	✓
Chapter 10: Infrastructure	Chapter outlines the requirements for the provision of services and infrastructure in a plan-led manner to ensure that there is adequate capacity to support future development. States that high-quality infrastructure is an important element of a modern society and economy, and covers water and waste management, energy, and communications networks. Chapter also covers the RSES's approach to addressing climate change and policies such as identifying sectoral emissions and compiling regional baseline data. A number of mitigation measures have already	✓

Reference	Summary of Measures and Assessment	Mitigation Proposed by SEA?
	been incorporated a part of the RSES, with the assessment also recommending support for a bioeconomy feasibility study at regional level and development of guidelines to support local authorities with their local climate action strategies.	
Chapter 11: All Island Cohesion	This Chapter recognises the strong relationship between the Republic of Ireland and Northern Ireland and identifies the need for collaboration and cooperation to maintain these strong connections in light of border uncertainties surrounding the approach of Brexit.	✓
Chapter 12: Implementation and Monitoring	Covers the approach to implementing the RSES, stating it requires streamlined governance arrangements and focused public capital investment priorities. The inclusion of implementation and monitoring objectives is broadly positive for all environmental receptors as it provides opportunities to audit effectiveness of objectives and to establish unforeseen impacts from the wide policy base, with recommendations provided on baseline update cycles to coincide with national reporting, commitments to corrective actions for unforeseen impacts and references to the SEA monitoring programme.	✓

### 3.4.2 Statutory Consultation on the Draft Plan and SEA Documentation

The draft Eastern and Midland Regional Spatial and Economic Strategy was published for consultation on 5<sup>th</sup> November 2018 alongside the SEA Environmental Report, the Appropriate Assessment (AA) Natura Impact Report (NIR) and the Regional Flood Risk Assessment (RFRA) Report. All documents were available for inspection and for download at <https://emra.ie/regional-strategies/>. Submissions and observations on the draft RSES and associated environmental reports were invited prior to finalisation of the RSES to inform the final plan to be adopted. The deadline for receipt of submissions was 23<sup>rd</sup> January 2019. A total of 316 responses were received from a wide range of stakeholders and interested parties, including government departments, professional bodies, industry bodies/chambers of commerce, community and voluntary groups, local government and other interested parties. Further details of the key environmental issues raised are presented in **Chapter 5** of this SEA Statement.

The submissions received were reviewed and responded to in the Director's Report and a series of proposed amendments were recommended. The Elected Members, having considered the draft RSES and the Director's Report on submissions received, resolved at an Assembly meeting to amend the draft RSES. As the proposed amendments constituted a material alteration to the draft Plan, the proposed amendments were put on public display for a period of four weeks in a document entitled *Proposed Material Amendments to the Draft RSES* from 15<sup>th</sup> March to 12<sup>th</sup> April 2019. SEA, AA and RFRA screening and assessment was undertaken on the proposed material amendments to the draft RSES and published alongside the Proposed Amendments Report as an Addendum Report titled *Environmental Reports*.

There were 106 submissions received during the Proposed Material Amendments consultation period. The key environmental issues outlined within the submissions received have been summarised in **Chapter 5** of this SEA Statement. Under the Planning and Development Act 2000 (as amended), the final (third) phase of public consultation is solely limited to the Proposed Material Amendments to the Draft Plan. The submissions received were reviewed and responded to in a further Director's Report and a series of recommendations in relation to the Proposed Material Amendments [accept or reject] were made. These recommendations were further considered by the Elected Members. The Eastern and Midland Regional Assembly at the EMRA meeting on the 3<sup>rd</sup> May 2019 resolved to make the Regional Spatial and Economic Strategy for the Eastern and Midland Region on the 28<sup>th</sup> June 2019, in accordance with section 24 (9) of the Planning and Development Act 2000.

### 3.5 SEA Statement

In accordance with Article 13I of S.I. 436 of 2004, as amended, the Competent Authority is required to prepare a statement summarising:

- a) *How environmental considerations have been integrated into the plan;*
- b) *How (i) the environmental report, prepared pursuant to article 13C, (ii) submissions and observations made to the planning authority in response to a notice under article 12(1) or (7) of the Act and (iii) any consultations under article 13F have been taken into account during the preparation of the plan;*
- c) *The reasons for choosing the plan, as adopted, in light of other reasonable alternatives dealt with, and;*
- d) *The measures decided upon to monitor, in accordance with article 13, the significant environmental effects of implementation of the plan.*

The main purpose of this SEA Statement is to provide information on the decision-making process in order to illustrate how decisions were taken, making the process more transparent. The SEA Statement also provides information on the arrangements put in place for monitoring. The SEA Statement will be available to the public along with the adopted Eastern and Midland RSES.

### 3.6 Appropriate Assessment

In addition to the SEA, there is a requirement under the EU Habitats Directive (92/43/EEC) (as transcribed into Irish law) to assess whether the RSES, individually or in combination with other plans or projects, is likely to have significant effect on a European site, which includes Special Protection Areas (SPAs) and Special Areas of Conservation (SACs), in view of the site's conservation objectives. The requirement for an assessment derives from Article 6 of the directive, and in particular Article 6(3) which requires that:

*“Any plan or project not directly connected with or necessary to the conservation of a site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”*

In recognition of this, an Appropriate Assessment (AA) Screening was carried out, in parallel with the SEA process. From this it was determined that AA was required and a Natura Impact Report (NIR) was prepared to inform an AA.

The Appropriate Assessment took a precautionary approach and assessed the general impacts that would be anticipated from the RSES providing the necessary inclusion of mitigation measures and guiding principles at the strategic level of the plan. As a precautionary approach, the RSES included environmental protection criteria which require avoidance of European Sites in the first instance and reiterated the legislative requirement for AA screening and full AA where potential for effects exists.

The NIR and EMRA's AA determination are available under separate cover.

### 3.7 Adoption of the Eastern & Midland Regional Spatial and Economic Strategy

The Eastern and Midland Regional Assembly at the EMRA meeting on the 3<sup>rd</sup> May 2019 resolved to make the Regional Spatial and Economic Strategy for the Eastern and Midland Region on the 28th June 2019, in accordance with section 24 (9) of the Planning and Development Act 2000.

## 4 INTEGRATION OF THE SEA PROCESS

### 4.1 How Environmental Considerations have been Implemented

The SEA, AA and RFRA processes have been undertaken in parallel to the preparation of the RSES. Thus, from the outset, considerations of the environmental consequences of the policy base have been taken into account. The iterative process ensured that the SEA/AA/RFRA and the preparation of the RSES were integrated in order to meet the environmental objectives and the objectives of the plan. The SEA, AA and RFRA teams were involved in the:

- Development of the alternatives;
- Evolution of policy actions; and
- Recommendation of mitigation measures to address the potential impacts arising.

The SEA, AA and RFRA processes have ensured that potential environmental impacts (both positive and negative) associated with the RSES have been given due consideration in the finalisation of the RSES. **Table 4.1** shows how environmental considerations and the input of the SEA, AA and RFRA have been taken into account in the final RSES.

**Table 4.1: How Environmental Considerations Have Been Taken into Account in the RSES**

Environmental Consideration	Integration into the RSES Process
Early discussion on policy formation	The SEA team engaged directly with the RSES team at an early stage to raise issues and create awareness on key environmental constraints relating to policy alternatives e.g. wastewater limits and assimilative capacity issues with the receiving environment. The SEA introduced the concept of environmental principles to assist in guiding the plan development.
Identification of environmental constraints	The SEA team undertook an audit of baseline environmental conditions with reference to population, human health, climate, air landscape, cultural heritage, biodiversity, flora and fauna, material assets and water. This information was used to focus the SEA objectives, develop alternatives and assess positive and negative impacts associated with the implementation of the proposed RSES. GIS analysis and an Environmental Sensitivity Mapping (ESM) exercise was also undertaken to influence alternatives discussions and assessment of policies.
Assessment of alternatives	The environmental baseline and objectives were used to identify key sensitivities and inform development of the alternatives and ultimately the assessment of the preferred alternative. The SEA team and the planning team liaised on possible alternatives during preparation of the SEA scoping document and subsequently as the RSES evolved through meetings and workshops. GIS analysis and an Environmental Sensitivity Mapping (ESM) exercise was also undertaken to influence alternatives discussions and assessment of policies.
Recommendation of mitigation measures to address impacts on the wider environment	Mitigation measures were proposed to address negative environmental impacts identified during the assessment process. These included amendments to the wording of policies in the RSES and inclusion of new policies to reflect protection of the environment, such as RPOs 3.2 and 3.3.
Required environmental monitoring programme	A monitoring programme was presented in the SEA Environmental Report. This has been amended following consultation and will facilitate the ongoing monitoring of the implementation of the RSES.

Environmental Consideration	Integration into the RSES Process
Consultation	Statutory consultation was undertaken with the environmental consultees for SEA in Ireland in relation to scoping of the Environmental Report. Issues raised were used to inform the overall scope and context of the environmental assessment. Non-statutory public consultation was undertaken at the scoping stage and this stakeholder feedback also helped to shape the environmental assessment. Subsequently, the SEA Environmental Report, the Natura Impact Report (from the Appropriate Assessment process), the Regional Flood Risk Assessment, and the draft RSES were put on wider display on the EMRA website. All changes to policies and actions comprising material amendments to the RSES have been screened/assessed by the SEA, AA and RFRA teams to determine if they would result in significant effects (see <b>Section 4.2</b> and <b>Chapter 5</b> ) prior to finalisation of the RSES.

## 4.2 Integration of Environmental Report

In addition to the influences outlined in **Section 4.1** above, the SEA Environmental Report, the NIR and the RFRA specifically suggested mitigation measures to offset negative impacts identified during the assessment process for the draft RSES. These included general measures such as additional text clarifying obligations in relation to protection of European Sites, additional clarity on the definitions/wording in policies, greater transparency on stakeholders and their role, particularly for the implementation phase as well as specific recommendations and suggestions on how to improve the effectiveness of the plan going forward. It is noted that some of these suggestions were included in the draft plan as part of the iterative process. Others have subsequently been included in the final plan following further consultation with the wider stakeholder base.

The mitigation measures from the SEA, AA and RFRA processes carried out on the draft RSES and how they have influenced the final RSES as adopted are included in **Appendix A**.

## 5 INFLUENCE OF SUBMISSIONS AND OBSERVATIONS ON THE FINAL RSES

This chapter outlines how submissions and observations on the Environmental Report, Natura Impact Report and draft RSES (and any amendments) have been taken into account in the evolution of the strategy.

The reader is advised that the RPO and page number referencing in the tables, as they refer to submissions relate to the draft RSES. The final RSES has been in some cases restructured and renumbered and therefore the response to how the issues have been addressed refer to the structure of the final RSES.

### 5.1 EMRA Issues Paper

As part of the first phase of public consultation, EMRA invited submissions on an *Issues and Choices Paper* and Socio-Economic Baseline Report, between 20<sup>th</sup> November 2017 and 16<sup>th</sup> February 2018, resulting in 171 submissions received. A Director's Report was prepared on the submissions received in relation to this round of public consultation, and all documents are available online on EMRA's website. Submissions covered a number of themes summarised in **Table 5.1**.

In addition, non-statutory consultation was undertaken with the wider public. The SEA Scoping Report was placed on public display between 14<sup>th</sup> December 2017 and 16<sup>th</sup> February 2018. This paralleled public consultation on EMRA's Issues Paper which was open for public comment over the same period. All documents are available to view on EMRA's website at <https://emra.ie/>.

**Table 5.1: Summary of Themes Raised in Submissions on the EMRA Issues Paper**

Theme Raised	Sub-theme
<b>People and Places</b>	<ul style="list-style-type: none"> <li>• Developing a growth and settlement pattern for the region</li> <li>• Urban structure</li> <li>• Rural communities</li> <li>• People's health and wellbeing</li> <li>• Dublin MASP</li> </ul>
<b>Economy and Employment</b>	<ul style="list-style-type: none"> <li>• Dublin as a global capital</li> <li>• Smaller towns, rural economy and urban-rural interaction</li> <li>• Key sectors</li> <li>• Strategic locations, assets and bottlenecks</li> </ul>
<b>Environment and Heritage</b>	<ul style="list-style-type: none"> <li>• Integrated land and marine planning</li> <li>• Sustainable water and flood management</li> <li>• Land use and resource efficiency</li> <li>• Built and natural heritage</li> <li>• Tourism</li> <li>• Strategic Environmental Assessment (SEA)</li> </ul>
<b>Climate and Infrastructure</b>	<ul style="list-style-type: none"> <li>• Transport</li> <li>• Utilities</li> <li>• Energy and climate</li> <li>• Social infrastructure</li> </ul>

### 5.2 Scoping Phase

As outlined in **Section 3.3**, an SEA Scoping Report was prepared and sent to the statutory consultees for SEA for comment on the 14<sup>th</sup> December 2017. As part of the scoping process a joint workshop for all three Regional Assemblies was convened on 13<sup>th</sup> March 2018 at the Dublin City Council Offices in Smithfield. Following the consultation period, written submissions were received from EPA, DCHG, Inland Fisheries Ireland (IFI) and DAERA. The written submissions and comments made during the workshop were taken into consideration in

## REPORT

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compiling the Environmental Report and the draft RSES. The issues raised in the submissions from statutory consultees is presented in **Table 5.2** below.

All submissions received from statutory and non-statutory consultation were considered in preparation of the Environmental Report. All of the environmental topics listed in the SEA Directive were considered and all were scoped in for the purposes of the assessment.

**Table 5.2: Summary of Issues Raised during SEA Scoping**

Statutory Consultee	Summary of Issues Raised
<p><b>EPA</b> <b>General</b></p>	<p><b>General Comments</b></p> <ul style="list-style-type: none"> <li>• Common approach to the SEA process being adopted for all 3 RSESs and participation in workshop welcomed.</li> <li>• Merit in considering adopting a similar standardised approach in preparing the Strategies.</li> <li>• Should be a commitment to the relevant aspects of the 7 Key Actions of Ireland’s Environment which are linked to the 17 UN’s Sustainable Development Goals. Suggest inclusion of these goals in the RSES.</li> <li>• Draft River Basin Management Plan and Cleaning our Air – A National Clean Air Strategy for Ireland (currently being prepared) should be reflected in the environmental commitments in the RSES.</li> <li>• Flood Risk Management Plans currently being finalised should feed in to the RSES.</li> <li>• Need to align the implementation and governance aspects of the RSES with the approach to governance and implementation outlined in NPF.</li> <li>• Need for development of integrated and robust planning enforcement and cooperation mechanisms in association with the DHPLG, relevant Government Departments, and the proposed Office of the Planning Regulator, other Regional Assemblies and local authorities.</li> <li>• RSES has significant potential to contribute to support Ireland’s ambition to become a carbon-neutral, climate-resilient and sustainably competitive society.</li> <li>• A commitment to preparing an RSES Implementation Programme alongside the RSES should be considered including key responsibilities (lead /partner Departments/Authorities etc.), priorities and where appropriate, timescales, alongside each of the objectives/ commitments in the RSES.</li> <li>• Refer to EPA SEA Guidance and information sources in carrying out SEA for consideration.</li> </ul>
<p><b>EPA</b> <b>Appendix I - Comments on the Issues Paper</b></p>	<p><b>Appendix I - Comments on the RSES Issues Paper (General)</b></p> <ul style="list-style-type: none"> <li>• Suggest having regard to key national environmental commitments.</li> </ul> <p><b>Appendix I - Comments on the RSES Issues Paper (Response to Questions)</b></p> <ul style="list-style-type: none"> <li>• A number of plans and strategies suggested for consideration.</li> <li>• EPA annual reports on water quality, drinking water and wastewater detail the status of infrastructure and should be reviewed to determine the areas needing remediation/ increased capacity so as to meet population growth and economic development.</li> <li>• Irish Water’s Tier I and Tier II Plans (Water Services Strategic Plan, Capital Investment Plan, Wastewater sludge management plan, Lead in Drinking Water Mitigation Plan and their National Water Resources Plan should be reviewed with regards to identifying water treatment infrastructure requirements and investment prioritisation are proposed. Also suggest referring to EPA’s Ireland’s Environment - An Assessment 2016, our State of the Environment Report.</li> <li>• Should promote integration of climate related plans at county level (as listed). Merit in the Regional Authority convening a workshop to see how the various sectors within the region can implement and monitor implementation of the measures and policies required to reduce greenhouse gas emissions.</li> <li>• DCCAIE are considering the preparation of an on-line portal to serve as a database of information on climate policies and measures that can be used for Ireland’s EU and UNFCCC reporting purposes.</li> </ul>

Statutory Consultee	Summary of Issues Raised
	<ul style="list-style-type: none"> <li>• In relation to the bio-economy sector, areas of competing land use should be identified early in the process particularly if those areas are marked for expansion or development of bio economy related developments/land uses. A commitment to the bio-energy plan should be given.</li> <li>• In relation to marine and coastal areas a number of plans and strategies should be consulted including draft National River Basin Management Plan for Ireland etc. (as listed).</li> <li>• In relation to regional measures which would ensure the monitoring and implementation of the objectives/policies of the NPF and the RSES there would be merit in considering a database of the various national policy objectives in the NPF and include the related policies/objectives for the region required to advance these national objectives.</li> <li>• A commitment should be included in the RSES for reporting on the ongoing environmental performance of the RSES. This should be published alongside a report of RSES implementation.</li> <li>• Guidance for Integration of Environmental Considerations: separate document provided listing key significant environmental aspects to consider.</li> </ul>
<p><b>EPA Submission</b></p> <p><b>Appendix II – Comments on the Scoping Report</b></p>	<p><b>Appendix II – Comments on the Scoping Report</b></p> <p><b>5.3.1 – Population and Human Health</b></p> <ul style="list-style-type: none"> <li>• There is also merit from a population perspective to include a specific reference to the <i>National Planning Framework</i>.</li> </ul> <p><b>5.3.2 – Biodiversity, Flora and Fauna</b></p> <ul style="list-style-type: none"> <li>• In relation to the Opportunities, bullet 2 “More Coherent protection and enhancement of biodiversity as a whole on a regional and local level”, could also consider including a reference to ‘monitoring’ and ‘management’ also. Could also amend this bullet to “Support national level policies at a regional level to protect and enhance natural heritage assets”.</li> <li>• Opportunities Bullet 7 could also be amended to recognise the opportunity to establish a coordinated regional approach to habitat mapping, ecosystem services and river basin catchment management.</li> </ul> <p><b>5.3.4 – Water</b></p> <ul style="list-style-type: none"> <li>• In relation to Opportunities for the ‘Water’ topic, the wording of bullet 2 should be amended ‘addressing its impacts’ is vague in detail.</li> <li>• Under ‘Challenges’, additional challenges could include:             <ul style="list-style-type: none"> <li>- ensuring leisure activities do no adversely impact on the aquatic environment</li> <li>- dredging and dumping at sea activities should also be considered here</li> </ul> </li> </ul> <p><i>Drinking Water</i></p> <ul style="list-style-type: none"> <li>• Remedial Action List and the Priority Areas (EPA) set out deficiencies for drinking water and wastewater. These priority areas should be taken into consideration in the RSES and the SEA making process.</li> </ul> <p><i>Waste Water</i></p> <ul style="list-style-type: none"> <li>• Consideration in the RSES and the associated environmental assessments of the following:</li> <li>• An assessment carried out by Irish Water on wastewater indicates that many plants are not capable of taking additional capacity as they are not meeting the discharge conditions and this situation will not change in many of them in the near future (i.e. by 2021). If additional development occurs in these areas, it is likely to push the discharge over the licence limits and therefore potentially impact on water quality.</li> </ul>

Statutory Consultee	Summary of Issues Raised
	<ul style="list-style-type: none"> <li>• EPA identified 148 urban areas where improvements in the collection and treatment of waste water are necessary to resolve these six priority issues. The 148 areas are shown on the map at <a href="https://gis.epa.ie/EPAMaps/SewageTreatment">https://gis.epa.ie/EPAMaps/SewageTreatment</a>.</li> <li>• The European Commission is taking Ireland to the Court of Justice of the European Union because of the failure to comply with the requirements of the Urban Waste Water Treatment Directive. It is essential that Ireland improves waste water treatment at non-compliant areas, to ensure that waste water is treated to the required standards.</li> <li>• A lack of treatment capacity may constrain development in some urban areas, until such time as discharges from these areas meet the necessary environmental standards.</li> <li>• Compliance with the requirements of Waste Water Discharge Authorisations is the key to reducing the environment impact of waste water on the receiving environment.</li> </ul> <p><i>5.3.5 Air Quality</i></p> <ul style="list-style-type: none"> <li>• Amending Opportunity Bullet 4 for clarity “Encourage modal shift away from private vehicular transport to more sustainable options, especially in towns and cities”;</li> <li>• Under ‘Challenges’, an additional challenge could relate to ‘emissions from industry’ within the region.</li> </ul> <p><i>Road Transport</i></p> <ul style="list-style-type: none"> <li>• Note road transport is highly fossil fuel dependant which is a key challenge to maintain good air quality. Identifies the need to promote a reduction in travel demands, increase alternatives to private car and improvements in motorised transport and need to promote incentives to move to electric vehicles. Recommend inclusion of commitment to reduce transport related emissions.</li> </ul> <p><i>Noise</i></p> <ul style="list-style-type: none"> <li>• Available Noise Action Plans should be considered and reviewed as required, to reflect the Plan period and associated development proposals.</li> <li>• Consideration should be given to protect, where relevant, any designated quiet areas in open country. Quiet Areas are defined as “an area in open country, substantially unaffected by anthropogenic noise.”</li> <li>• Useful for the RSES to acknowledge and support the need for a National-level Noise Policy/ Strategy.</li> </ul> <p><i>5.3.6 Climatic Factors</i></p> <ul style="list-style-type: none"> <li>• The relevant transport-related actions and measures in the National Mitigation Plan (DCCA, 2017) should be considered and addressed as appropriate in the RSES.</li> <li>• Note obligation to meet 10% transport energy from renewable sources by 2020 and NPF target to reduce carbon dioxide emissions which should be addressed in RSES.</li> <li>• The RSES should consider the impacts on local and regional exposure and vulnerability to weather and climate events, and projected changes to these due to climate change.</li> <li>• Traffic flows, preferred commuter transport mode and associated impact on traffic volume/congestion is strongly influenced by weather conditions, and not just weather extremes, which should also be considered.</li> <li>• The inclusion of commitment to preparation of a Regional Climate Adaptation Strategy should be considered for inclusion in the RSES.</li> </ul>

Statutory Consultee	Summary of Issues Raised
	<p><i>5.3.7 Material Assets</i></p> <ul style="list-style-type: none"> <li>• The first Opportunity bullet could include a reference to modern communications infrastructure.</li> <li>• Refer to national policy on alternative fuels.</li> <li>• Bullet 1 - Plan for settlement to be aligned with required transport, water, energy infrastructure.</li> </ul> <p><i>5.3.9 Landscape</i></p> <ul style="list-style-type: none"> <li>• Opportunity could also include coordination of protection of sensitive and high landscape character areas in inter-county and inter regional context.</li> <li>• Coordinated regional approach should be adopted to identifying and protection, regional LCA's opportunity.</li> <li>• A commitment should be included in the RSES to the preparation Regional Landscape Character Assessment (RLCA).</li> <li>• SEA Environmental Objectives should be set in the context of the environmental objectives set in the NPF to ensure consistency, while also expanding on the regional specific variation and issues/challenges that exist.</li> </ul> <p><i>Table 7.1 – Draft SEA Environmental Objectives</i></p> <ul style="list-style-type: none"> <li>• Under the 'Water' topic, a sub-objective should be included for ensuring the Floods Directive and National CFRAMS programme is implemented, and supporting implementation of relevant actions and measures set out in the final FRMP's once adopted.</li> <li>• Effecting Coastal Zone Management and associated implications for land use zoning should also be considered for inclusion.</li> <li>• Noise considerations should be considered specifically.</li> <li>• In relation to 'Climate', suggest to support and facilitate local authority climatic adaption strategies.</li> <li>• Under 'Landscape', aspects such as protecting streetscapes, seascapes of recognised quality and enhancing provision of and access to green space in urban areas.</li> <li>• In relation to Material Assets (Waste):-             <ul style="list-style-type: none"> <li>○ Opportunity to support RWMP recommendations to establish buffer areas between industrial/commercial areas and residential areas.</li> <li>○ The RSES should also take into consideration the need to provide for adequate separation between sensitive receptors and industrial activities in order to minimise the potential for nuisance issues.</li> </ul> </li> </ul> <p><i>Section 7.3 Outline of Alternatives</i></p> <ul style="list-style-type: none"> <li>• Merit in considering a tiered approach to the consideration of alternatives in the SEA for the RSES, to align with the new national planning hierarchy.</li> <li>• Suggest the convening of alternatives workshops would be useful with key stakeholders participating to inform the development, consideration and environmental appraisal of the RSES options and combinations of RSES options.</li> </ul>
<p><b>DCHG – Comments on SEA Scoping Report</b></p>	<ul style="list-style-type: none"> <li>• Relevance of EPA's Integrated Biodiversity Impact Assessment Practitioner's Manual for integration of biodiversity issues</li> <li>• The scope of the SEA should include data gathering, analysis and assessment of the implications for each of the elements listed, paying particular attention to the likely and realistic effects of the plan.</li> <li>• List of data sources provided, including GIS data.</li> <li>• List of important NPWS publications provided.</li> </ul>

Statutory Consultee	Summary of Issues Raised
	<ul style="list-style-type: none"> <li>• List of relevant SEA Guidance documents provided.</li> <li>• Where a plan requires an appropriate assessment, any changes or alterations of that plan (after the draft plan stage) should be ‘assessed’ rather than ‘screened’.</li> <li>• Strategic Environmental Objectives should be included for all nature conservation sites (not only European sites), protected species, and ecological corridors and stepping stones as outlined in this submission (Appendix 1)</li> <li>• Although MASP is to operate at a strategic level it shall also take into consideration various environmental constraints and challenges in the wider metropolitan areas including but not only European sites and other nature conservation sites. All such land use planning issues have the potential to impact on biodiversity and designated sites and these issues need to be considered in the SEA.</li> <li>• In addition to benefits of heritage and landscape for tourism, employment and economic growth, the strategy should also acknowledge the high quality of the environment associated with nature conservation sites, as well as their international scientific importance and educational values.</li> <li>• Interrelationships between BFF and other topics should be assessed and identify significant effects.</li> <li>• BFF section of SEA should be prepared by or in conjunction with suitably qualified ecologist and other specialists and should have regard for EPA’s Integrated Biodiversity Impact Assessment best practice guidance.</li> <li>• SEOs should refer to international and national environmental objectives. Refer to the National Biodiversity Action Plan 2017- 2021 which seeks to ‘mainstream biodiversity into decision making’ and move towards ‘no net loss to biodiversity’.</li> <li>• Welcome that the biodiversity flora and fauna SEO also covers protected species. Such species, which can be protected under national and/or European legislation, can occur anywhere, including outside of designated sites.</li> <li>• While it may be considered efficient to use monitoring programmes that are already in place and run by other authorities, it is important to establish that these are in fact designed in such a way that they will identify the effects anticipated from the particular strategy in question. As such, it is important to understand the objectives, methodologies, parameters, assumptions, etc. of any existing monitoring programme that is proposed to be used in such a way.</li> <li>• It is advisable to set out clearly where responsibilities for monitoring programmes lie, and their frequency and reporting/publication arrangements, as well as the procedures that will be put in place to ensure that there is a response mechanism to any unforeseen or undesirable negative effects/results, and that remedial action will be taken, if necessary.</li> <li>• Refers to the use of Irish SEA and AA Guidance documentation for use and various ecological data references for use as key sources as part of the process (pages 4 and 5).</li> <li>• Appropriate assessment guidance is included in Appendix 2. Where the NIR/NIS identifies that plan-level mitigation is necessary this must amend and be reflected in the content and objectives of the final strategy wherever necessary. Specific and repeated cross referencing to mitigation measures in other sections or reports may be used but should be done clearly, consistently and unambiguously. Particular attention should be paid to environmental monitoring of previous or related plans where this is producing ‘evidence-based’ monitoring results.</li> <li>• Public authorities are obliged, when exercising their functions, to take appropriate steps to avoid in European sites the deterioration of natural habitats and the habitats of species, as well as disturbance of species for which a site has been designated insofar as this disturbance could be significant in relation to the objectives of the Habitats Directive. Advised to incorporate such obligation into strategy.</li> </ul>

REPORT

Statutory Consultee	Summary of Issues Raised
	<p>Suggest inclusion of the development of systems that will monitor and ensure the compliance of “downstream” projects with these obligations, as well as any internal mechanisms that may be needed to ensure compliance.</p> <ul style="list-style-type: none"> <li>• Integration of Biodiversity, Flora and Fauna, and associated obligations into the Strategy: General provisions described</li> <li>• Key requirements and clarifications concerning Natura Impact Statements: General provisions described</li> <li>• Appropriate Assessment Guidance: General provisions described and list of jurisprudence provided.</li> <li>• Appendix 1: Key elements of biodiversity of relevance to SEA: A list of the key elements of biodiversity, flora and fauna of relevance to SEA is provided.</li> <li>• Appendix 2: Overview of 2013 Article 17 and Article 12 summary data: Presents findings of report on status of Ireland’s Habitats and Species Report which refers to the status of Ireland’s birds, and reports on the implementation of the Habitats and Birds Directives. It also refers to the Department’s Prioritised Action Framework which requires consideration as part of the environmental assessments.</li> </ul>
<p>DCHG - Comments on the Issues Paper</p>	<ul style="list-style-type: none"> <li>• Legislation: The Strategy and SEA should take account of the Biodiversity Convention, the Ramsar Convention, the EC Habitats Directive (Council Directive 92/43/EEC), the EC Birds Directive (Directive 2009/147 EC), the Wildlife Acts of 1976 to 2012, and the European Communities (Birds and Natural Habitats) Regulations 2011 to 2015. The Regional Assembly should also refer to the relevant circular letters which have been circulated to Local Authorities.</li> <li>• Designated Sites: The Strategy should include a natural heritage section and refer to all designated sites within or adjoining the Strategy area, which should be listed and mapped.</li> <li>• Protected Species: The proposed Strategy should recognise that protected species also occur outside designated sites and should ensure the protection of such species.</li> <li>• Biodiversity: The Strategy should be developed to integrate biodiversity considerations in a positive, proactive and precautionary way, and this should be reflected in the text and content of the plan, including its aims, objectives and policies, as well as in maps.</li> <li>• Article 10 of the Habitats Directive: the Strategy should include provisions to encourage the management of features of the landscape which are of major importance to wild fauna and flora.</li> <li>• Pollinators: It is recommended that the natural heritage section of the Strategy should also contain a policy on implementing the All Ireland Pollinator Plan 2015-2020.</li> <li>• Implications of the Strategy for Biodiversity, Flora and Fauna: Plans and programmes may significantly affect nature conservation, biodiversity, flora and fauna in a number of ways, depending on the measures to be included within the Strategy and the methods of implementation.</li> <li>• Cumulative Impacts: When drafting the Strategy, cumulative and in combination effects with existing plans and projects and with known upcoming plans and projects, should be assessed.</li> </ul> <p>Eastern &amp; Midland Region noted to have many areas of nature conservation importance, both designated and undesignated, ecological corridors and stepping stones, and biodiversity in general. The following issues should be considered when drafting the Strategy and carrying out the assessment:</p> <ul style="list-style-type: none"> <li>• Land Use Planning: No areas to be identified or targeted for future development or changes in land use without the availability of basic constraints map.</li> </ul>

Statutory Consultee	Summary of Issues Raised
	<ul style="list-style-type: none"> <li>• Water Services: The provision of water services has the potential to impact on the natural heritage. Such impacts include those on water quality and quantity as well as physical disturbance of habitats and species and habitat loss. Noted that some major projects are currently underway in the Region including plans to pipe water from the River Shannon, for a new waste water treatment plant (WWTP) in north County Dublin, and the upgrading of the Poolbeg WWTP. Consultation is ongoing with DCHG regarding these current proposals</li> <li>• Infrastructure: Broadband/electricity/wind farms/solar farms require the laying of cables, underground or in some cases over ground and other ancillary infrastructure. Overhead cables can also pose a flight hazard to migrating birds and therefore need to be sensitively sited. Laying of cables has the potential to impact on habitats and species through habitat loss and disturbance.</li> <li>• Roads and Rail: Modifications to existing road and rail routes, and the building of any new routes, have potential to impact negatively on biodiversity. Any potential impacts of on-going or proposed road or rail projects should be considered. Key projects include proposed road projects in the Region and an aspiration for the future twin tracking of the rail line both north and south from Dublin with the DART extension involving electrification of part of it. As the rail line runs adjacent to, and in some cases through, European sites, such projects will require appropriate assessment. In addition to loss of annexed habitat there is potential for bird collisions with overhead cables for the DART where it crosses estuaries such as at Malahide and Rogerstown.</li> <li>• Ports and Airports: Any modifications or expansion of ports and airports may impact on biodiversity and designated sites, either directly or indirectly. Projects in the Region which the DCHG has been consulted about include a second runway proposal for Dublin Airport and the implementation of Dublin Port Masterplan</li> <li>• Climate Change, Flooding and CFRAM: Flood barriers such as walls can impact on the structure and function of rivers, including river SACs, and can lead to changes in the patterns of erosion and deposition and the loss of flood plains and associated habitats.</li> <li>• Coastal Protection: Coastal flood protection measures can lead to changes in the erosion and deposition and although considered a natural process and could have implications on sites some distance away should be considered in the Strategy.</li> <li>• Air and Water Quality Including NO<sub>x</sub> Emissions: Air quality including emissions from vehicles (NO<sub>x</sub>) and farms (ammonia) can lead to atmospheric nitrogen deposition resulting in changes in flora and vegetation types.</li> <li>• Tourism and Greenways/ Cycleways, Amenity Parks: The Strategy should address the issue of creating new amenity parks and not rely on using existing natural biodiversity rich areas of countryside and designated sites for amenity purposes. The Strategy should ensure it is compliant with the National Greenway Strategy currently in preparation. Potential impacts of on-going or proposed greenways and similar developments should be considered including the potential for cumulative impacts at both a Regional and a National level including habitat loss and disturbance.</li> <li>• There are many greenways and similar developments or development proposals in the Region, including the Barrow Blueway, the Royal and Grand Canal Greenways, the S 2 S and the Dodder Greenway from source to sea. These all have the potential to impact on European sites habitats and species including habits and species listed on the annexes of the Birds and Habitats Directives</li> <li>• Green Infrastructure: Green Infrastructure should involve creating new green areas in existing built infrastructure and creating a green network. It should not be confused and be interpreted as putting built infrastructure into green areas. Although there is an inter-relationship between natural heritage and green infrastructure</li> <li>• Department recommends that the Strategy should have separate natural heritage/biodiversity and green infrastructure chapters.</li> <li>• Link provided to EU Commission's document on Green Infrastructure (2013)</li> </ul>

## REPORT

Statutory Consultee	Summary of Issues Raised
	<ul style="list-style-type: none"> <li>• It is recommended that the natural heritage section of the Strategy should also contain a policy on implementing the All Ireland Pollinator Plan 2015-2020</li> <li>• When drafting the Strategy, cumulative and in combination effects with existing plans and projects and with known upcoming plans and projects, should be assessed.</li> </ul>
<p><b>Inland Fisheries Ireland</b></p>	<ul style="list-style-type: none"> <li>• RSES must address not only water quality but also include the protection of the physical environment, hydrological processes and biodiversity. Protection of the aquatic environment must imply a greater commitment than merely to prevent fish mortality or protect water quality. Consideration should be given to potential significant impacts on:             <ul style="list-style-type: none"> <li>- Water quality</li> <li>- Aquatic and associated riparian habitats</li> <li>- Biological Diversity</li> <li>- Ecosystem structure and functioning</li> <li>- Fish spawning and nursery areas</li> <li>- Surface water hydrology</li> <li>- Passage of migratory fish</li> <li>- Areas of natural heritage importance including geological heritage sites</li> <li>- Sport and commercial fishing and angling</li> <li>- Amenity and recreational areas</li> </ul> </li> <li>• RSES should:             <ul style="list-style-type: none"> <li>- be consistent with WFD and RBMP</li> <li>- Preclude development where infrastructure is under-capacity.</li> <li>- Support river corridor preservation.</li> <li>- Promote integration of natural watercourses in development proposals and encourage local participation and consultation with IFI.</li> <li>- Support National Strategy for Angling Development</li> <li>- Have regard to IFI Guidelines.</li> </ul> </li> <li>• Protect aquatic environment: RSES...protection of the quality of the aquatic environment...water quality...include the protection of the physical environment, hydrological processes and biodiversity             <ul style="list-style-type: none"> <li>- Maintenance of habitat is a particularly important objective of fisheries authorities, protection of the food chain</li> <li>- WFD - Protection of aquatic ecosystems requires that river systems be protected on a catchment basis and protection and maintenance of physical habitat and hydrological processes and regimes.</li> </ul> </li> <li>• Water Quality &amp; Municipal WWTP Infrastructure: Sufficient treatment capacity must be available both within the receiving sewerage systems locally and downstream of waste water treatment plants over the full duration of the plan in order that the ecological integrity of the ultimate receiving waters is protected.</li> <li>• Capacity must be coupled with an effective sludge management strategy/policy.</li> <li>• Build a comprehensive and robust assessment of both local infrastructural needs and IW/LA capacity to meet those needs into the plan the risk of associated significant environmental impacts which may result from local development.</li> </ul>

## REPORT

Statutory Consultee	Summary of Issues Raised
	<ul style="list-style-type: none"> <li>• Water Quality and Integrated Constructed Wetlands: precautionary approach, from a policy perspective; required by WFD to protect/improve ecological status and water quality of all waters.</li> <li>• Aquatic Habitat Protection (incl. riparian habitat): essential to maintain watercourses in an environmentally and aesthetically sensitive manner               <ul style="list-style-type: none"> <li>- IFI provide guidance on site specific measures to protect riparian and aquatic habitats.</li> <li>- Opposed to development on floodplain lands.</li> </ul> </li> <li>• Invasive Species: policies aimed at ensuring that developments do not spread invasive species.               <ul style="list-style-type: none"> <li>- prohibit invasive species from inclusion in landscape design proposals... require use of native, local stock</li> </ul> </li> <li>• River Crossing Structures: policy for use of clear span structures where possible on fisheries waters.</li> <li>• Stream Fragmentation: Refers to the Adaptive Management of Barriers in European Rivers 'AMBER Project' raising awareness of stream fragmentation and need for innovative solutions encouraging connectivity.</li> <li>• Water Conservation: Reduce water use, enhance water supply reliability, restore ecosystems, and respond to climate change and changing demographics.</li> <li>• Best practice, rainwater harvesting, regulation of agricultural abstraction and SUDS.</li> <li>• Climate Change: Native fish vulnerable to climate change and requires mitigation incl. planting of trees. Flooding and high flows causing nutrient enrichment and fine sediment.</li> <li>• Management Policies: Seek inclusion if river management policies in the form of:-               <ul style="list-style-type: none"> <li>- River Corridor Management Areas protecting against development in urban areas.</li> <li>- Special Preservation Orders provided for specific habitats in need of protection e.g. an Aquatic Protection Order.</li> <li>- Special Amenity Areas, identified for their potential as Linear Parklands along waterways.</li> </ul> </li> <li>• National Strategy for Angling Development: Seek support for this strategy.</li> </ul>
<p><b>NIEA – DAERA</b></p>	<ul style="list-style-type: none"> <li>• The Environmental Report should consider if there will be any transboundary effects.</li> <li>• Provide the following links:               <ul style="list-style-type: none"> <li>- Details of the features of designated sites both terrestrial and marine are available at <a href="https://www.daera-ni.gov.uk/topics/biodiversity-land-and-landscapes/protected-areas">https://www.daera-ni.gov.uk/topics/biodiversity-land-and-landscapes/protected-areas</a>.</li> <li>- An Air Pollution Information System is available at <a href="http://www.apis.ac.uk/srci">http://www.apis.ac.uk/srci</a>.</li> </ul> </li> <li>• 'Site Relevant Critical Loads' tool provides critical loads for acidity and nitrogen for designated features within every Special Area of Conservation, Special Protection Area or Area of Special Scientific Interest in the UK. Critical loads are assigned to each sensitive feature for either nutrient nitrogen or acidity. In addition, deposition data for nitrogen and sulphur at each site are provided, apportioned to major sources, and include transboundary sources.</li> </ul>

## 5.3 Key Issues Raised in Public Consultation on the Draft RSES

The draft RSES along with the SEA Environmental Report and the Natura Impact Report were put on public display on the 5<sup>th</sup> November 2018 until 23<sup>rd</sup> January 2019. In total 316 responses were received. These included submissions from members of the public, government bodies, NGOs, other state bodies/agencies, private companies etc. as well as the statutory consultees. A Director's Report on the submissions was prepared for the Elected members of the Assembly by EMRA and presented at the Assembly meeting of the 15<sup>th</sup> February 2019.

### 5.3.1 Statutory Submissions on the Draft RSES

Ten submissions were received from the SEA statutory consultees, including:

- Environmental Protection Agency (EPA);
- Department of Culture, Heritage and the Gaeltacht (DCHG);
- Department of Agriculture, Food and the Marine (DAFM);
- Two submissions from the Department of Housing, Planning, Community and Local Government (DHPLG);
- Two submissions from the Department of Communications, Climate Action and Environment (DCCAE);
- Geological Survey of Ireland (GSI) [part of DCCAE]; and
- Department of Rural and Community Development (DRCD).

The key issues raised and how they have been addressed in the draft RSES are summarised in **Table 5.3**. Further detail on how the submissions have been considered and addressed in the RSES is included in the *Director's Report on submissions to Draft Regional spatial and Economic Strategy* which is available on the EMRA website [<https://emra.ie/draft-rses-submissions/>].

**Table 5.3: Draft RSES - Summary of Submissions from the Statutory Consultees**

Consultee	Issue Raised	How this has been addressed in the RSES
Environmental Protection Agency (EPA)	<ul style="list-style-type: none"> <li>RSES should fully align with relevant environmental policy, plans and programmes at regional and national level. Additional key plans prepared at these levels should be incorporated into the RSES during interim reviews – a schematic showing plan linkages would be useful.</li> <li>Recommend linking RSOs to the relevant UN SDGs.</li> <li>Three cross-cutting principles are described, however the need for wider environmental protection merits further recognition in these principles.</li> <li>Figure 2.4 would merit updating showing the economic objectives in the centre, surrounded by social objectives, and environmental objectives in turn.</li> <li>Consider the merits of placing the Regional Decarbonisation Plan on a legislative footing; it should propose ambitious measures and targets for sectors in the region, and align with the NECP [in prep] and other sectoral plans. Useful to show a graphic showing a hierarchy of plans and their associated commitments.</li> <li>A useful addition would be support for the promotion of ‘sustainable buildings’ that achieve certain certification, at local authority level.</li> <li>RSES should ensure LA development plans and LAPs are aligned with Irish Water’s Capital Investment Plan and National Water Resources Plan [in prep].</li> <li>Additional headroom should be considered for the entire EMR (not just GDA), a need highlighted by the 2018 summer drought.</li> <li>RSES should promote sustainable management of wastewater in smaller towns, villages and communities, and outside of the Irish Water network. Avoid unsustainable increases in private treatment plants serving industry/housing estates in rural areas.</li> <li>RSES should ensure one-off housing in un-serviced rural areas is strongly deterred in land use plans. While RPO 4.51 is welcomed, the EPA recommends including specific targets and timeframes to drive implementation of this.</li> <li>The commitments to promotion of sustainable transport modes is welcomed and could be strengthened by including measurable targets and timeframes to drive delivery.</li> <li>Sustainable Transport section would benefit from a graphic setting out the ‘sustainable transport hierarchy’ to emphasis reprioritisation from fossil-fuel</li> </ul>	<p>The RSES sets out 16 Regional Strategic Outcomes (RSOs) informed by and closely aligned and supportive with the National Strategic Outcomes (NSOs) of the National Planning Framework and the UN Strategic Development Goals. These have also been developed in iteration with the Strategic Environmental Outcomes of the SEA process.</p> <p>The RSES has developed suites of Guiding Principles with key environmental considerations at the forefront to improve and protect ecological connectivity (Guiding Principles in the preparation of Green Infrastructure Strategies, Guiding Principles in the consideration of development on peatland areas).</p> <p>RSO 11, its corresponding RPOs and Guiding Principles encapsulates the commitment of the RSES to biodiversity protection in line with international, EU and national policy.</p> <p>RPO 7.29 referencing the Regional Decarbonisation Plan has been omitted as a result of other submissions from the DHPLG and CARO.</p> <p>In relation to sustainable buildings, the RSES commits to the use of sustainable construction materials. RPO 7.39, 7.40 and 7.41 promote energy conservation in public buildings, promotion of energy efficiency and promotion of building materials with low to zero embodied energy and CO<sub>2</sub> emissions and retrofitting of energy efficiency measures in buildings.</p> <p>Under alignment with other plans, the narrative in Section 3.1 ‘Developing a Growth Strategy for the Region’ has been refined. The Regional Assembly commits to the further development of an evidence-led asset base approach in collaboration with local authorities and regional stakeholders as part of the implementation of RSES (Chapter 12 references).</p> <p>While not referencing headroom in a water context specifically, RPO 4.2 reads: <i>“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and</i></p>

Consultee	Issue Raised	How this has been addressed in the RSES
	<p>dependent modes. Including a Guiding Principle committing to adhering to this hierarchy would be welcomed.</p> <ul style="list-style-type: none"> <li>• RSES would benefit from a specific measure to tackle legacy transport/modal issues in settlements.</li> <li>• RSES should consider sustainable modes for all journey types.</li> <li>• Further analysis on the issue of urban decline aside from ‘out of town shopping’.</li> <li>• Greater emphasis needed to support EV uptake and alternative fuels.</li> <li>• RSES should consider behavioural change aspects for encouraging commuters.</li> <li>• Recommend that a separate freight strategy is prepared, which includes consideration of risks to supply chains from climate change, extreme weather.</li> <li>• Important that legacy soil contamination issues are addressed in developing brownfield sites; should have regard to the Regional Waste Management Plans.</li> <li>• Welcomes the commitment that an RSES Implementation Group will be established – recommend also establishing an environmental sub-group to monitor the effectiveness of RSES environmental commitments at LA level.</li> <li>• Recommend establishing a series of regional fora over RSES lifetime to facilitate awareness and knowledge transfer, with support from EPA where relevant.</li> <li>• Useful to incl. estimated timeframes for key projects/lower-level plan delivery e.g. infrastructural plans, MASP, landscape character assessment etc.</li> <li>• Consider including a commitment that encourages LAs to review their existing heritage and biodiversity plans, to support the RA in compiling a Regional Biodiversity Action Plan and to ensure future zoning is informed by biodiversity considerations.</li> <li>• Acknowledge the extent to which the SEA recommendations and mitigation are included in the RSES. Further comments on the SEA incl. in Appendix II to the submission.</li> <li>• Future amendments to the RSES should be screened for likely significant effects on the environment as per the assessment method applied in the “environmental assessment” of the RSES.</li> <li>• An SEA Statement should be prepared in due course and send a copy to any environmental authority consulted during the process.</li> <li>• Specific mitigation measures and recommendations from the SEA and NIR should be reflected in the RSES, and where not included in the final RSES, appropriate justification should be given.</li> </ul>	<p><i>that the assimilative capacity of the receiving environment is not exceeded.”</i></p> <p>A new RPO has been added in section 10.2 under RPO 10.5 Water Supply: <i>“Work closely with Irish Water to revise the Draft Investment Plan (2020- 2024) and subsequent investment plans to align the supply of water services with the settlement strategy and objectives of the EMRA Regional Spatial and Economic Strategy.”</i></p> <p>In relation to water services in rural areas, the following is noted: RPO 10.14 to be amended to read: <i>“EMRA supports the servicing of rural villages (serviced sites) to provide an alternative to one-off housing in the countryside, in line with RPO 4.78.”</i></p> <p>The following has also been added: <i>“The Economic Strategy sets out Guiding Principles for the location of strategic employment areas that include access to; suitable locations (depending on the extent to which an enterprise is people or space intensive); serviced sites (based on whether an industry is dependent on a particular infrastructure such as energy, water, transport or communications networks); ...”</i></p> <p>Regarding legacy modal issues, two guiding principles are to be omitted (‘Support reverse commuting for those living in urban centres and commuting to work elsewhere.’ and ‘The predicted impact of the potential land use and transport infrastructure on modal split and transport greenhouse gas emissions should be assessed to deliver on national and regional targets.’). A new RPO 8.7 has been included <i>‘To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.’</i> and a new specific RPO 8.5 <i>‘To prepare a regional strategy for freight transport in collaboration with the relevant transport agencies and the other Assemblies.’</i></p> <p>For brownfield, the guiding principles for Compact Growth are being expanded to reference the establishment of a database of strategic brownfield and infill sites to be managed across stakeholders, as well as a requirement to liaise with the Regional Waste Management Office and to consider management of contaminated soil/waste.</p> <p>Regarding the implementation group, the RSES does not refer to setting up a specific environmental sub-group, but states that membership of the implementation group is a matter for the Assembly, it should contain representative from all the key</p>

Consultee	Issue Raised	How this has been addressed in the RSES
	<ul style="list-style-type: none"> <li>The SEA monitoring programme should be linked to the RSES implementation monitoring.</li> <li>If monitoring identifies adverse impacts related to implementation of the RSES, the Regional Assembly should ensure that suitable and effective remedial action is taken.</li> </ul> <p><b>Submission Appendix II - Specific Comments on the SEA:</b></p> <ul style="list-style-type: none"> <li>Links provided to more recent reports for baseline data.</li> <li>The LULUCFF Regulations are now in place and updated reference should be included.</li> <li>In the mitigation measures with regard to air pollution control, the National Air Pollution Control programme should be referenced.</li> <li>Monitoring: under Objective 5, an improvement in air quality trends in included in relation to emissions from transport NO<sub>x</sub> and PM. This should include reductions in emissions and ambient concentrations of NO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>.</li> <li>The monitoring programme should be flexible and should consider and deal with the potential for cumulative effects.</li> </ul>	<p>stakeholders who are involved in the formulation of the RSES and more importantly in the implementation of the RSES.</p> <p>Timeframes for plans/projects are not specifically outlined.</p> <p>How the SEA and AA recommendations have been incorporated are noted below in the responses to the DCHG submission summary.</p> <p>Suggestions for the SEA as provided by the EPA are reflected in the Addendum to the Environmental Report, included below in <b>Chapter 9</b> to this SEA Statement.</p>
<p>Department of Culture, Heritage and the Gaeltacht (DCHG)</p>	<ul style="list-style-type: none"> <li>The department has advised that the RSES should be developed to integrate biodiversity considerations.</li> <li>It should include a high level goal and specific key principle to conserve and restore biodiversity and to make a commitment to biodiversity conservation in general, not just protected sites, habitats and species.</li> <li>It is a concern that biodiversity conservation only comes under the key principle of Climate Action which may undermine its visibility and wider importance.</li> <li>Consider including an RSO in relation to the environment including biodiversity as recommended by the SEA ER.</li> <li>Consider making a clear policy statement in relation to conservation of biodiversity within and beyond protected sites (refer to the National Biodiversity Plan) in addition to RPO 10 and 11.</li> <li>Where ecosystems services mentioned (Chapter 3, Section 7.1, Section 7.3) it would be welcomed to acknowledge that biodiversity underpins ecosystem services to society.</li> <li>The term 'ecosystems services approach' should be defined for clarity with reference to biodiversity.</li> </ul>	<p>The protection of the Natura 2000 network and the ecological linkages that support it have been given consideration in the RSES document through relevant RPOs, supporting narrative and guiding principles. In particular, Environmental Assessment (RPO 3.4 - 3.6), Sustainable Growth (RPO 3.7), Biodiversity and Natural Heritage (RPO Chapter 7), Ecosystem services (RO 7.21) and Green Infrastructure (RPO 7.22-7.23).</p> <p>RSO 11 'Biodiversity and Natural Heritage' (aligning with NSO 7 and 8) "promotes co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection". In addition to the RSO, there are a number of key Regional Policy Objectives which give specific support and protection to biodiversity and these are set out in Chapter 7. In particular, RPO 7.16 states: "support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans."</p> <p>RPO 7.17 states: "Facilitate cross boundary co-ordination between Local Authorities and the relevant agencies in the Region to provide</p>

Consultee	Issue Raised	How this has been addressed in the RSES
	<ul style="list-style-type: none"> <li>Chapter 7 Environment – recommended that the key driver for the chapter includes biodiversity conservation as a key principle.</li> <li>Chapter 10 Infrastructure – recommend that the key driver for the chapter should include the key principle of environmental sustainability generally, and biodiversity conservation.</li> <li>Recommend RPO 7.18 reflects the need to conserve biodiversity in the park while providing for visitor experiences.</li> <li>Suggest rewording RPO 7.9 to include ‘sensitive species’.</li> <li>The Department welcomes the commitment to integrate an ecosystem services approach and promote GI (RSO 10).</li> <li>In relation to greenways, blueways and peatways, these are generally welcomed but the Department highlights the importance of defining their primary function (more sustainable movement of people) and secondary benefits, and that they should not be systematically regarded as green infrastructure. They are often located in sensitive areas and the large number of greenway proposals means there is potential for cumulative impacts.</li> <li>The RSES should consider addressing the potential constraints to development of Athlone’s unique position in the landscape and proximity to sites of international conservation importance, as these are not highlighted. RPO 4.7 for instance promotes capitalising on waterway amenity potential and green-blueway development. Athlone’s proximity to protected sites and the international importance of the hinterland supporting the Shannon Callows could be further explored in the main body of text and these constraints highlighted.</li> <li>In the Settlement Strategy for Mullingar and Longford, the proximity of a number of European Sites (interdependent bogs and wetlands with direct hydrological connectivity) is not acknowledged and no proactive mitigation measures have been proposed by the strategy for the significant predicted impact of changes to water quality and movement as noted by the NIR.</li> <li>The risks to peatlands arising from the RSES has been identified in the NIR but not clearly stated/incorporated into the relevant sections of the document – infrastructure (Chapter 10), sustainable water management (Section 10.2), wastewater and surface water sections.</li> <li>The RSES should reference the National Raised Bogs SAC Management Plan 2017-2022 and the National Peatlands Strategy.</li> </ul>	<p>clear governance arrangements and coordination mechanisms to support the development of ecological networks and enhanced connectivity between protected sites whilst also addressing the need for management of alien invasive species and the conservation of native species.”</p> <p>Further, the RSES has developed suites of Guiding Principles with key environmental considerations at the forefront to improve and protect ecological connectivity (Guiding Principles in the preparation of Green Infrastructure Strategies, Guiding Principles in the consideration of development on peatland areas). RSO 11, its corresponding RPOs and Guiding Principles encapsulates the commitment of the RSES to biodiversity protection in line with international, EU and national policy.</p> <p>The RSES will provide an ecological resource map for the region identifying designated sites.</p> <p>The RSES acknowledges that where other strategies and plans undergo review or changes to reflect the national and regional policy objectives and outcomes of both the NPF, and subsequently the RSES, they will consider any relevant environmental requirements. As per the legislation, amendments to county and local area plans on foot of the NPF and RSES will be subject to the SEA and AA processes in due course.</p> <p>The RSES explicitly states that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network (Chapter 3 Growth Strategy – Environmental Assessment). The narrative also states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect. This statement is accompanied by RPOs 3.4 -3.7 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural</p>

Consultee	Issue Raised	How this has been addressed in the RSES
	<ul style="list-style-type: none"> <li>The tourism policies should clearly recognise the need to protect and restore terrestrial, coastal and marine biodiversity and the natural landscape supporting the sector.</li> <li>The RSES should set out how tourism sector growth will be accomplished without further biodiversity loss and protecting biodiversity generally (in addition to the Natura 2000 network).</li> <li>RPO 6.17 in respect of monitoring proposals is welcomed.</li> <li>RSES should seek to ensure active consideration is given to potential impacts on biodiversity at the earliest stages not just at project level. The strategy should highlight areas where European sites may be affected by future development and include mitigation measures to specifically address these.</li> <li>The RSOs do not address the important European sites in and around the DMA – recommended that coastal and marine Natura 2000 provisions and conservation of wider marine environment are more explicitly embedded as priority objectives, and the potential for in-combination impacts should be acknowledged.</li> <li>Recommended that fast-tracking of ICZM is encouraged and for EMRA to consider playing a coordination role given the number of LAs involved.</li> <li>Provision of water services can have impacts and contingency provision on Natura 2000 sites needs to be carefully assessed. It is important to note the NIR mitigation which states that population growth/service provision needs to be phased to ensure protection of the environment.</li> <li>Welcomed inclusion of supporting a feasibility studies in relation to port development and carrying capacities.</li> <li>The RSES should set a good example of best practice regarding future growth; the main tools for this are SEA, AA, EIA and EclA. To support the evidence-based approach advocated by the RSES, the region’s resources (administrative, economic, responsibilities etc.) should be clearly identified and to set out the detail of any region-wide policies and collaborations necessary to ensure environmental data collection and sharing are integrated into the RSES.</li> <li>The Department supports the development of an ecological resource map for the region as recommended in the NIR and also adds that there is much ongoing work by the Department in this area at national level. It Priority should be given to habitat mapping in the coastal zone of the DMA. A repository of NIS/NIR documents to feed into the data sharing would also be welcome and support the development of a regional ecosystem services map.</li> </ul>	<p>heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>RPO 4.2 states: <i>“Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.”</i></p> <p>The RSES includes an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.</p> <p>RPO 3.7 states that <i>“Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.”</i></p> <p>In relation to visitor pressure, RPO 6.18 states: <i>“Support the preparation and implementation of Local Authority Tourism Strategies and Diaspora Strategies. All tourism strategies and plans should include clear monitoring protocols to monitor the ongoing effect of tourism on sensitive features with particular focus on natural and built heritage assets.”</i></p> <p>In terms of water quality RPO 7.11 states: <i>“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</i></p>

REPORT

Consultee	Issue Raised	How this has been addressed in the RSES
		<p><i>facilities with sufficient capacity and thus contribute to improved water quality in the Region.</i></p> <p>In terms of water supply, a new RPO 10.6 states: <i>“Delivery and phasing of services shall be subject to the required appraisal, planning and environmental assessment processes and shall avoid adverse impacts on the integrity of the Natura 2000 network.”</i></p> <p>A new RPO states 10.7: <i>“Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Planning Authorities and demonstrate phased infrastructure led growth to meet demands on the water supply, suitability of new and/or existing drinking water sources (for example hydromorphological pressures) and prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.”</i></p> <p>A new guiding principle has been added under Integration of Land Use and Transport as follows: <i>“Ensure the protection of Natura 2000 networks and associated ecological linkages. Plans and projects that have the potential to negatively impact on Natura 2000 sites should be subject to the requirement of the Habitats Directive.”</i></p>
<p>Department of Housing Planning and Local Government (DHPLG)</p>	<ul style="list-style-type: none"> <li>• The DHPLG welcomes the draft RSES as a clear strategic direction for the formulation of city / county development plans that will ensure a strong and consistent alignment between national and local level planning policies. The draft is a comprehensive framework for the future development of the Region that reflects the diversity of pressures and opportunities in different parts of the region.</li> <li>• The settlement strategy provides a strong regional structure that has avoided excessively dispersed regional pattern and has identified an appropriate number of regionally distributed centres (Key Towns).</li> <li>• With regard to the future county population growth figures as per the ‘Implementation Roadmap for the National Planning Framework’, for clarity it is requested that RPO 4.1 includes the reference to the infill / brownfield targets set out in the NPF.</li> <li>• The text on the approach to ‘Headroom’ should be tailored to the EMRA area and avoid references outside of the Region.</li> <li>• The integration of the MASP with the Transport Strategy for the Greater Dublin Area is welcomed. As is the emphasis on planned and sequential development of settlements with the focus on regeneration of underutilized areas and sites.</li> </ul>	<p>Various minor narrative changes have been reflected in editing of the RSES including those related to the Growth Strategy.</p> <p>Narrative text under Growth Strategy has been amended including the Outer Region terminology to ‘Gateway Region’.</p> <p>Narrative under rural development has been added</p> <p>Remit of CARO in relation to RPO’s has been revised.</p>

## REPORT

Consultee	Issue Raised	How this has been addressed in the RSES
	<ul style="list-style-type: none"> <li>The Strategy should include further supports for opportunities for rural employment and economic development in the areas of agri-business, energy, tourism, forestry, enterprise which can underpin balanced population growth.</li> <li>RPOs 7.29 and 7.30 seek to assign responsibility to CAROs where they have no remit and require revision in conjunction with DCCAE and others.</li> <li>RPO 7.39 should include a timeline to 2020 for the implementation of the Energy Performance in Buildings Directive.</li> <li>The Growth Strategy map would be enhanced with some regional assets included and the terminology 'outer region' and 'second cities' are too Dublin focused and require revision.</li> <li>The EU flag or logo should not be on the document as the EU play no role in the preparation of the RSES.</li> <li>The Marine Spatial Planning (MSP) Section also submitted that it welcomed the inclusion of the marine sector in the draft RSES.</li> <li>The submission outlines information on developments in MSP to date, the measures being taken to ensure terrestrial/marine planning integration and the legal obligations to be fulfilled by planning authorities via MSP legislation.</li> </ul>	
<p>Department of Communications, Climate Action and Environment (DCCAE)</p>	<ul style="list-style-type: none"> <li>DCCAE welcomes a strong emphasis on climate action throughout the draft RSES, and states that it is essential that there is appropriate coordination and coherence through the various offices and planning processes at national, regional and local level.</li> <li>The RSES should reflect the NPF with high level objectives in relation to climate mitigation which will help to promote the required coherence.</li> <li>Any role for the DCCAE funded CAROs in the RSES must reflect the role envisaged for the CAROs within the SLAs and their annual work programmes.</li> <li>Attention is drawn to DCCAE's Renewable Electricity Policy &amp; Development Framework (REPDF) which is currently in preparation and will involve the identification of strategic sites with potential to accommodate large-scale renewable electricity projects. Of particular importance with regard to the RSES and the REPDF is the objective to identify Strategic Energy Zones, where it is considered that the REPDF could complement and inform the RSES, perhaps at its next review. Recognition of the REPDF is requested.</li> </ul>	<p>RSO 9 provides a regional strategic outcome to support transition to low carbon and clean energy.</p> <p>The RPOs referring to CAROs have been amended.</p> <p>No reference to the Renewable Electricity Policy &amp; Development Framework (REPDF) or renewable electricity.</p>
<p>Department of Agriculture, Food</p>	<ul style="list-style-type: none"> <li>Noted that Ireland is one of the least forested EU countries</li> <li>National forestry assets are important carbon sinks and a key land use sector in contributing to the transition to a low-carbon future</li> </ul>	<p>RPO 4.79 amended with additional text added following 'open countryside': <i>And to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, energy, tourism, forestry enterprise.</i></p>

## REPORT

Consultee	Issue Raised	How this has been addressed in the RSES
and the Marine (DAFM)	<ul style="list-style-type: none"> <li>Irish forests are an important biodiversity resource.</li> <li>Outlines a number of guidelines and codes relating to forest management.</li> <li>Noted the Forestry Act 2014 includes provisions for environmental protection.</li> <li>Tree planting can also form an important aspect to farm income.</li> <li>Forestry is an important aspect of the Eastern &amp; Midland's economic, social and environmental landscape, with approx. 20% of Ireland's forestry grown here.</li> </ul>	
Department of Rural and Community Development (DRCD)	<ul style="list-style-type: none"> <li>The RSES is noted to use the CSO's definition of rural areas which is not consistent with the target of constituency of the DRCD or with the NPF.</li> <li>The RSES must reflect national rural development policy (towns up to 10,000) as well as villages and open countryside.</li> <li>The recognition of the need to promote new economic opportunities in smaller towns and rural areas, as well as town centre revival, is welcomed.</li> <li>Suggested rewording of RPO 4.23 to "ratio of jobs to <u>local</u> workers".</li> <li>RPO 4.50 should recognise that in addition to supporting "ready to go projects" under the Rural Regeneration &amp; Development Fund, other projects which have clear goals but require further development are also supported; deleting the phrase "ready-to-do" would achieve this.</li> <li>Noted there is scope to expand RPO 4.52 to support the diversification of rural economies and job creation.</li> <li>Unclear what RPO 4.55 is intended to achieve as currently drafted, as not consistent with the NPF in supporting rural diversification.</li> <li>Section 1.6 – Regional Profile uses Census 2011 figures.</li> <li>Chapter 2 – Strategic Vision does not correctly reflect the NSOs in the NPF (referring to Strengthened Rural Economies and Communities); RSO 3 should capture economic as well as spatial development.</li> <li>Welcomes reference to improving social inclusion.</li> <li>Administrative boundaries do not confine economic and social development and regional collaboration is important and should be implemented across the three regions.</li> <li>Growth Strategy places strong focus on North-South collaboration – should also include collaboration/connectivity with the other NUTS II regions.</li> <li>Athlone and Key Towns in the Outer Region should also look to the west and south in relation to building economic activity/trade.</li> </ul>	<p>The RSES has omitted reference to 1,500 population in the definition of rural areas.</p> <p>Term 'ready-to-go' omitted from RPO.</p> <p>RPO 4.79 amended by the insertion of the following additional text following 'open countryside': <i>And to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, energy, tourism, forestry enterprise.</i></p> <p>The following new RPO 4.84 added: <i>Support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas.</i></p> <p>In relation to the concerns with RPO 4.82 on development that is urban in nature, it is considered reasonable and proper planning practice that economic development that is urban in nature should in the first instance locate in urban areas. In association with amendments proposed in to the RSES it should be noted that such urban locations can be located in rural areas. It is therefore not considered necessary to amend this RPO.</p> <p>The reference to 2011 census in Figure 1.5 was incorrect, it now reads 2016.</p> <p>RSO 3 amended to reflect a need to strengthen rural, networks, economies and communities.</p> <p>New sections under the heading of 'Strategic Connections' is added which includes sections on 'Strategic Connections to the Northern and Western Region', Strategic Connections to the Southern Region' and 'Eastern Economic Corridor; Dublin-Belfast-Rosslare Europort'.</p>

### 5.3.2 Transboundary Submissions on the Draft RSES

Transboundary consultation was specifically undertaken with the Department of Agriculture, Environment and Rural and Environmental Affairs in Northern Ireland as part of the SEA. A number of other transboundary submissions were also received from Northern Ireland and these have been grouped and addressed in **Table 5.4**.

**Table 5.4: Draft RSES - Summary of Transboundary Submissions**

Consultee	Issues Raised	How this has been addressed
<p>Department of Agriculture, Environment and Rural Affairs (DAERA)</p>	<ul style="list-style-type: none"> <li>• Welcomes the consideration of transboundary issues and the identification of mitigation measures.</li> <li>• The SEA should include an assessment of impact of wind energy on bats and potential transboundary impacts.</li> <li>• The NIR's alterations to air quality should include an assessment of potential impact of nitrogen deposition from agricultural ammonia emissions.</li> <li>• A map of sites in NI which could potentially be impacted should be included.</li> <li>• The NIR should refer to the status of habitats and species in NI (JNCC reports).</li> <li>• Marine protected species flagged for consideration with management units and distances noted.</li> <li>• The Natura 2000 impact report should include the potential impact of predicted development along the coast and how this will impact coastal change in relation to habitat loss.</li> <li>• Fig. 7.1 in the NIR does not include those Natura 2000 sites in NI that may be impacted; include all receptors on the map.</li> <li>• The NIR does not consider the potential impacts of reduced water quality and port growth on Natura 2000 sites in NI as well as ROI sites.</li> <li>• The NI Marine Protected Areas are not listed on p.43 in the environmental constraints list for Dundalk; ensure MCZs are considered.</li> <li>• NI Marine Plan not mentioned on p.92 within Integrated Land and Marine Planning section.</li> <li>• Coastal erosion is not mentioned in Climate Change resilience.</li> <li>• Impacts p.114 – no detail on how impacts of climate change may impact species at higher end of food web (e.g. birds, cetaceans, ecosystems in relation to site selection features).</li> </ul>	<p>The RSES is noted to be a strategic planning document focused in the first instance at the regional level. All plans are subject to AA when prepared. This will ensure avoidance of adverse effects in the first instance and mitigation measures if required. Any mitigation measures arising from the AA of these plans must be carried through to project stage.</p> <p>The RSES states that feasibility studies will be carried out to support decision making in relation to policy base for the RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network (Chapter 3 Growth Strategy - Assessment of Possible Impacts – Environmental Assessment).</p> <p>The narrative states that at the project consent stage, if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated, then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect. This statement is accompanied by RPO 3.4 and 3.5 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p>

REPORT

Consultee	Issues Raised	How this has been addressed
	<ul style="list-style-type: none"> <li>No mention of invasive species in the NIR in relation to port growth but they are mentioned in the SEA.</li> <li>Reference to the NI terrestrial planning documents (Regional Development Strategy and the Strategic Planning Policy Statements). It is noted there is a lack of references to the transboundary marine issues in the ER.</li> <li>The lack of reference to NI marine policy documents raises concern over consideration of transboundary marine aspects with the ER and RSES – should be listed in Chap. 4 and Appendix A to the ER.</li> <li>Noted that Carlingford Lough is taken into consideration as the only marine transboundary area, specifically wastewater, agricultural and shell fisheries issues.</li> <li>Opportunity for RSES to consider potential of heritage assets adjacent to potential greenways.</li> <li>Suggested updates to the SEA ER provided (plans, datasets and updated figures etc.)</li> </ul>	<p>Appendix G of the NIR sets out a summary of the conservation status of each habitat and species from both 2007 and 2013 as reported by NPWS. This information has fed into the assessment.</p> <p>It is noted that the RSES includes RPO 7.3 as follows: <i>‘EMRA will support the use of Integrated Coastal Zone Management (ICZM) to enable collaborative and stakeholder engagement approaches to the management and protection of coastal resources against coastal erosion, flooding and other threats.’</i> Furthermore, following meetings with NPWS, the ICZM aspect will be prioritised given the pressures.’ Additional text included for RPO 7.3 and text in RPO 7.4 reflect coastal erosion issues.</p> <p>With regards to the marine environment, while it is acknowledged that the RSES has marine aspects (mainly in respect of supporting port development) it is predominantly a land-use plan and has been prepared with an understanding that Ireland is currently drafting its first Marine Planning Framework Directive. This framework is undergoing its own SEA and AA which will consider all aspects of the marine space, including those sectors which have the potential to impact on coastal and marine habitats and species.</p> <p>Suggestions for the SEA as provided by DAERA are reflected in the Addendum to the Environmental Report, included below in <b>Chapter 9</b> to this SEA Statement.</p>
<p>Department of Infrastructure (DfI)</p>	<ul style="list-style-type: none"> <li>Existing positive working relationship between NI and ROI planning authorities which should continue; DfI affirms commitment to working cooperatively.</li> <li>Dublin-Belfast Economic Corridor is important strategically and in the long-term, its importance reflective also in NI’s Regional Development Strategy 2025. Note the role of Newry as a designated Main Hub and its relationships to Drogheda and Dundalk.</li> <li>A high speed rail link between Dublin-Belfast will have far-reaching benefits.</li> <li>Targeted investment in transport needed and will benefit the Dublin-Belfast corridor.</li> <li>Continued cross-border collaboration emphasised – DfI will continue to co-chair the Cross Border Development Plan Working Group.</li> <li>Opportunity for dialogue with the development of the Regional Infrastructure Delivery Plan.</li> </ul>	<p>The section on Eastern Economic Corridor recognises the links between Newry, Belfast, Drogheda, Dundalk and Dublin.</p>

## REPORT

Consultee	Issues Raised	How this has been addressed
	<ul style="list-style-type: none"> <li>• Welcomes support for all-island tourism initiatives.</li> <li>• DfI will continue liaising with OPW on flood risk management planning.</li> </ul>	
Newry, Mourne and Down District Council	<ul style="list-style-type: none"> <li>• Cross-border collaboration is highlighted as important and that the economic, social and environmental interest of Newry, Mourne and Down are taken into account.</li> <li>• The strategic placement of Newry and neighbouring Warrenpoint is noted, and the contributions to the Dublin-Belfast Economic Corridor, which is suggested be updated to 'internationally significant'.</li> </ul>	The section on Eastern Economic Corridor recognises the links between Newry, Belfast, Drogheda, Dundalk and Dublin.
Newry and Mourne Co-operative and Enterprise Agency	<ul style="list-style-type: none"> <li>• Welcomes the recognition and strategic significance of the Newry/Dundalk/Drogheda transport and trade axis, as well as the positive social interaction it supports.</li> </ul>	The section on Eastern Economic Corridor recognises the links between Newry, Belfast, Drogheda, Dundalk and Dublin.

### 5.3.3 Other Environmental Submissions on the Draft RSES

Public consultation, as outlined in **Section 5.3** gave rise to over 316 submissions from a range of stakeholders. All submissions have been reviewed and considered by the team prior to amending the draft RSES. Throughout the submissions a number of items and issues were identified for the SEA, AA and RFRA processes (see **Table 5.5**) as well as other key environmental issues (**Table 5.6**). It should be noted the *Director's Report on Submissions to Draft Regional Spatial and Economic Strategy* contains a detailed discussion of all issues raised and how they have been addressed in the RSES (refer to EMRA website [<https://emra.ie/draft-rses-submissions/>] for this report).

**Table 5.5: Draft RSES - Summary of Key Environmental Issues for the SEA, AA and RFRA**

Issues Raised
<ul style="list-style-type: none"> <li>• A number of submissions acknowledged the extent that the recommendations and mitigations of the SEA Environmental Report have been reflected in the RSES and the RPOs 3.2 and 3.3 in particular. Specific mitigation measures and recommendations from the SEA and NIR should be reflected in the RSES, and where not included in the final RSES, appropriate justification should be given.</li> <li>• It is recognised that the draft RSES and the Regional Flood Risk Assessment has considered climate change may increase risk of flooding in the future and it is welcomed that this is demonstrated in the Option C of the Climate Scenarios in the preferred Growth strategy Scenario.</li> <li>• One submission contended that the Strategic Environmental Assessment (SEA) Environmental Report, in line with the obligations of both the 2015 Climate Act and the SEA Directive, must estimate the greenhouse gas emissions which will result from implementation of the Strategy. The work of the EPA on national emissions and of CODEMA on Dublin emissions make this practical. Comparative analysis of different emissions levels which would result from alternative strategies or alternative elements of the</li> </ul>

Strategy is needed. The draft Strategy and SEA Report should carry out a quantitative analysis of greenhouse gas emissions from the Region and the different emissions levels which would result from alternatives.

- The RSES requires implementable, clear objectives which are underpinned by legally-enforced targets, in tandem with the SEA, AA and RFRA. It was also noted that it should be a tool for defining spatial principles which meets development and environmental goals, such as reducing greenhouse gas emissions, avoiding global warming and depletion of resources. One submission contended that there are no indicators are specified in the Strategy itself and those set out in the Strategic Environmental Assessment Report are poorly thought out and unclear.
- Submissions commenting on the Growth Strategy noted that to strengthen the link between the SEA and the RSES, the criteria in Table 3.1 'Natural Capital' could be amended to ensure proper integration of the recommendations and measures, arising from the SEA/AA/FRA into local land use planning. The inclusion of RPO 3.4, requiring Local Authorities to promote an ecosystem services approach to the preparation of statutory land use plans was welcomed noting that it could be further strengthened at project level. It is also submitted that this section on ecosystem services should be relocated to Chapter 7 Environment, to provide a more coherent policy context.
- Acknowledgement of the recommendation that tourism initiatives should consider the requirements of the SEA and Habitats Directives respectively.
- With respect to flooding issues, a submission reiterated a number of aspects of the RFRA and strategy which should be considered necessary to ensure safe and sustainable communities in the future: recognition that the strategy may increase flood risk in the future and future planning decisions should take this into account; support expressed for flood relief measures; need to address proper site/route selection; SUDS; recognition of coastal erosion as a significant issue and considered in the context of ICZM; and requirements to undertake specific FRAs as appropriate. Also noted that consolidated development and urban and brownfield development/infill in areas prone to flooding may increase flood risk if not carefully managed – this risk should be clearly noted. Suggested that Option C under the Climate Scenarios might be more affirmative. It is suggested that any further department circular on flooding which is issued prior to RFRA finalisation and the use of CFRAM maps might be referenced as appropriate.
- A submission noted that no baseline of the condition or conservation status for each of the Natura Sites in the EMRA is provided to allow actions to be measured against the baseline.

#### Influence on the RSES

The comments in submissions related to SEA/AA/RFRA have been included in the iterative environmental assessment of the formulation of the RSES for the region. Where material amendments were proposed, these were subject to environmental assessment and further consultation. This is reflective of all stages of the RSES process which are fully compliant with the statutory requirements of SEA legislation. See **Appendix A** to this SEA Statement and also Chapter 9 of the NIR [under separate cover] for details on how mitigation has been applied.

The Regional Assembly has strongly committed to the principle of evidence-based policy making and have liaised with the relevant transport authorities to agree a robust model for the calculation of emissions from road transport in the region. The Assembly has noted that there is a requirement for lead-in time to specify and recalibrate the model for the regional scale and to determine the correct inputs and outputs that will deliver a robust assessment. Following adoption of the RSES, the regional transport emissions assessment will be incorporated as a Key Regional Indicator into the statutory monitoring and reporting process of the RSES, as set out in Chapter 12 Implementation and Monitoring, including the statutory two-yearly reporting and six-year review of RSES implementation by EMRA.

In relation to the submissions on the Growth Strategy, ecosystem services and natural capital, the comments were noted in relation to SEA/AA/FRA, which inform the ongoing environmental process and are addressed in further detail in Chapter 14 of the Directors Report. The Growth Strategy currently sets out policy to promote an ecosystem services approach in the preparation of statutory land use plans by Local Authorities. Section 7.6 Biodiversity and Natural Heritage now also includes a better policy context in the final RSES. Table 3.1 'Natural Capital' column has also been amended to ensure the proper integration of the recommendations and proposed mitigation measures arising from SEA/AA/RFRA, it now reads: "Integration of recommendations and proposed mitigation measures, arising from SEA/AA/RFRA underpinned by a regional Green Infrastructure and ecosystem services approach." No further changes are made to Table 3.1, however the narrative in the Growth Strategy has been refined to provide for greater clarity on the integration of environmental assessment in the development of the strategy. The section on ecosystems approach has been relocated to Chapter 7 – Environment.

## REPORT

Additional amendments to the RSES Chapter 7 – Environment were also made based on submissions commenting on the SEA. Amendments are under the following headings and are outlined in detail in the *Director’s Report on submissions to Draft Regional spatial and Economic Strategy* which is available on the EMRA website [<https://emra.ie/draft-rses-submissions/>]:

- Integrated land and marine planning;
- A clean and health environment;
- Flood risk management;
- Biodiversity and natural heritage;
- Green and blue infrastructure;
- Landscape; and
- Climate change.

In relation to monitoring, there is a statutory monitoring and reporting aspect of the RSES to occur two years after adoption, the RSES commits the Assembly to a more active monitoring role with the establishment of an evidence baseline that is regularly updated. It will be a function of the implementation group to establish the indicators for measurement that are aligned with the regional strategic outcomes of the RSES. This will follow on from the work carried out in the early stages of the RSES process including the socio-economic baseline reports. This will be performed in an iterative fashion with the SEA monitoring function.

RPO 3.4 has been modified to take account of the change from place-specific policy that is to be applied throughout the document and additional wording added to RPO 3.4 to state that: ‘... *In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.*’ The RSES includes an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.

The need for careful management of infill and brownfield development was noted, in order to take into consideration the risk of flooding. Climate change is likely to exacerbate flood risks in urban areas, it is noted that climate change will likely increase flood risk in future. The RSES and the Regional Flood Risk Assessment has considered that climate change may increase risk of flooding in the future and this is demonstrated in the Option C of the Climate Scenarios in the preferred Growth Strategy Scenario.

Appendix G of the NIR sets out a summary of the conservation status of each habitat and species from both 2007 and 2013 as reported by NPWS; this information has fed into the assessment. The importance of ex-situ habitats for protected species is noted in Chapter 6 of the NIR, and it is accepted that it could apply to any and all protected habitats and species in terms of supporting function. Policies such as RPO 3.4 and RPO 7.16 require the application of AA through the planning hierarchy in response to the greater levels of detail available as plans and projects evolve; this is in line with the mitigation strategy outlined in Chapter 9 of the NIR.

**Table 5.6: Draft RSES - Summary of Other Key Environmental Issues**

Issues Raised
<ul style="list-style-type: none"><li>• One submission raised the importance of aggregates to the region and nationally in terms of raw materials needed to support the level of housing and building requirements set out by the NPF and RSEs, as well as ensuring that development does not preclude the use of such resources. Attention was also drawn to the potential contribution</li></ul>

of the natural resources sector in Ireland to climate change in terms of development of the zinc and lithium prospects in the Region which can help to position Ireland as major international source of battery technology and raw materials.

- A number of submissions welcomed the delivery of a regional landscape character assessment, within a set timeframe following adoption of the national landscape character assessment as described in RPO 7.25. In relation to ensuring that regard is had to any future National Landscape and/or Seascape Character Assessment in the development planning and implementation of energy networks, it is recommended that the Guiding Principles on p180 be amended to reflect this.
- The draft Strategy refers to Smarter Travel, but it doesn't explain it or set out its targets or seek to implement it in the RPOs. There should be effective targets for decarbonisation of transport; new development; no increase in kilometres travelled by the car fleet; increase modal share; increase cycle mode share. It is requested that there be a rethinking of the transport section of the RSES to be consistent with the Smarter Travel policy.
- A submission indicated that section 10.4 should be moved to Chapter 7 having regard to the Circular Economy. A suggested RPO is provided that 'Development plans shall support the transition to a circular economy by identifying how waste will be reduced and by facilitating the use of materials at their highest value for as long as possible, in line with the circular economy.' A new section 10.4 is suggested and areas to be covered identified as disposal/recovery capacity, recycling infrastructure (recycling banks), CA sites and storage facilities for household/commercial bins. A submission has indicated that RPO 10.20, relating to reduction of waste etc. is better suited to a Waste Management Plan rather than a Development Plan. Another submission indicates that further thermal treatment capacity than that envisaged in the Eastern Midland Regional Waste Management Plan will be required in the future.
- One submission reiterated the proposals to implement the appointment of a regional architect and the strengthening of LA architect's departments.
- A new guiding principle was suggested under Vision & Guiding Principles emphasizing exploring strategic areas for carbon sequestration/R&D requirements in prepping GI Strategies.
- The CARO regional structure does not align with RA boundaries, but is stated that synergies will be explored. Recommendations on the removal of RPO 7.29 and 7.30 as a Regional Decarbonisation Plan was not identified in the National Mitigation Plan or National Adaptation Framework, and is not part of CARO's function. RPO 7.32 was suggested to be reworded for clarity in relation to local authority adaptation strategies. A new RPO was also proposed for inclusion to identify Projected Climate Impact Areas, as well as some rewording to RPO 7.34 on Renewable Energy Zones and RPO 7.37 on identifying and mapping district heating zones.
- One submission contended that the RSES should have concrete policy provisions based on targets, however it contains contradictory policies i.e. promotion of infrastructure with high carbon costs (e.g. airports and roads) while exempting agriculture from greenhouse gas reductions, a sector for which a clear direction is not provided.
- A number of submissions flagged that biodiversity is not being protected and conserved specifically for its own sake as a high level objective, but mentioned only in relation to specific RPOs and uses (energy infrastructure, GI etc.).
- One submission recommended that a new map is created in relation green infrastructure in Chapter 5 which is based on a regional assessment of existing sites and include proposals where habitats could be recreated or enhanced to form new networks and connections.
- A submission also noted that greater clarity needed between green infrastructure, trails and greenways, noting also that canals are physical features, also regional parks and agricultural lands have limited range of habitats and should not be classed as natural assets. A number of submissions called for the inclusion of a definition of Green Infrastructure. Request that the concept of Green Infrastructure be reflected throughout the draft RSES. Request for the inclusion of a Green Infrastructure strategy for the region and its preparation to be included as an RPO.
- In relation to the section on the status of designated sites, a number of submissions referred to the need for a baseline of the condition or conservation status for each of the Natura sites. And the need to discuss the specific threats to the sites within the EMRA region.
- In relation to the Biodiversity and Natural Heritage Section 7.5, policy objectives were suggested in relation to support coordination between LAs regarding invasive species surveys and regional responses, and to encourage greater awareness of potential threats caused by invasive species and how they can be spread. An RPO is suggested on managing invasives where there are hydrological connections and pathways to European Sites to be carefully considered and implemented in order to prevent the spread of invasives to sensitive sites. Another submission suggests including support for the implementation of the All-Ireland Pollinator Plan 2015 – 2020, of which actions LAs

should incorporate when managing their parks, open spaces, roadside verges and all vegetation in a way that provides more opportunities for biodiversity, while being cognisant of the threat of the spread of invasive species.

- The UNESCO Biosphere zonation includes a marine core, buffer and transition zones in addition to the terrestrial ones mentioned in the RSES. RPO 7.20: This should state that it will be done in cooperation with the Dublin Bay UNESCO Biosphere Partnership. A submission suggested the heading 'Non-designated Sites' should be changed, as both the National Park and the UNESCO Biosphere have designated Natura 2000 sites. The designation of the Phoenix Park should also be included and National Special Amenity Areas in Dublin due to their benefits for nature conservation.
- Additional text is recommended for inclusion in relation to the designation of a National Park in the Midlands, centred on the bogs, for sustainable after-use, tourism and amenity. Requested amendment to RPO 7.19 as follows; "Support the consideration of designating a National Park or parks for the peatlands area in the Midlands, based on the Lough Ree and Mid Shannon "Wet and Wild Lands - A Shared Ambition" and the central bogs of the Midlands.'
- A submission requested that a paragraph be added after the Dublin Bay Biosphere as follows to include consideration of geological heritage, as well as to include support for a UNESCO GeoPark in Westmeath/Offaly.
- In relation to the heading of agriculture in Chapter 7, a submissions noted there are expectations for timelines and measurable actions to be set at regional level in the Draft RSES 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.
- A submission flagged agriculture as the main land use contributing to water quality issues, but for which no clear targets are outlined in the RSES, which also promotes intensification of agriculture.
- In relation to Blueways, a number of submissions noted that Blueways were primarily focused on navigation and water sports without reference to water quality, fisheries and ecological habitats. Under the narrative on Sea Ports, insert: 'In order to minimise potential impacts on EU protected habitats, brownfield port developments which maximise the capacity of existing port sites should be prioritised over greenfield developments.'
- One submission noted there are no objectives which focus on financial investment/goals for protecting and restoring habitats, which inform the basis of natural capital and underpins the RSES; it is asked that an additional recommendation on financial investment for biodiversity is included.
- The importance of ex-situ habitats supporting Brent geese was noted to be mentioned in the NIR in relation to the MetroLink but not elsewhere; a conservation plan is stated to be needed for this species and ex-situ sites with relevant objectives in CDPs. The RSES and associate documents should address this issue and support conservation of the species.
- A submission stated that some areas are considered too ecologically sensitive for greenways and blueways, with requested changes to the wording around these policies to make this clear. Suggested wording changes are offered for RPO 7.15 to also include protection of biodiversity and the addition that county biodiversity plans should be developed/resourced, noting that habitat/wildlife conservation in general is missing from the RSES. Noted that 7.15 also fails to integrate the ecosystems services approach e.g. nature-based solutions for flood management. Recommendation that the word 'environment' is included in RPO 11.1 relating to transboundary cooperation. Recommended that local authorities make use of bird wind sensitivity mapping tool.
- In relation to growth of the marine economy, a request was received for further certainty with regards to the marine economy and conservation of a marine environment, the divide between marine and terrestrial planning, with no certainty provided in relation to conservation nor any risk-based analysis approach outlined for developing the marine economy and any arising mitigation/adaptation. Request that in order to achieve RSO no. 7 and RSO no. 11, there is a need to apply an effective timetable for achievement of standards and targets.
- There is a need to consider carefully alternative social and economic functions for the peatlands. Emphasise the importance of conservation of peatlands and wetlands as well as forestry to absorb carbon, and important biodiversity resources.

## REPORT

- The importance of soils was highlighted in several submissions, and for greater consideration of soils. Traditional farm landscapes are identified as an asset in the RSES request for more analysis. Involvement of agriculture in climate change adaptation through the European Innovation Partnership initiative, rainwater harvesting, support for bio-methane, and farm-based energy co-operatives. Request for the Assembly to support a comprehensive after-use framework plan for the industrial peatlands in the Midlands. The RSES should note and support the Transition Team in place to deal with both the immediacies of job losses and the longer term strategic planning for the 80,000+ ha, of peatlands. Request for increased emphasis on restoration of peatlands in the RSES. Refer to the threat of illegal dumping in peatlands and uplands. Request to investigate the role of peatlands to alleviate flooding.

### Influence on the RSES

Reference to mineral resources is referenced only indirectly through the RSES's definition of natural capital (i.e. "...e.g. plants, animals, air, water, soils, minerals"). The importance of aggregate materials and protecting their strategic importance has not been specifically included.

In relation to water protection plans, the following text below the first paragraph of the Regional Context section has been included: *'EMRA supports the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, EMRA supports the inclusion of objectives in County Development Plans relating to the provision of mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans.'*

In relation to landscape and energy networks, Guiding Principles relating to the provision of energy networks have been amended to include the following bullet point: *'regard for any National or Regional Landscape/Seascape Character Assessment'*, and to add the following text to the second bullet point: *'and address issues of climate resilience, biodiversity, impact on soils and water quality.'*

In relation to decarbonisation of transport, sustainable settlement patterns and compact growth, there is a section in Chapter 7 - Environment that deals with these issues. With regard to Smarter Travel and the targets contained therein, this is referenced as the national policy in table 8.1, however narrative on Smarter Travel policy and the targets on increase modal share; increase cycle mode share has been added.

With regard to waste and the circular economy, RPO 10.25 has been amended to read: *'Development Plans shall identify how waste will be reduced, in line with the principles of the circular economy, facilitating the use of materials at their highest value for as long as possible and how remaining quantum of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food and shall take account of the requirements of the Easter-Midlands Region Waste Management Plan.'*

The wording of the Guiding Principles are expanded to include reference to carbon sequestration in green Infrastructure Strategies.

Reference to CARO in RPO 7.29 and 7.30 have been omitted and more generally RPO 7.30-RPO 7.34 have been amended.

A new RPO was proposed which stated: *'Local Authorities in the Region shall, as part of the development plan process, consider the identification and mapping of Projected Climate Impact Areas. There should include areas subject to projected future climate change risks and related impacts, for example urban heating, urban cooling, coastal erosion, flooding, etc. Those areas identified as Projected Climate Impact Areas could be spatially represented by Local Authorities in County Development Plans, Strategic Development Zone Planning Schemes and Local Area Plans, as appropriate. The mapping of Projected Climate Impact Areas should directly inform the wording of policies, objectives, and development management standards to inform the planning consent process. The identification of Projected Climate Impact Areas will take into account environmental safeguards and the protection of natural and built heritage features, biodiversity and views and prospects.'* This was not brought forward to the final RSES.

In relation to greenways, they are already dealt with in a separate Section 5.6 Integrated Land Use and Transport in recognition of the difference between GI and Greenways. Minor amendments are proposed to allow for potential extensions to the metropolitan greenway network. RPO 5.7 has been strengthened to identify, manage, and develop

and protect regional green infrastructure and to develop a GI policy in the Metropolitan Area. The review of the GI map and development of GI policy will be addressed post adoption by the MASP Implementation Group set out in Chapter 12. In relation to RPO 7.24 a reference to the capacity of a greenway being limited to what is ecologically sustainable has been included. The EU definition of Green Infrastructure has been added to Section 5.9: *'Green Infrastructure can be broadly defined as a strategically planned network of high quality natural and semi-natural areas with other environmental features, which is designed and managed to deliver a wide range of ecosystem services and protect biodiversity in both rural and urban settings.'*

Invasive alien species are referenced throughout Chapter 7 of the RSES, RPO 7.17 highlights the need for management of invasive alien species. The importance of the All-Ireland Pollinator Plan 2015 – 2020 is also acknowledged which is referenced in section 7.5. Amendments made to RPO 7.18 which refers to all aspects of park management, not just visitor experiences and facilities, and to also to RPO 7.20.

At the end of the paragraph on 'Status of designated sites' on page 148 a reference to Appendix F which lists all designated sites in the Region has been included.

Amendment to RPO 7.20: Promote the development of improved visitor experiences, nature conservation and sustainable development activities in cooperation with the Dublin Bay UNESCO Biosphere Partnership. The text in the paragraph on 'Non-designated sites supporting biodiversity' page 149 has been amended as follows: *'Biodiversity supporting sites in the Region (which may contain designated sites within their area) include national parks (Wicklow Mountains) and UNESCO biosphere reserves (Dublin Bay), where environmental conservation is combined with visitor management strategies to support the development of unique educational, cultural and recreational opportunities. Biodiversity can also be found on the edges and right in the centre of high density urban areas; in parks, hedgerows, graveyards, rivers and gardens, allowing urban populations to connect with nature in our cities and towns (see Section 7.7 Green Infrastructure).'*

Special Amenity Areas and the Phoenix Park are referred to in section 5.2 and 5.9 of the RSES. The National Parks and Wildlife Service in association with local authorities, landowners and other key stakeholders would need to lead on the designation of a National Park for the Midlands. Designation of UNESCO GeoParks is not a function of EMRA.

In relation to protected site/species conservation status, it is noted that the NPWS deal with reporting on the conservation status of habitats and species listed under the Habitats Directive. It is stated that the basis on which land use and spatial planning will play its part in halting and reversing biodiversity loss are dealt with as part of RPO 7.16: *'supports the implementation of the Habitats Directive in order to improve the conservation status of protected species and habitats in the Region, and ensure alignment between the EU Birds and Habitats Directives and Local Authority Development Plans.'* Additional text relating to Natura 2000 has been added to the guiding Principles for integrated land use.

In relation to the section on Blueways on page 156, reference to the importance of Blueways for water quality, fisheries and ecological habitats, and for activities such as kayaking and snorkelling has been added.

In relation to water supply, new RPO 10.5 has been added: Water Supply: *'Work closely with Irish Water to revise the Draft Investment Plan (2020- 2024) and subsequent investment plans to align the supply of water services with the settlement strategy and objectives of the EMRA Regional Spatial and Economic Strategy; New RPO 10.6 has been added: Delivery and phasing of services shall be subject to the required appraisal, planning and environmental assessment processes and shall avoid adverse impacts on the integrity of the Natura 2000 network; and New RPO 10.7 has been added: Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Planning Authorities and demonstrate phased infrastructure led growth to meet demands on the water supply, suitability of new and/or existing drinking water sources (for example hydromorphological pressures) and prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.'*

RPO 7.29 deals with collaboration between stakeholders and local authorities and development of partnerships for integrated peatland management that incorporate relevant strategies such as Bord na Mona Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans.

In relation to the request for a timetable for the achievement of standards and targets for RSO 7 and RSO 11, EMRA note that they are high level strategic outcomes which link with National Strategic Outcomes and with the UN Sustainable Development Goals. As such, RSOs are not designed to contain a timetable for the achievement of standards and targets.

## REPORT

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Regarding the marine economy and conservation, a risk-based analysis for the continued growth of the marine economy and mitigation and adaptation measures are considered a matter for *Harnessing Our Ocean Wealth – An Integrated Marine Plan for Ireland* (HOOW), which sets out the National Policy for growth of the marine economy. The plan sets out three high level goals of equal importance, one of which is achieving healthy ecosystems that provide monetary and non-monetary goods and services.

RPO 11.1 includes 'economic growth' but not 'environment'.

Regarding traditional farming, identification of food production areas is considered more appropriate at the local authority level rather than at a Regional level.

With regard to peatlands, amended text of RPO 7.29 now includes the Transition Team as a stakeholder. RPO 7.29 deals with collaboration between stakeholders and local authorities and development of partnerships for integrated peatland management that incorporate relevant strategies such as Bord na Mona Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans.

## 5.4 Key Issues Raised in Public Consultation on the Material Amendments to the Draft RSES

On foot of the above consultations and engagement at the EMRA meeting of 19th October 2018 a draft RSES was prepared and made available for public consultation between 5<sup>th</sup> November 2018 and 23<sup>rd</sup> January 2019 inclusive. A total of 312 submissions were received and a Director's Report was prepared. At the EMRA meeting of 1<sup>st</sup> March 2019, the submissions were considered and the members agreed to make the Strategy subject to 139 proposed Material Amendments.

It was deemed that a number of these amendments were material and as such, would require environmental assessment (under SEA, AA), in order to determine if significant impacts would arise as a result of their inclusion. The amendments were also subject to a further public display period in accordance with the requirements of section 24(8) of the Planning and Development Acts 2000, as amended. There were amendments proposed including to the growth and settlement strategy, economy, environment and climate, connectivity, infrastructure, quality of life and placemaking chapters. The resulting *Proposed Material Amendments to the Draft Regional Spatial and Economic Strategy 2019-2030* Report was put on public display between 15<sup>th</sup> March and 12<sup>th</sup> April 2019 along with the accompanying SEA and AA documentation entitled *Environmental Reports*. **Appendix B** to this SEA Statement contains the environmental assessment material which supported the amendment stage of the RSES.

A total of 106 submissions were received on the proposed material amendments. These included submissions from members of the public, government bodies, voluntary and industry groups and statutory consultees. Submissions received from the consultees for SEA are summarised in **Table 5.7**. A transboundary submission was received, summarised in **Table 5.8**. Other environmental issues raised are summarised in **Table 5.9**.

The submissions received were reviewed and responded to in the Director's Report on Proposed Material Amendments [available on EMRA website at <https://emra.ie/material-amendments-directors-report/>]. A series of recommendations in relation to the proposed Material Amendments were made i.e. to accept or reject them. These recommendations were considered by the regional assembly and considered by the SEA and AA teams prior to making of the final RSES. **Appendix B** to this SEA Statement contains the environmental assessment material which supported the amendment stage of the RSES. The Eastern and Midland Regional Assembly at the EMRA meeting on the 3<sup>rd</sup> May 2019 resolved to make the Regional Spatial and Economic Strategy for the Eastern and Midland Region on the 28th June 2019, in accordance with section 24 (9) of the Planning and Development Act 2000.

### 5.4.1 Submissions from Statutory Consultees

**Table 5.7: Material Amendments - Summary of Environmental Issues from the Statutory Consultees**

Consultee	Issue Raised	How this has been addressed in the RSES
Environmental Protection Agency (EPA)	<ul style="list-style-type: none"> <li>EPA noted the environmental assessment findings and recommendations for the Amendments.</li> <li>In finalising the Amendments, all the SEA recommendations should be considered in finalising the RSES and the SEA Statement should provide the reasoning for not integrating recommendations.</li> <li>The RSES should 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.</li> <li>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, and consider potential for cumulative and in combination effects. This recommendation should be reflected in the final RSES.</li> <li>Acknowledge the recommendation that tourism initiatives should consider the requirements of the SEA and Habitats Directives respectively.</li> <li>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.</li> <li>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.</li> <li>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 to ensure they are sustainable.</li> </ul>	<p>Accept the Athlone amendment with minor modification to read as follows: <i>‘A cross boundary statutory Joint Urban Area Plan (UAP) for the Regional Growth Centre of Athlone shall be jointly prepared by Westmeath and Roscommon County Councils in collaboration with EMRA and NWRA...’</i></p> <p>It is noted that legal obligation exists under European Union (EU) SEA Directive and both EU Directive 2009/147/EC (the Birds Directive) and the Habitats Directive in relation to environmental assessments and consideration of plans with the potential to impact on all areas of international conservation interest across the region. Rather than consider this as place-based specific text, RPO 3.2 is modified as follows: <i>‘In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.’</i></p> <p>RPO 4.29: The wording of RPO amended in light of the environmental concerns raised.</p> <p>New RPO Portlaoise: Accept with minor modification to read as follows: <i>‘Support the vision and objectives of the J17 National Enterprise Park Masterplan, where appropriate, which aims to deliver a viable economic zone within Portlaoise which will accommodate a range of potential businesses and industries whilst having regard to spatial planning, infrastructural, environmental and transportation requirements and compatibility with adjoining land uses. This is subject to compliance with the requirements of the SEA, Habitats and Floods Directive.’</i></p> <p>New RPO Graiguecullen-Carlow: The concern raised as part of the accompanying SEA is fully recognised and it is considered that the wording of the material amendment as proposed is inappropriate and falls short of that required to ensure compliance with the relevant environmental and flood risk legislation. Amendment is accepted with minor modification: <i>‘Support the sustainable development of environmentally sensitive, low intensity amenity development</i></p>

Consultee	Issue Raised	How this has been addressed in the RSES
	<ul style="list-style-type: none"> <li>Recommend that the collaboration between adjoining LAs 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.</li> <li>RPO 4.29: 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.</li> <li>Proposed new RPO above 4.43 and new RPO above RPO 4.46 - 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.</li> <li>This also applies to the proposed new RPO under 4.48 - 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.</li> <li>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.</li> <li>Support the SEA recommendations proposed in relation to the new RPO on developing guidance on riparian setback distances (page 68).</li> <li>Proposed new RPO to develop regional-scale open space and recreational facilities - recommend that opportunities to protect, maintain and enhance ecological corridors should also be considered as part of such initiatives.</li> <li>Options to support the All-Ireland Pollinator Plan could also be incorporated as appropriate.</li> <li>Welcome the recommendation that SEA and AA be considered for the proposed regional freight transport strategy.</li> <li>Support the recommendation in RPO 8.16 (improve cycle access to Dublin Airport and surrounding locations) to prepare a mobility management plan.</li> <li>In considering the Amendments, the Assembly 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</li> </ul>	<p><i>associated with the Barrow Blueway subject to compliance with the Habitats and Birds Directive and Floods Directive.'</i></p> <p>New RPO Tourism: In relation to the point on the environment's capacity to absorb additional development and to protect biodiversity, The Director acknowledges potential cumulative and in combination effects to tourism-related plans given the environmental sensitivities within the region. The potential for cumulative and in combination effects are considered as part of the environmental assessment of such plans in accordance with the relevant Directives. As per previous amendments in relation to the strategic development of settlements it is recommended that policy RPO 3.2 is modified to take account of all necessary legal requirements to sensitive environmental sites and a change to be applied throughout the document and additional wording added to RPO 3.2.</p> <p>RPO 7.18: Any future management plan to assist in managing tourism and recreation/ amenity activity will be subject to environmental assessment as affirmed in RPO 3.2. This RPO has been expanded in its proposed amendment to reference the Slieve Bloom Mountains in promoting the development of improved visitor experiences and facilities.</p> <p>New RPO Regional Freight Strategy: Accept with minor modification to read as follows: <i>'To support the preparation of a regional strategy for freight transport in collaboration with the relevant transport agencies and the other Assemblies.'</i></p>

Consultee	Issue Raised	How this has been addressed in the RSES
	<p>in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the RSES.</p> <ul style="list-style-type: none"> <li>• Assembly 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.</li> <li>• Assembly should also ensure that the RSES is consistent with key relevant higher level plans and programmes.</li> <li>• Where further changes to the draft RSES are proposed, these should be screened for likely significant effects in accordance with SEA Regulations.</li> <li>• Once the RSES is adopted, you should prepare an SEA Statement.</li> <li>• A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.</li> </ul>	
<p>Department of Culture, Heritage and the Gaeltacht (DCHG)</p>	<ul style="list-style-type: none"> <li>• The environmental report identifies consequences of the proposed material amendments to RPOs in the draft RSES. The Department recommends the implementation in full of the recommendations in this report.</li> <li>• 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.</li> <li>• In particular, <i>'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.'</i> This should be subject to assessment and cumulative impacts considered. General principle NPS2 should take the above into account in its analysis of peatland uses.</li> <li>• Corridors of suitable peatland habitat may need to be established.</li> <li>• The above Growth Enabler must also be examined for compatibility with Art. 10 of the Habitats Directive.</li> <li>• Proposed new RPO for Graiguecullen-Carlow <i>'Support development of underused lands along the River Barrow.'</i> - the Department supports the recommendation in the Environmental Reports that this RPO not be included in the RSES.</li> <li>• Section 5.8 Item 76. New Guiding Principles for the location of strategic employment - recommend the following amendment in bold: <i>'Suitable locations</i></li> </ul>	<p>The consequences of all material amendments have been considered as part of the NIR; the assessment is reported in Chapter 8 of the NIR for the RSES and with reference to Appendix I of the NIR.</p> <p>Growth Enabler: Accepted amended Growth Enablers for the gateway Region with minor modifications; last bullet reads: <i>'Promote the region as a key destination for tourism, leisure and recreation activities and support the development of an integrated network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced.'</i></p> <p>New RPO Graiguecullen-Carlow: The concern raised as part of the accompanying SEA is fully recognised and it is considered that the wording of the material amendment as proposed is inappropriate and falls short of that required to ensure compliance with the relevant environmental and flood risk legislation. Amendment is accepted with minor modification: <i>'Support the sustainable development of environmentally sensitive, low intensity amenity development associated with the Barrow Blueway subject to compliance with the Habitats and Birds Directive and Floods Directive.'</i></p> <p>Section 5.8 new Guiding Principle: Suggested addition of environmental constraints accepted.</p> <p>RPO 6.16: Accept the proposed amendment with suggested minor modification: <i>'Support the maintenance of, and enhanced access to state and semi-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</i></p>

Consultee	Issue Raised	How this has been addressed in the RSES
	<p><i>(depending on the extent to which an enterprise is people or space intensive or subject to environment constraints).</i></p> <ul style="list-style-type: none"> <li>Amend RPO 6.16 – Natural and Cultural Tourism Assets in bold: <i>‘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 <b>sustainable</b> manner...’</i></li> <li>Unclear why there is an apparent reference to Monuments and Historic Properties in the ownership of the OPW when similar assets are in the ownership of other state/semi-state organisations.</li> <li>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. Suggested that such proposed, and not yet existing greenways, are clearly demarcated as such.</li> </ul>	<p><i>managed in a sustainable manner that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism.</i></p> <p>Section 7.6: The final document includes existing national greenways listed first and an asterisk and footnote to indicate the greenways that are proposed to be developed or under development.</p>
<p>Department of Housing Planning and Local Government (DHPLG)</p>	<ul style="list-style-type: none"> <li>The objective of Amendment 7 (point 4) regarding land uses around the M50 may conflict with national objectives - suggested that <i>‘with a focus on re-intensification and regeneration of lands within the M50, and’</i> should be deleted.</li> <li>Amendment 7 (point 5) expands to <i>‘include district heating and water conservation’</i> may not be suitable for all circumstances. Should be omitted or changed from <i>“to include”</i>, to <i>“which may include”</i>.</li> <li>Premature to address the requirement in Amendment 10 for a Quantitative Assessment of Proposals for Greenhouse Gas Emissions. Not appropriate as currently worded, and given that DHPLG is developing updated Development Plan Guidance to address this. Suggested rewording: <i>“Support the development of a methodology to quantitatively assess the impact of city and county development plan strategies on carbon reductions targets and of measures to monitor and review progress towards implementation of those strategies.”</i></li> <li>Amendment 6 (point 8) and Amendment 11 refer to the classification of “i) Moderate Growth Towns” and “ii) Consolidation Towns” - recommended that the wording set out in the draft RSES (dated January 2019) should not be amended as proposed, as ‘moderate’ is poorly-defined and likely to vary between settlements, also where there may be desirable employment but not</li> </ul>	<p>Amendment 7: Considered appropriate to omit the suggested wording in relation to the M50. Reference to district heating and water conservation omitted in this case.</p> <p>Amendment 10: Accept the proposed material amendment with minor modifications as recommended to be consistent with existing policy response: <i>‘City and County Development Plans shall undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress towards carbon reduction targets.’</i></p> <p>Amendment 6: Accept amendment with minor modification to read as follows: New Headings for Medium to Large Towns to read as i) <i>Self-Sustaining Growth Town</i> and ii) <i>Self Sustaining Town</i>.</p> <p>Amendment 13: Having regard to the submissions received and to the contents of Circular PSSP 6 2010, Guidance Note on Core Strategies, it is not considered appropriate that a policy be included as part of the RSES that could restrict Local Authorities, the OPR, the DHPLG and the Minister to one course of action. Wording accepted with minor modification.</p> <p>Amendment 33: It is fully acknowledged that the RSES is not a mechanism for zoning land and it is not considered that the proposed material amendment is suggestive of this.</p>

Consultee	Issue Raised	How this has been addressed in the RSES
	<p>population growth. Recommend replacing with “self-sustaining growth town” and “self-sustaining town”.</p> <ul style="list-style-type: none"> <li>Amendment 13 proposes to revise Section 4.3 taking Account of Existing Plans to include additional guidance for core strategies to apply prioritisation measures over de-zoning. Concern this is restrictive - suggested that the proposed text be amended to delete “<i>should</i>” and “<i>rather than</i>” and replace with “<i>may</i>” and “<i>and/or</i>” as follows: “<i>Core Strategies may apply prioritisation measures and/or de-zoning of land where a surplus of land is identified in existing plans...</i>”</li> <li>Amendment 33 includes a new RPO for Maynooth – noted there shouldn’t be presumption of development zoning across the boundary in advance of both LAs concluding/agreeing a joint local area planning process, as the RSES not a mechanism for zoning. Add clarification to ensure transparency.</li> <li>Amendment 58: suggested to amend this text to read as follows; “<i>To support Athlone Institute of Technology and examine the need for complementary third level outreach educational facilities to be provided in Tullamore</i>”.</li> <li>Broadly supports Amendment 60, however considered beyond the remit of the RSES as a matter of health policy and respectfully requests the deletion of the text “<i>centre of excellence</i>”.</li> <li>Amendment 73 is proposing to amend the core strategy section of the Dublin MASP to include guidance on population targets. Reasonable to agree as suggested and that agreement can be reached within six months of publication of the approved RSES in order to provide an appropriate level of information necessary for effective review of the relevant City/County Development Plans. Should this timeframe not be possible, recommended to refer the matter to the Minister for further determination.</li> <li>May be beneficial for the Assembly to include additional clarification text as outlined above as follows: “<i>The determination of population targets for local authorities within the MASP in accordance with the NPF and this strategy, including the population targets for the city and the metropolitan key towns, should be agreed in consultation with the MASP Implementation Group, within six months of publication of the RSES to inform the preparation of the core strategies of the relevant city and county development plans. Should it not be possible to reach agreement within the above timeframe, the Assembly will refer the matter to the Minister for further determination.</i>”</li> </ul>	<p>Amendment 58: The proposed suggested narrative changes are noted and will be considered for inclusion as part of the final document where the additions are non-material in nature.</p> <p>Amendment 60: Amendment accepted, the suggested wording amendment from the DHPLG is considered appropriate in this instance.</p> <p>Amendment 73: Accept Amendment, with minor modifications to read as follows: ‘<i>The determination of population targets for local authorities within the MASP in accordance with the NPF and this strategy, including the population targets for the city and the metropolitan key towns, should be agreed in consultation with the MASP Implementation Group, within six months of publication of the RSES to inform the preparation of the core strategies of the relevant city and county development plans. Should it not be possible to reach agreement within the above timeframe, the matter will be referred to the Minister for further determination.</i>’</p> <p>It is noted that NPF NPO 68 is explicitly referenced and included as footnote in the narrative of this section.</p> <p>There are extensive submissions from government departments, state agencies and local authorities that are all stating that the additional rail projects included in the proposed amendments should be rejected and not included in the RSES. On foot of this and given the intrinsic links with proposed amendment no. 69, It is recommended that Amendment 69 be revised as follows, in order to ensure consistency with national transport, spatial development, and public investment policy:</p> <ul style="list-style-type: none"> <li>(ix) Remove reference to the electrification of the rail line further north of Drogheda and further south of Hazelhatch;</li> <li>(x) Alter the reference to the Navan Rail line from “implementation” to “Reappraisal”;</li> <li>(xi) Remove reference to a Mid Term Review of the Transport Strategy;</li> <li>(xii) Alter the reference to Metrolink to “Complete construction of Metrolink”</li> <li>(xiii) Alter the reference to LUAS Green Line to “LUAS Green Line Capacity Enhancement”</li> <li>(xiv) Remove reference to underground rail links to UCD and Knocklyon;</li> </ul>

## REPORT

Consultee	Issue Raised	How this has been addressed in the RSES
	<ul style="list-style-type: none"> <li>The Regional Assembly should ensure that the RSES is fully in accordance to the NPF particularly NPO 68.</li> <li>Parts of Amendments 69, 70, 77, 113 and 114 require adjustment in order to reflect more accurately national transport policy.</li> <li>Some amendments to road and rail projects – while may be of future merit, somewhat premature within the period of this RSES at this point (aspects of MetroLink, Knocklyon, LUAS expansion, N81).</li> <li>Amendments seek to omit Dublin Port Southern Access Route project - reference to this portion of the Southern Access Route project should be included within the RSES.</li> <li>Amendment 99 on a new RPO to develop guidance for riparian setbacks – recommend rewording to: “<i>Support the development of guidance for assessment of proposed.</i>”</li> <li>Amendment 103 amends RPO 7.30 relating to climate change - suggested that the proposed amendment be deleted as matter is being addressed by DCCA.</li> </ul>	<p>(xv) Remove reference to Luas network expansion to Hazelhatch, Booterstown and Blessington;</p> <p>(xvi) Remove reference to an evaluation of underground metro routes inside the M5</p> <p>Amendment 70 revised to include reference to the M50 Dublin Port South Access Route.</p> <p>Amendment 99: The Director supports the Department’s clarification that any such new guidance would be prepared by the relevant national agencies and Departments with input from appropriate stakeholders. With respect to referencing forthcoming guidelines on RBMPs, the preparation of new guidance will require consultation on all related environmental legislation and guidelines and it is not considered necessary to state any individual guidelines as part of the new RPO.</p> <p>Amendment 103: EMRA are committed to carrying out a regional emissions inventory and an amendment to RPO 7.30 will include this initial step of generating an inventory.</p>

### 5.4.2 Transboundary Submissions

**Table 5.8: Material Amendments - Summary of Environmental Issues from Transboundary Submissions**

Consultee	Issue Raised	How has this been addressed in the RSES
Department of Agriculture, Environment and Rural Affairs (DAERA)	<ul style="list-style-type: none"> <li>DAERA Marine and Fisheries Division have suggested the inclusion of cross-border coordination for management of alien invasive species and conservation of native species under Section 7.17: “<i>Facilitate cross boundary (and cross-border?) co-ordination...</i>”</li> </ul>	Invasive alien species are referenced throughout section 7.5 of the RSES, RPO 7.17 highlights the need for management of invasive alien species.

### 5.4.3 Other Environmental Submissions

**Table 5.9: Material Amendments - Summary of Environmental Issues from Other Submissions**

Issues Raised
<ul style="list-style-type: none"> <li>• The NIR requires that the guiding principles for integration of transport planning and land use planning should explicitly reference the protection of the Natura 2000 networks and the ecological linkages which support it.</li> <li>• A submission suggested the proposed new RPO in relation to Water Supply could be simplified to: <i>‘Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Local Authorities and provide for phased infrastructure – led growth that is commensurate with the carrying capacity of water services in order to protect the environment and designated European Networks.’</i></li> <li>• A submission stated that the sentiment of the new RPO for Mullingar is welcomed, however, concern is indicated with regard to the inclusion of this RPO as a location based specific policy and it is suggested that this be better served as a general objective relating to the entirety of the document or omitted.</li> <li>• A submission indicated that the section on Rural Areas could be strengthened through the inclusion of narrative with respect to the after-use of peatlands. Additionally, another submission noted that the reference to Bord na Móna Regional Transition Team needs to be slightly modified in the current RPO for consistent legibility.</li> </ul>
Influence on the RSES
<p>To address these concerns, additional Guiding Principles should be added to the Guiding Principles for Integration of Land Use and Transport, which are aligned with the other policy areas in climate in the RSES. These new guiding principles will satisfy environmental protection requirements and in relation to promoting sustainable transport modes within towns and the assessment of the impact on reaching carbon reduction targets. A bullet adds: ‘... Ensure the protection of Natura 2000 networks and associated ecological linkages. Plans and projects that have the potential to negatively impact on Natura 2000 sites should be subject to the requirements of the Habitats Directive.’</p> <p>In relation to the new RPO for Water Supply, the proposed material amendment was accepted with minor modification to read as follows: ‘Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Local Authorities and demonstrate phased infrastructure – led growth that is commensurate with the carrying capacity of water services and prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.’</p> <p>In the interest of clarity and consistent application of policy across the Region, reference to <i>‘taking account of the proximity of sites of international nature conservation interest’</i> was omitted from the place-based specific text and replaced by an overall general objective, applicable to all locations, which requires that all future strategic development within the administrative area of the RSES takes account of the proximity of sites of international nature conservation interest. On foot of the above proposal and to ensure consistency throughout the document, policy RPO 3.2 is modified to take account of the above change that is to be applied throughout the document and additional wording added to RPO 3.2 to state that: <i>‘In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.’</i></p> <p>The inclusion of narrative with respect to the after-use of Peatlands, given that it is already supported throughout the document, is considered acceptable and appropriate in this instance, having regard to the intention of the RPO and significance of peatland after-use for the Eastern and Midland Region. It is accepted with minor modification to read as follows: <i>‘Support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas. In keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive afteruse framework plan for the peatlands and related infrastructure,</i></p>

## REPORT

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*which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.'*

*In relation to the Bord na Móna Transition Team reference, the material amendment is accepted with minor modification: 'Support collaboration between Local Authorities, the Bord na Mona Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management for a just transition that incorporate any relevant policies and strategies such as the Bord na Mona Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats.'*

## 6 PREFERRED SCENARIO AND REASONS FOR CHOOSING

### 6.1 Introduction

The consideration of alternatives is a requirement of the SEA Directive (2001/42/EC). It states under Article 5(1) that:

*Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.*

Annex 1 (h) of the Directive clarifies that the information to be provided on alternatives under Article 5(1) is *inter alia* an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information. Article 9 of the Directive requires that a statement shall be prepared providing information on the reasons for choosing the plan as adopted, in the light of the other reasonable alternatives dealt with.

Annex 1 (f) details the environmental topics to be considered in the evaluation of the alternatives, which is the same as that addressed in the assessment of the plan itself: biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.

In summary, the Directive emphasises that the SEA process must consider alternatives that are “reasonable”, and take into account “the objectives” of the plan, and “the geographical scope of the plan”.

### 6.2 Approach to Alternatives for the Draft RSES

From the outset it has to be recognised that some strategic alternatives have already been considered and decided upon as part of the higher level planning already undertaken for the NPF. These higher level decisions have set the framework for the RSES to follow. As such the Eastern and Midlands RSES is being formulated in the context of: regional parity for the EMRA, NWRA and SRA; regional concentration toward cities and some regionally important larger settlements; a focus on contained growth and reduced sprawl by targeting infill and brownfield lands in existing built-up areas; and sequential provision of infrastructure with some critical infrastructure in place to promote investment. This high level direction is presented in the NPF as the most sustainable approach to growth patterns.

Good practice points to the need to consider a hierarchy of alternatives which can include elements of discrete alternatives (one alternative versus another) and/or more scenario-driven. Thematic alternatives may also be explored to address specific issues flagged through baseline development. In all cases however, the EPA 2015 guidance on developing and accessing alternatives in SEA stresses the need for alternatives to be: realistic; reasonable; viable; and implementable.

Alternatives discussions were undertaken at two workshops between the RSES Team and the SEA Team in March and July 2018. At these workshops a number of alternative types were discussed with a view to identifying and assessing reasonable alternatives for the EM RSES. A summary of the alternative types discussed is presented in **Table 6.1**.

**Table 6.1: Alternatives Discussed for the draft Eastern and Midland RSES**

Alternative Type	Alternatives Discussed for Eastern and Midland RSES
<b>Strategic</b>	Consolidated urban growth has been identified in the NPF as the preferred national policy approach and this strategic approach has set the framework for the RSES.
<b>Spatial</b>	Alternative locations for the implementation of RSO relevant to the regional level include: <ul style="list-style-type: none"> <li>• Polycentric vs monocentric growth patterns</li> <li>• Ribbon vs node development</li> <li>• Site based alternatives in context of flooding, conservation areas, and contamination.</li> <li>• MASP site options for economy / employment / residential</li> <li>• Settlement strategy for economy / employment / residential</li> </ul>
<b>Value and Effects Orientated</b>	Key issues which were identified in feedback from both the RSES issues paper and the SEA scoping report which address policy and stakeholder priorities include: <ul style="list-style-type: none"> <li>• Climate change and climate resilience</li> <li>• Circular economy and better use of natural resources</li> <li>• Nature based and ecosystem services</li> <li>• Energy security</li> <li>• Better alignment of services with population growth, residential development and economy.</li> </ul>
<b>Sectoral and Temporal Prioritisation</b>	Alternatives that look at sectoral feasibility and needs were identified as those relating to: <ul style="list-style-type: none"> <li>• Alignment of services with population growth, residential development and economy.</li> <li>• Strategic infrastructure delivery timelines e.g. GDD, Water supply, metro</li> </ul>
<b>Modal Alternatives</b>	Different technical/mode alternatives to achieve the same objective include: <ul style="list-style-type: none"> <li>• Renewable energy options</li> <li>• Transport modes</li> </ul>

### 6.2.1 Spatial Based Alternatives

In the first instance the strategic consideration of spatial alternatives was considered in the context of monocentric compared to polycentric approach to growth in the region. The following alternatives were examined in relation to high level spatial based scenarios:

- **Option 1:** Concentrated growth in Dublin plus Athlone, Dundalk and Drogheda;
- **Option 2:** Continued growth of Dublin plus dispersed growth in all large settlements across the region;
- **Option 3:** Continued growth of Dublin plus a limited number of large towns.

Key*	BFF	PHH	W	LS	AQ	CF	MA	CH	LandS
<b>Option 1:</b>	+/-	-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
<b>Option 2:</b>	-	+/-	-	-	-	-	+/-	+/-	-
<b>Option 3:</b>	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

\*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population, Human Health; W- Water; LS- Land and Soils; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; LandS – Landscape

**Assessment:** The spatial options explored in terms of the regional growth strategy looks at growth in a limited number of growth centres, a more dispersed growth throughout a number of towns within the region (>7000) and a more selective growth strategy focused at towns with a larger population base.

From a planning and environment perspective not all options will deliver equal benefit. **Option 1** has the potential to result in further spatial inequities across the region as only Dublin, Athlone and Drogheda-Dundalk see growth. This has the potential to result in long-term direct and indirect negative impacts on PHH and MA as investment is directed away from the majority of settlements in favour of a small number of large settlements. A focus on a small number of large settlements brings potential for both positive and negative impacts on the environment. While consolidated growth offers the greatest opportunity to align services with population and economy, if the existing services do not have capacity then there is potential short to medium term negative impacts until capacity and demand are properly aligned. It is noted that Dublin is experiencing capacity issues in relation to both water and wastewater infrastructure. While projects are ongoing to deliver additional capacity at a large scale, the timelines for delivery of these projects can only be estimated as they are subject to planning. Inadequate services in these limited locations would have significant negative effects on W; BFF and LS in particular as a result of potential for pollution events. Additional pressure on water supplies would also be anticipated from such population growth and this is notwithstanding the additional pressures that the water supply system for the region is likely to come under as a result of future extreme weather events such as the low precipitation levels experienced in Summer 2018. A lack of available water supply would have significant negative impacts for PHH in particularly but also MA where tourism, agriculture, industry and FDI rely on a safe and secure supply of water. Consolidation of population in a small number of settlements can also have indirect impacts on the natural and built environment as a result of increased recreation needs. It is noted that the main locations cited are all in proximity to European sites which are sensitive to disturbance. The carrying capacity of these locations for increased recreational pressure

**Option 2** takes a more dispersed approach and is not strictly in keeping with the national policy approach of urban consolidation. Furthermore, such a dispersed growth pattern is likely to lead to increased encroachment on greenfield and environmentally sensitive sites as well as putting increased pressure on infrastructure and services in the region. The dispersed pattern also limits the potential to develop low carbon solutions in terms of transport in particular as it promotes continued reliance on private car use and limits the potential to achieve critical mass in population density needed for viable public transport solutions. As with Option 1, the capacity of critical infrastructure is a key consideration in relation to growth across a wide settlement base. A number of the small to medium settlements within EMR either lack basic infrastructure for the existing populations or have limited capacity. Similar impacts to Option 1 would be expected in terms of potential for pollution events to impact BFF, W and LS in particular if capacity is not aligned with services.

**Option 3** from a planning perspective promotes selective polycentric development and is likely to produce the greatest socio-economic benefits where a number of self-sustaining growth settlements are identified that have the potential to grow in a sustainable manner while minimising impacts on the receiving environment. The impacts in relation to Option 3 are similar to those outlined for Option 2 unless the settlements brought forward are fully aligned with services capacity in the timelines proposed for the growth to be achieved. It is recognised that some settlements may have a number of positive attributes such as existing availability of good transport links, including public transport but may be lacking other service capacity. In those circumstances, phased growth would need to be applied to ensure that the services capacity was delivered in tandem or in advance of growth.

**Preferred Alternative and Reasons for Choosing:** The preferred alternative in this instance is *Option 3*. This option is likely to achieve the maximum overall gain in relation to the SEOs in terms of maximising infrastructure such as public transport where available and reducing transport related emissions, in tandem with facilitating higher densities in Dublin city and focussed managed growth in supporting settlements, thereby improving regional connectivity and services outside of the city.

### 6.2.1.1 Growth and Settlement Strategy

Following on from the consideration of high level spatial alternatives, consideration was given to ensuring that the future growth in the region is sustainably managed within the capacity of identified settlements. A number of alternatives were considered:

- **Option 1:** Asset-based approach to the identification of settlements; or
- **Option 2:** Growth-potential based approach to the identification of settlements.

Key*	BFF	PHH	W	LS	AQ	CF	MA	CH	LandS
<b>Option 1:</b>	+/-	+	+/-	+/-	+	+	+	+/-	+/-
<b>Option 2:</b>	-	+/-	-	-	-	-	+/-	-	-

\*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population, Human Health; W- Water; LS- Land and Soils; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; LandS – Landscape

**Assessment:** The spatial options explored to inform the region’s growth and settlement strategy consider a planning led (**Option 1**) versus a market led (**Option 2**) deliver of growth and settlement. From a planning perspective there has been a strong recognition of the need to integrate an evidence driven asset-based approach to the identification of settlements which have the greatest capacity and potential for growth and which can act as engines for wider regional growth. Asset based approaches recognise and build on a combination of the social, economic and natural capital that exists and set out an evidence led methodology to identify and enhance the resource potential of a region while ensuring that the future growth is sustainably managed within the capacity of identified settlements. An evidence driven asset-based approach to the identification of settlements as proposed in **Option 1** must focus on the full requirement of settlements and not any one element in isolation. In some areas for example, there may be very good asset base in terms of transport but provision may be lagging behind in terms of wastewater capacity, and in such cases environmental impacts would still occur if the issues were not fully resolved before further growth was proposed.

With a growth led approach (**Option 2**) which is aligned to markets rather than communities, residential and commercial development is likely to repeat historical patterns where commercially strategic landbanks are released even though they do not align with strategically planned infrastructure. The lack of supporting infrastructure in terms of wastewater capacity, sustainable transport options etc. then leads to potential for a cycle of car based culture, environmental deterioration and poor long term outcomes in terms of sustainability. This option has the potential to be attractive in situations where housing need and demand are both high as is the current situation in the region.

The following asset-based criteria were developed to identify an (emerging) spatial hierarchy of settlements in the region:

- Scale – Population, rate of growth and ambition / policy parameters;
- Function – Functional role and service provision;
- Human Capital – Talent and skills;
- Place Making – High quality and vibrant public spaces;
- Ecosystem – Enterprise clusters and networks;
- Connectivity – Transport capacity and accessibility;
- Natural Capital – Environmental sensitivities and assets; and
- Infrastructure – Water, wastewater and utilities capacity.

The NPF has set out targets for population growth for Dublin city and suburbs and for significant growth in the designated growth centres of Athlone, Dundalk and Drogheda. The sustainable growth of remaining large towns, smaller settlements and rural areas is not defined in the NPF but must be within an overall population growth allocation of 540,000 people for the region to 2040. This does not mean that individual settlements cannot develop beyond the generally targeted rate of growth, but that all places cannot, as overall growth within the Region must be consistent with NPF policy.

To inform the development of the draft growth strategy EMRA produced a list of settlements under three settlements typologies: metro; hinterland; and outer. Over 40 settlements were identified. These are listed below.

Metro	Hinterland	Outer
Bray	Ardee	Athlone
Celbridge	Arklow	Athy
Donabate	Ashbourne	Birr
Dublin City and Suburbs	Balbriggan	Carlow
Dunboyne	Blessington	Dundalk
Greystones-Delgany	Clane	Edenderry
Kilcock	Drogheda (incl. south)	Longford
Kinsealy Drinan	Kells	Mountmellick
Leixlip	Kildare	Mullingar
Malahide	Laytown-Bettystown	Portlaoise
Maynooth	Lusk	Tullamore
Portmarnock	Naas	
Swords	Navan	
	Newbridge	
	Portarlington	
	Rathoath	
	Rush	
	Sallins	
	Skerries	
	Trim	
	Wicklow-Rathnew	

For each settlement EMRA compiled information on scale, ambition and capacity for growth, socio-economic function, trip profile, environment and infrastructure asset/ constraints. The SEA team undertook environmental sensitivity analysis for each of the settlements using the AIRO ESM tool and provided information on environmental sensitives to inform the decision making. A spreadsheet of the settlements and relevant planning and environmental considerations is presented in Appendix C to the Environmental Report. A profile of each of the proposed settlements in the growth strategy is presented in **Section 8.3.3** of the Environmental Report. Key issues raised by the environmental sensitivity analysis included availability of wastewater capacity, presence of sensitive and/ or designated habitats, water quality issues, presence of industrial facilities requiring IPC license, discharge licenses and flooding issues.

**Preferred Alternative and Reasons for Choosing:** Based on the analysis of information compiled, EMRA selected a growth and settlement strategy which identified key growth settlements dispersed across the region, located on high quality public transport corridors and with the carrying capacity to support growth. Having regard to the regional variation in the concentration of settlements of scale, concentrated in the eastern part of the region and the relative importance of some smaller settlements that play an important role as market and service towns for their catchments, the growth and settlement strategy identified also proposes moderate growth settlements that have the capacity for continued commensurate moderate growth to become more self-sustaining. The development of all of these settlements is to be fully aligned with asset capacity before or in tandem with growth. Where capacity gaps exist current growth must be phased to reflect realistic deliver of the supporting infrastructure.

Population density is required to create the critical mass required to support infrastructure and employment. Building up the critical mass required to support service provision and employment is required. The identification of moderate growth settlements has the potential to dilute the critical mass needed in key growth settlements. The policy base supporting the growth and settlement strategy must address this issue.

The development of the growth and settlement strategy should ultimately reflect the objectives and vision of the key commitments contained in the UN New Urban Agenda – Habitat iii, which sets a global standard for sustainability in cities. This clearly identifies the linkages between good urbanization and job creation,

livelihood opportunities, and improved quality of life and aligns to the 2030 Agenda for Sustainable Development, especially Goal 11 on sustainable cities and communities.

## 6.2.2 Climate Based Scenarios

- **Option 1:** Climate action achieved through the inclusion of national strategic policies to drive transition to low carbon/climate resilience at the regional level;
- **Option 2:** Climate action achieved through the inclusion of national strategic policies to drive transition to low carbon/climate resilience at the regional level supported by development of a regional green infrastructure and ecosystem services approach to support and enhances opportunities for climate mitigation and resilience; and
- **Option 3:** Climate action achieved through the inclusion of national strategic policies to drive transition to low carbon/climate resilience at the regional level supported by a focus on site based alternatives for adaptation/mitigation in the context of flooding focussed on strategic development locations.

Key*	BFF	PHH	W	LS	AQ	CF	MA	CH	LandS
<b>Option 1:</b>	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
<b>Option 2:</b>	+	+	+	+	+	+	+/-	+	+
<b>Option 3:</b>	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

\*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population, Human Health; W- Water; LS- Land and Soils; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; LandS – Landscape

**Option 1** above represents a business as usual approach to climate and GHG emissions. In a national context, Ireland’s National Policy Position on climate action sets a fundamental national objective to achieve the transition to a competitive, low-carbon, climate-resilient and environmentally sustainable economy by 2050. Specifically, the National Policy Position envisages that policy development will be guided by a long-term vision based on an aggregate reduction in carbon dioxide (CO<sub>2</sub>) emissions of at least 80% (compared to 1990 levels) by 2050 across the electricity generation, built environment and transport sectors; and in parallel, an approach to carbon neutrality in the agriculture and land-use sector, including forestry, which does not compromise capacity for sustainable food production.

At a national level, according to the EPA’s emissions inventory<sup>2</sup> for the period 1990-2016, emissions of GHGs in Ireland are estimated to be 61.55 million tonnes (Mt) carbon dioxide equivalents (CO<sub>2</sub>eq). This is 3.6% higher than emissions in 2015, and represents similar levels to those in 2009. Over the last two years, GHG emissions have risen 7.4% (4.23 Mt CO<sub>2</sub>eq). Emissions from the emissions trading system (ETS, which covers power stations, large industrial plants and airlines) increased by 11.2% (1.78 Mt CO<sub>2</sub>eq) over the same period, while emissions from the non-ETS sector rose by 5.9% (2.45 Mt CO<sub>2</sub>eq). There is strong evidence now that emissions are increasing as a result of economic recovery and employment, particularly in the transport sector, and 7 out of the last 10 years have recorded increases in emissions.

The EPA has also published its Greenhouse Gas Emission Projections for 2017 – 2035.<sup>3</sup> Under the *With Existing Measures* scenario, total emissions are projected to increase from current levels by 1% by 2020 and by 4% by 2030. Under the *With Additional Measures* scenario emissions are estimated to increase by 2% by 2020 and decrease by 1% by 2030. This falls far short of the 20% reduction target by 2020 and indicates that Ireland is not on the right trajectory for achieving the ambitious national target of an 80% reduction on 1990 levels by 2050.

Transport emissions are projected to show strong growth over the period to 2025 with an 18% increase over 2017-2020 and by 20% over 2020-2030. Emissions from agriculture are expected to grow 4% over 2017-2020

<sup>2</sup> EPA (April 2018) Ireland’s Final Greenhouse Gas Emissions 1990-2016.

<sup>3</sup> EPA (May 2018) Ireland’s Greenhouse Gas Emissions Projections 2017-2035.

and by 7% over 2020-2030, reflective of the projected herd population, crop areas, fertiliser use and the impact of Food Wise 2025. The positive impact from current and planned policy measures is being cancelled out somewhat by strong economic growth and outlook. Fossil fuels remain a key contributor to emissions from the power generation sector. It is noted that these projections do not take account of the impact of policy measures arising from the NPF.

The EPA's 2018 projections report indicate a growing emissions trend across most sectors (both with current measures and without) which have exceeded annual limits since 2016. With the current trend, the EPA states that Ireland is not projected to meet the 2020 target of 20% GHG emissions reduction on 1990 levels. A strong and integrated approach across a range of sectors and planning levels, particularly transport and the land use sectors, is required to meet Ireland's EU and International obligations to reduce emissions and to improve air quality.

With this option it is anticipated that there would be some environmental benefit but given the EPA predictions based on current trends with and without additional measures, this option alone will not be sufficient to address national or regional climate targets and additional specific regional actions would be needed to enhance the "business as usual" position.

**Option 2** applies national policy but in addition seeks to develop Green Infrastructure (GI) and Ecosystem Services (ES) solutions at the regional level to actively integrate climate mitigation and adaptation strategies into the regional spatial and economic decision making. GI and ES can deliver biodiversity, population and economic benefits, depending on the focus on policy priorities. For example, Vallecillo et al. (2018)<sup>4</sup> noted that where limited budget applies, a network may be designed to deliver ecosystem services mainly to benefit people but this would have a very different configuration than networks planned to achieve favorable habitat and species conservation status as required by the Habitats Directive. As such, this option needs to look for *win-win solutions* which can benefit a range of policy priorities, in this case climate mitigation and adaptation, protection of nature and provision of green economy opportunities. In EMRA examples includes:

- Development of GI which provides alternative transport options for walking and cycling e.g. greenways which reduces transport related emissions and provides tourism and recreation potential;
- Protection of regional wetlands sites to provide resilience in terms of regulation of future flooding while also providing important habitat for protected and unprotected regional biodiversity;
- Protection of carbon sinks such as forests to mitigation climate effects while providing recreational and nature based opportunities;
- Harnessing renewable energies in the region to offset fossil fuel use and provide increased energy security.

With this option it is anticipated that there would be environmental benefits for all environmental topics.

**Option 3** applies national policy and also addresses site based alternatives for adaptation/mitigation in the context of flooding focussed on strategic development locations. Broadly speaking the focus in this case is on avoiding sites that currently flood or are predicted to flood in the future and / or designing infrastructure which acknowledges future flood risk e.g. raised ground floors. This approach is considered to be reactive rather than proactive in terms of a climate response at the regional level. By focussing on only site based solutions, opportunities to harness national and regional scale opportunities is missed.

**Preferred Alternative and Reasons for Choosing:** The preferred alternative in this instance is a combination of Options 2 and 3. This blended option is likely to achieve the maximum overall gain in relation to the SEOs in terms of maximising opportunities for benefit at the social, economic and environmental level and can deliver several policy priorities simultaneously for the region.

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<sup>4</sup> Vallecillo S. et al. (2018) Spatial alternatives for Green Infrastructure planning across the EU: An ecosystem service perspective

A RSES which leads with a vision for more than the minimum has opportunity to reduce/manage emissions of greenhouse gases and provide/enhance carbon sinks. Climate adaptation measures help to diminish the vulnerability and increase the resilience of a given system or group of systems to existing or anticipated climate change impacts. Climate Change Adaptation options include policy prohibiting building in flood risk areas and near coastal areas vulnerable to current and future erosion; increased flood resilience (e.g. use of SuDS); avoid development which fragments habitats and green spaces, etc. Climate change mitigation could include options to promote efficiencies in transport and land use including: modal shift; reduction in energy consumption; increase energy efficiency and enable generation of renewable energy in appropriate locations; reduce resource use and protect carbon sinks (e.g. peat bogs). This approach demonstrates the potential role of the RSES in addressing global and national environmental agendas.

### 6.2.3 Economic Based Scenarios

- **Option 1:** Specialise and focus on the most competitive sector and channel available sources into this sector.
- **Option 2:** Spread available resources equally to all sectors.
- **Option 3:** Smart specialisation strategies with a focus on the most competitive sectors and clusters development.

Key*	BFF	PHH	W	LS	AQ	CF	MA	CH	LandS
<b>Option 1:</b>	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
<b>Option 2:</b>	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-
<b>Option 3:</b>	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-	+/-

\*Key: BFF – Biodiversity, Flora and Fauna; PHH – Population, Human Health; W- Water; LS- Land and Soils; AQ – Air Quality; CF – Climatic Factors; MA – Material Assets; CH – Cultural Heritage; LandS – Landscape

**Option 1** may significantly overexpose the region to eventual contractions in the business cycles of the chosen sector and lead to significant employment issues in the short to medium term. This would give rise to negative impacts to PHH and MA in particular. Depending on the sectors which are the focus on the alternative, there is the further potential for direct and indirect negative impacts on all environmental receptors if the sensitivity of the receiving environment is not a key criterion in deciding on the regions carrying capacity for the sector activities.

**Option 2** provides a more equal spread of resources which has the potential for positive impacts for PHH and MA in the region as more of the population have the opportunity for employment opportunities locally with indirect positive impacts for AQ and CF from reduced need to travel to employment centres. However this may also give rise to a dilution effect where the critical mass to sustain a sector is not available in terms of resource and/ or skills leading to a net long term loss of competition in a given sector. The greater spread may also lead to inefficiencies given the spread of effort across a higher number of settlements.

**Option 3** offers a compromise between the above options yielding greater value for money. This implies focusing initially on regional capabilities reflected in the most competitive sectors and to expand and diversify indigenous enterprise base. At the same time there is a recognition of the potential benefits of efficiency from clustering, and therefore when economies of scale arise in certain locations they can be facilitated subject to the carrying capacity of the receiving environment. This alternative has the potential for positive impacts for PHH and MA as it builds resilience within the economic base by targeting initially existing regional capabilities while in tandem diversifying the enterprise base. This approach will require coordination with the education sector to ensure the necessary skills mix is available in the region to deliver on the diversification in key sectors. While clustering of enterprise offers obvious benefits in terms of services it can lead to cumulative impacts where the overall environmental limits are not properly factored in to decision making leading to negative effects for environmental receptors e.g. deterioration in water quality from multiple abstractions and/ or discharges to a river system; loss or fragmentation of habitats as a result of construction of infrastructure;

deterioration in air quality and indirectly health outcomes from transport and industry related emissions surrounding such clusters.

### 6.3 Policy Alternatives

Following on from consideration of the strategic alternatives, the RSES and SEA team has considered the alternatives to the strategic objectives and policies set out in the draft RSES. The strategic areas as set out in the draft RSES are:

- Resource efficiency and circular economy;
- Key regional infrastructure;
- Natural capital;
- Energy; and
- Transport.

At the policy level, the alternatives allow for consideration of more detailed issues and how they might influence the subsequent policy actions of the draft RSES. The following sections highlight the main alternatives considered at this policy level and any significant environmental implications.

#### 6.3.1 Resource Efficiency and Circular Economy

Alternative	Description of Scenario	Discussion
<i>Encourage an economy based on resource efficiency and circular economy Alt_1</i>	Enterprises whose activities encourage <i>resource efficiency and circular economy</i> are actively supported by the regional authority.	Traditional industrial models of extraction, production and consumption follow a make-take-dispose linear model where products and goods having reached their end of life are discarded out as waste. For that approach to continue and thrive it assumes resources are plentiful and will constantly be available at low cost prices to meet demand. The circular model alternative focuses on reducing waste and resource loss altogether by re-manufacturing, reusing and recycling materials and products such that one person or industry's waste becomes another's raw material. This approach requires a fundamental shift in how producers and consumers interact in the supply chain.  <i>Enterprises which</i> embrace the idea of a circular economy and promotes indigenous, community and social enterprise can bring significant benefit to the region but opportunities are often not clear at the local level so regional support is needed to both bring potential operators and synergies together and to assist operators and industries in navigating what may be new and / or complex planning and licensing requirements. Supporting opportunities for resource efficiency and circular economy have positive impacts particularly for PHH and MA by providing new and diverse employment opportunities and opening up new avenues for traditional waste products which would otherwise require disposal.
<i>Encourage an economy based on resource efficiency and circular economy Alt_2</i>	Enterprises whose activities encourage specifically encourage <i>resource efficiency and circular economy</i> are not actively supported at regional level	The most obvious alternative here is that these enterprises are left to develop independently and navigate planning and licensing on a case by case basis.  It is likely that such an approach may deter ventures from establishing or may reduce viability of opportunities from unclear processes. The consequences of this would be negative for the environment as more resources are required, more waste is generated and more treatment and disposal

Alternative	Description of Scenario	Discussion
		capacity is required leading to potential negative impacts to the environment generally.

**Preferred Alternative:** The preferred alternative in this instance is *that enterprises whose activities encourage resource efficiency and circular economy* are actively supported by the regional authority. *Alt\_1*.

**Reasons for Choosing:** Environmentally this would have significant, positive long-term effects for air quality, climate and on water quality in particular as it would contribute to a reduced need for new materials and manufacturing/production. The drive for new materials Manufacturing and production can give rise to increased CO<sub>2</sub> emissions and other GHG impacting on climate change and indirectly on populations and health through climate effects such as sea level rise.

Indirectly this would also have positive impacts for biodiversity and human health. As the bulk of our resources are imported, transport related emissions would also reduce with direct positive impacts for air quality and climate and indirect impacts for human health and biodiversity. The move to a resource efficient and circular economy model would likely see an increase in activity in the secondary material market with indigenous reuse/refurbishment activities developing with environmental and social benefits.

### 6.3.2 Key Regional Infrastructure

Alternative	Description of Scenario	Discussion
Infrastructure Alt_1	Delivery of key regional infrastructure precedes development	<p>Services and utility capacity have been reviewed to inform the growth strategies for the EMR. Included in the review are key infrastructure projects which are currently in planning including Metro North, Greater Dublin Drainage and the Water Supply Strategy for the Dublin Region among others. They key infrastructure projects are anticipated to come on line within the timeframe of the EM RSES.</p> <p>In recent years, such large strategic projects have become the focus of intense scrutiny and many have been subject to prolonged appeals process following grant or refusal of permission, including both the Irish courts and European Courts. This has significantly delayed the delivery of anticipated projects. Coupled with this was a “shelving” of key infrastructure projects during the recession which now require them to be revisited and updated to reflect current best practice.</p> <p>While this increased scrutiny and regulation is broadly positive it does have temporal implications for some key projects and as a result the timely and coordinated delivery of services to support growth strategies.</p> <p>Without the key infrastructure there is potential for significant negative impacts on all environmental receptors.</p>
Infrastructure Alt_2	Delivery of key regional infrastructure is not aligned with development	<p>Where such key projects are held up a clear interim approach is needed which clearly outlines a phased delivery of growth in these areas which would not have the anticipated capacity. Without this there is potential for negative impact across all environmental receptors.</p>

**Preferred Alternative:** The preferred alternative in this instance is *that infrastructure precedes development* as per Infrastructure *Alt\_1*.

**Reasons for Choosing:** Economic, social and environmental sustainability must be at the heart of all decision making with a presumption in favour of sustainable development. While it is acknowledged that population increases are needed to create the critical mass required for some service provision, there must be an alignment of capacity with growth. Ensuring delivery of key projects in advance of growth will protect the

receiving environment particularly in terms of emissions to air, water and soil. It must be recognised by EMRA that some of the key infrastructure on which their growth and settlement strategies depend may be subject to a long planning process and interim measures to deal with any shortfalls will need to be planned to prevent loss of service and/ or environmental pollution. The overall strategy should include a policy specifically to plan for interim solutions to key infrastructure deficits.

### 6.3.3 Natural Capital

Alternative	Description of Scenario	Discussion
Biodiversity Enhancement Alt_1	Protection of designated sites [SAC, SPA, (p)NHA] and species at the project level	<p>Potential negative impacts arising from a land use strategy such as the RSES on European and nationally designated sites include loss and disturbance of habitats and species, fragmentation, mortality, pollution of water, soil and air on which protected habitats and species depend, impacts on the integrity of protected sites etc.</p> <p>While this approach acknowledges the need to protect designated sites and species it does not address the wider role they play in regional and national biodiversity and society. On a site by site or individual project basis there is the potential to lose sight of the cumulative benefits and pressures the network of such sites is influenced by. A regional approach offers greatest opportunity to look at the wider benefits and services so they can be valued on a societal basis.</p>
Biodiversity Enhancement Alt_2	Acknowledgement of ecosystem services role for sustainable planning	<p>European and nationally designated sites are a key element of the EMR natural capital and prioritised protection of these sites has direct and indirect positive impacts not only for BFF but also LS, W, AQ, CF, PHH, CH and LandS through the ecosystem services they provide. However, they are under pressure as evidenced by, for example the EU status or protected habitats and species reporting for Ireland. The pressures come from many sources including agriculture, industry recreation, land use planning etc.</p> <p>EU and national legislation is in place to protect the European sites in particular and to a lesser extent national sites (many remain as proposed sites) but pressure remains from infrastructure and development.</p> <p>By understanding the role these sites and species play in social and economic elements of planning there is much greater potential to ensure their long term survival.</p>
Biodiversity Enhancement Alt_3	Provide broad protection policies for designated habitats in keeping with national policy.	<p>This approach will deal to a greater extent with regional issues and potential for cumulative effects than Alt_1 however it does not address integration only protection. Such an approach does not acknowledge opportunities of nature, only constraints to be avoided.</p>

**Preferred Alternative:** The preferred alternative in this instance is *acknowledgement of ecosystem services role for sustainable planning* as Biodiversity Enhancement Alt\_2.

**Reasons for Choosing:** A regional ecosystem services approach offers the greatest potential benefits for BFF as protection and enhancement of biodiversity is likely to accompany the recognition of the service it can provide. A regional ecosystem services map would clearly articulate to planners and developers within the region the nature of these services and how they need to be integrated into decision making. The protection of a robust regional network of sites will have direct long-term positive impacts for BFF, LS, W, CH, LandS and

CF through provision of these ecosystem services including carbon sequestration, water filtration, contaminant removal and nutrient cycling, soil formation, massif landscape, tourism and support for nature.

### 6.3.4 Energy Alternatives

Alternative	Description of Scenario	Discussion
Energy Alt_1	Do Nothing	This alternative relies solely on the unfettered activity of the market responding to the forces of supply and demand for green energy. This approach relies on external agencies and developers to drive the agenda for sustainable low carbon energy resources, and removes most of the control in decision making. This alternative would place the EMR at a distinct disadvantage in terms of achieving low carbon climate resilience.
Energy Alt_2	Focus on wind energy only	<p>This alternative identifies wind energy as the main renewable energy source for the EMR. This would have obvious benefits as it is building on technology that has experience and is evidence base established. It would provide a short to medium term option for to offset current peat fired energy generators in the Region with positive impacts for AQ and CF. It also represents a specialisation which would bring certainty and confidence for developers and planners within the region with positive impacts for MA and PHH.</p> <p>The potential negative impacts of following a single technology such as wind lie in potential for difficulties in delivering the approach where there is a lack of community support. Potential impacts from wind energy on communities include negative impacts on LandS, PHH, BFF, W, LS, CH.</p>
Energy Alt_3	Diversification of renewable energy sources	Diversification of renewable energy sources could include bio-energy, geothermal, solar, off shore wind, wave, tidal, and micro hydro power. By expanding considerations to the widest possible there is greater potential to find the right technology for the right environment with a greater potential for community acceptance and reduced environmental implications. It is also positive for MA as it increased security of supply for the region generally. This approach is also flexible to the needs of urban and rural locations.
Energy Alt_4	Focus on Energy Efficiency and Conservation	This alternative focuses on the demand i.e. how energy use is managed. It relies on improving the energy efficiency of building stock through uptake of incentives and national campaigns for energy efficiency. However this approach alone will not meet the regions share of national targets for energy consumption and greenhouse gas emissions.

**Preferred Alternative:** The preferred alternative in this instance is *a combination of Energy Alt 3 and Alt\_4.*

**Reasons for Choosing:** By focussing on a combined alternative the two sides of energy need can be dealt with - energy demand efficiencies and accessible resources. Any renewable energy policy must first and foremost be supported by rigorous demand side management in the form of energy efficiency and conservation as identified in Alt 4. Alt 3 would reduce the risk associated with relying on one technology, which may be vulnerable to commercial failure, or not supported through national policy, grants or REFIT. This alternative recognises that some technologies are currently in use and other such as offshore energy are being tested and will not be available commercially for some time to come. The mixed technology approach allows for solutions to be tailored to both rural and urban settings.

### 6.3.5 Transport Alternatives

Alternative	Description of Scenario	Discussion
Transport <i>Alt_1</i>	Transport priorities remain focussed on road based solutions. Budgets and resources are used in maintenance and upgrade of the road network	This alternative maintains the status quo wherein despite national policy on sustainable transport, budgets and projects are aligned to maintaining the road network. This approach This alternative would place the EMR at a distinct disadvantage in terms of achieving low carbon climate resilience with resulting negative impacts particularly for CF but also AQ, PHH, BFF, W, LS.
Transport <i>Alt_2</i>	Focus of transport shifts to rail and road based public transport with a view to change over to EVs or other alternative lower emission fuels.	This alternative, to an extent, addresses the shift needed in spatial planning to address national and regional GHG emissions. Both road and rail transport are a necessity in particular in rural areas and these networks must be fit for purpose if transport options such as buses are to be viable alternatives to private car based transport for communities living in these areas. Further focus is needed on electrification of trains and buses to achieve maximum benefit in this regard.  That said, electrification is only positive where the source of the electricity is from sustainable sources and currently this is often not the case with electricity coming from burning of peat in three plants within the EMR.
Transport <i>Alt_3</i>	Prioritisation in land use planning is given to active transport modes i.e. walking and cycling in the first instance with all business and residential development predicated on suitability for active transport	The role for active transport options in land use planning would see a much greater share of journeys made by walking or cycling. This would require location and design of residential and employment opportunities to be <i>stress tested</i> for maximum cycling and walking distances from sustainable transport solutions and support for integration of transport solutions e.g. bike parks at Luas stations, secure bike lockers at train stations, safe well-lit walking and cycling paths between and within developments. Active transport is often seen as something requiring limited planning when in fact it is the opposite. Where schemes have been engaged such as the Dublin Bike Scheme, significant success has been achieved in moving people out of cars and also freeing up capacity on public transport options.

**Preferred Alternative:** The preferred alternative in this instance is Transport *Alt\_3*.

**Reasons for Choosing:** Active transport options provide the greatest benefits from an environmental perspective. They remove transport related emissions leading to improved AQ and CF. They directly improve PHH from increased levels of exercise and indirectly from lowering health risk from emissions to air such as NO<sub>x</sub> and particulate matter, both of which play a role in respiratory and coronary disease. Cycling and walking facilities can also offer opportunities for biodiversity enhancement to the benefit of BFF and PHH. Siting and routing of networks is essential however to avoid negative impacts from disturbance of BFF.

## 6.4 Preferred Alternative and Reasons for Choosing

The preferred strategy for the Eastern and Midlands RSES promotes selective polycentric development policies which identify a limited number of self-sustaining settlements that play a significant role for their catchments and have the assets, capacity and potential to act as engines to drive wider growth based on a diversification of existing economic base and the promotion of smart specialisation and clustering. Policies to accelerate climate action and integrate adaptation/mitigation measures are to be integrated throughout the draft RSES. The selection of growth settlements which have the capacity to promote the greatest socio economic and environmental benefits is informed by the development of an evidence driven settlement typology and asset base for the Region.

## 7 MEASURES TO MONITOR SIGNIFICANT ENVIRONMENTAL EFFECTS OF THE IMPLEMENTATION OF THE ADOPTED RSES

### 7.1 Introduction

Article 10 of the SEA Directive requires that monitoring be carried out in order to identify, at an early stage, any unforeseen adverse effects due to implementation of a plan, and to be able to take remedial action. Monitoring is carried out by reporting on a set of indicators, which enable positive and negative impacts on the environment to be measured. The environmental indicators of relevance to the plan were identified from the SEA process. These will be used to identify unforeseen adverse effects from implementation of the plan.

### 7.2 Responsibility for Monitoring

It is the responsibility of EMRA to coordinate the monitoring of their plan however it is acknowledged that EMRA will, to a large extent, rely on existing monitoring programmes managed by other agencies such as the EPA. It remains the responsibility of EMRA to liaise with these data holders to get the data [EPA, DHPLG, individual local authorities] and to ensure that monitoring reports prepared to report on the status of each indicator presented in **Table 7.1**.

The regional assembly is required, every 2 years, to prepare a monitoring report to monitor progress made in implementing the Strategy including progress made in securing the overall objectives of the regional spatial and economic strategy. These obligations stem from the Planning and Development Act 2000 as amended. As part of reporting obligations under Art. 10 of the SEA Directive, EMRA will, at the same time as the RSES implementation monitoring, prepare an SEA monitoring report on the defined indicators presented in **Table 7.1**. This will be made available to the public.

It is acknowledged that remediation of any unforeseen effects is likely to require a more integrated response across Departments and Agencies to fully establish the correct regional policy response should such effects be identified.

### 7.3 Sources of Information for Monitoring

Monitoring will focus on aspects of the environment that are likely to be significantly impacted by the plan. Where possible, indicators have been chosen based on the availability of the necessary information and to show changes that would be attributable to implementation of the plan. **Table 7.1** presents the environmental monitoring and reporting programme to track progress towards achieving SEOs and reaching targets and includes sources of relevant information.

It is considered good practice to use existing monitoring programmes where relevant rather than duplicating. For example, the EPA undertakes extensive water monitoring which can be readily used by EMRA to monitor their regional plan.

**Table 7.1: Environmental Monitoring Programme**

Potential Issues for Plan Implementation	Monitoring Requirement	Remedial Actions
<b>Biodiversity, Flora and Fauna Guiding Principle: No net contribution to biodiversity losses or deterioration</b>		
<p>The SEA and AA for the EM RSES has identified the following key areas of potential regional concern for BFF:</p> <ul style="list-style-type: none"> <li>• Mainstreaming of biodiversity in lower tier plans to ensure cascading protection down to project level;</li> <li>• Visitor pressures from economic development of tourism sector in the region and from recreational activities associated with growth strategy;</li> <li>• Coastal squeeze resulting from focus of settlements along the north Dublin coast, along with counter pressures from the growing marine sector;</li> <li>• Deterioration of supporting environmental factors, especially water quality, as a result of combined economic and settlement strategies.</li> </ul>	<p>It is proposed to monitor the following indicators to establish both the effectiveness of the protection policies already incorporated into the RSES and also any unforeseen effects:</p> <ul style="list-style-type: none"> <li>• Condition of European sites [data source: NPWS (6 yearly reporting)]</li> <li>• Number of spatial plans that have included ecosystem services content, mapping and policy to protect ecosystem services when their relevant plans are either revised or drafted [data source: Local authorities];</li> <li>• Roll out of SEA and AA on key regional tourism strategies and developments, notably the Ancient East and the Hidden Heartlands [data source: Fáilte Ireland]</li> <li>• Status of water quality in the regions water bodies [data source: EPA].</li> </ul>	<ul style="list-style-type: none"> <li>• Where condition of European sites is found to be deteriorating this will be investigated with reference to the DACG, and the DHPLG for water and the corresponding local authority to establish if the pressures are related to RSES actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.</li> <li>• Where water bodies are failing to meet at least good status this will be investigated with reference to the DHPLG Water Section, the EPA Catchment Unit, the relevant local authorities, and as relevant Irish Water to establish if the pressures are related to RSES actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.</li> </ul>
<b>Population &amp; Human Health Guiding Principle: Improve quality of life for all ages and abilities based on high-quality, serviced, well connected and sustainable residential, working, educational and recreational environments.</b>		
<p>The SEA for the EM RSES has identified the following key areas of potential regional concern for PHH:</p> <ul style="list-style-type: none"> <li>• Phasing of services in parallel with growth in cities, regional centres and key growth towns to ensure sustainable development.</li> <li>• Modal shift from private car to public transport and walking / cycling particularly within MASP area.</li> <li>• Increase by 20% proportion of the population undertaking regular physical activity.</li> </ul>	<ul style="list-style-type: none"> <li>• Programmed delivery of Irish Water infrastructure for all key growth towns in line with their prioritisation strategy and programme to ensure sustainable growth can be accommodated [source: Irish Water]</li> <li>• Proportion of population within (i) the MASP area and (ii) the wider EMR, who report regular cycling / walking to school and work above 2016 CSO figures [source: CSO];</li> <li>• Number of spatial plans that include specific green infrastructure mapping [data source: Local authorities];</li> </ul>	<ul style="list-style-type: none"> <li>• Where planning applications in key growth towns are rejected due to insufficient capacity in the Wastewater treatment Plant (WwTP) or failure of the WwTP to meet Emission Limit Values (ELV), EMRA will coordinate a response between the relevant Local Authority, EPA and Irish Water to achieve the necessary capacity.</li> <li>• Where proportion of population shows increase in private car use above CSO 2016 figures, EMRA will coordinate with the DHPLG, DCCAE and NTA to develop a tailored response.</li> </ul>

## REPORT

Potential Issues for Plan Implementation	Monitoring Requirement	Remedial Actions
<b>Water Guiding Principle: Protection, improvement and sustainable management of the water resource.</b>		
<p>The SEA and AA for the EM RSES has identified the following key areas of potential regional concern for W:</p> <ul style="list-style-type: none"> <li>Deterioration in surface water quality as a result of economic and settlement strategies especially if development is not phased in line with carrying capacity;</li> <li>Deterioration in marine water quality as a result of economic and settlement strategies;</li> <li>Development pressure in areas prone to flooding e.g. Athlone</li> </ul>	<ul style="list-style-type: none"> <li>Status of water bodies as reported by the EPA Water Monitoring Programme for the WFD [data source: EPA].</li> <li>Indicators for descriptors as reported under Article 11 of the MSFD [source: DHPLG and Marine Institute];</li> <li>Number of new housing/development permitted within flood risk areas [data source: local authorities]</li> </ul>	<ul style="list-style-type: none"> <li>Where water bodies are failing to meet at least good status this will be investigated with reference to the DHPLG Water Section, the EPA Catchment Unit, the relevant local authorities, and as relevant Irish Water to establish if the pressures are related to RSES actions / activities. A tailored response will be developed in consultation with these stakeholders in such a circumstance.</li> <li>Where marine water bodies are failing to meet good ecological status this will be interrogated with the Marine Institute and the DHPLG to establish if the pressures are related to RSES activities. A tailored response will be developed in consultation with the MI and DHPLG in such a circumstance.</li> <li>Where planning applications in key growth towns are rejected due to insufficient capacity in the Wastewater treatment Plant (WwTP) or failure of the WwTP to meet Emission Limit Values (ELV), EMRA will coordinate a response between the relevant LA, EPA and Irish Water to achieve the necessary capacity.</li> <li>Where planning applications in key growth towns are being permitted on flood zones, EMRA will work with OPW to educate and inform the relevant local / planning authority on the negative effects of the practice.</li> </ul>
<b>Land and Soils Guiding Principle: Ensure the long-term sustainable management of land.</b>		
<p>The SEA and AA for the EM RSES has identified the following key areas of potential regional concern for Soils:</p> <ul style="list-style-type: none"> <li>Level of contamination in infill areas and appropriate disposal options</li> <li>Contamination of soils and waters and indirect impact on BFF as a result of infill policy</li> </ul>	<ul style="list-style-type: none"> <li>Proportion of population growth occurring on infill and brownfield lands compared to greenfield in each county and cumulatively in EMR [data source: local authorities];</li> <li>Volume of contaminated material generated from brownfield and infill in each county and cumulatively in EMR [data source: EPA waste licenses];</li> </ul>	<ul style="list-style-type: none"> <li>Where the proportion of growth on infill and brownfield sites is not keeping pace with the targets set in the NPF and subsequently the RSES, EMRA will liaise with the relevant local authority to establish reasons and coordinate actions to address constraints to doing so.</li> </ul>

## REPORT

Potential Issues for Plan Implementation	Monitoring Requirement	Remedial Actions
	<ul style="list-style-type: none"> <li>Number of AA determinations and environmental assessments undertaken to support applications for brownfield and infill development prior to planning permission [data source: local authorities / planning authorities].</li> </ul>	
<p><b>Air Quality Guiding Principle:</b> <i>Support clean air policies that reduce the impact of air pollution on the environment and public health.</i></p>		
<p>The SEA for the EM RSES has identified the following key areas of potential regional concern for AQ:</p> <ul style="list-style-type: none"> <li>Increase in transport related air pollution in MASP and in key regional growth centres where modal shift does not accompany population growth and consolidation.</li> </ul>	<ul style="list-style-type: none"> <li>Proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels of 74% [data source: CSO]</li> <li>NOx, SOx, PM<sub>10</sub> and PM<sub>2.5</sub> as part of Ambient Air Quality Monitoring Programme (AAMP) [data source: EPA and DCCAE]</li> </ul>	<p>Where proportion of population shows increase in private car use above CSO 2016 figures, EMRA will coordinate with the DHPLG, DCCAE and NTA to develop a tailored response. See also entry under Population and human health above.</p>
<p><b>Climatic Factors Guiding Principle:</b> <i>Achieving transition to a competitive, low carbon, climate-resilient economy that is cognisant of environmental impacts.</i></p>		
<p>The SEA for the EM RSES has identified the following key areas of potential regional concern for CF:</p> <ul style="list-style-type: none"> <li>The regional policies for de-carbonisation do not achieve emissions savings due to lack of / delay to delivery of support infrastructure such as renewable electricity sources, public transport network</li> <li>Lack of public <i>buy-in</i> to modal shift</li> </ul>	<ul style="list-style-type: none"> <li>City and county development plans will undergo an assessment of their impact on climate reduction policies. This will then be monitored by each local authority. EMRA will monitor progress of each city and county DP towards achieving carbon reduction targets [data sources: each local authority]</li> <li>Proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels of 74% [data source: CSO]</li> </ul>	<ul style="list-style-type: none"> <li>Where trends toward carbon reduction are not recorded in the 2-year interim review of the RSES, EMRA will liaise with the CARO Offices to establish reasons and develop solutions.</li> <li>Where proportion of population shows increase in private car use above CSO 2016 figures, EMRA will coordinate with the DHPLG and NTA to develop a tailored response</li> </ul>
<p><b>Material Assets Guiding Principle:</b> <i>Sustainable and efficient use of natural resources</i></p>		
<p>The SEA for the EM RSES has identified the following key areas of potential regional concern for MA:</p> <ul style="list-style-type: none"> <li>Phasing of services in parallel with growth in cities, regional centres and key growth towns to ensure sustainable development.</li> <li>Modal shift from private car to public transport and walking / cycling particularly within MASP area.</li> </ul>	<ul style="list-style-type: none"> <li>Programmed delivery of Irish Water (IW) infrastructure for all key growth towns in line with Irish Water Investment Plan and prioritisation programme to ensure sustainable growth can be accommodated [source: Irish Water]</li> <li>Proportion of population within (i) the MASP area and (ii) the wider EMR, who report regular cycling / walking to school and work above 2016 CSO figures [source: CSO];</li> </ul>	<ul style="list-style-type: none"> <li>Where planning applications in key growth towns are rejected due to insufficient capacity in the Wastewater treatment Plant (WwTP) or failure of the WwTP to meet Emission Limit Values (ELV), EMRA will coordinate a response between the relevant LA, EPA and Irish Water to achieve the necessary capacity.</li> <li>Where proportion of population shows increase in private car use above CSO 2016 figures, EMRA will</li> </ul>

REPORT

Potential Issues for Plan Implementation	Monitoring Requirement	Remedial Actions
	<ul style="list-style-type: none"> <li></li> </ul>	<p>coordinate with the DHPLG and NTA to develop a tailored response.</p>
<p><b><i>Landscape and Cultural Heritage Guiding Principles:</i></b> <i>Protect and enhance the landscape character; and Safeguard cultural heritage features and their settings through responsible design and positioning of development.</i></p>		
<p>The SEA for the EM RSES has identified the following key areas of potential regional concern for LandS and CH:</p> <p>Impact of tourism growth on receiving environment including:</p> <ul style="list-style-type: none"> <li>deterioration of habitats and disturbance of species from increased visitor numbers and increased access;</li> <li>deterioration of CH features from increased visitor numbers and increased access;</li> <li>introduction of new infrastructure to service increased visitor numbers and access leading to changes in landscape and visual,</li> <li>deterioration in air quality from increased access;</li> <li>deterioration in water quality from increased seasonal pressure in smaller towns and villages.</li> </ul>	<ul style="list-style-type: none"> <li>Working with Fáilte Ireland, monitor roll out of key regional tourism strategies including but not limited to Ireland’s Ancient East and Ireland’s Hidden Heartlands which must be subject to SEA and AA prior to roll-out. This will ensure a strategy specific monitoring is also developed similar to that already underway for the Wild Atlantic Way (WAW) strategy [data source: Fáilte Ireland].</li> <li>Lessons learned from WAW are being addressed in new strategies.</li> </ul>	<ul style="list-style-type: none"> <li>Where monitoring reveals visitor pressure is causing negative effects on key tourist features along these routes, EMRA will work with Fáilte Ireland and other stakeholders to address the pressures through additional mitigation tailored to the plans.</li> <li>Where new tourism strategies do not reflect evidence base and lessons learned from WAW, EMRA will work with Fáilte Ireland to integrate learnings and mitigation.</li> </ul>

## 8 CONCLUSIONS AND NEXT STEPS

The SEA and AA processes carried out during the preparation of the RSES have ensured that the potential significant environmental impacts associated with implementation of the plan have been identified and that these impacts have been given appropriate consideration. Consultation on the draft Plan, Environmental Report, NIR and RFRA has further contributed to the development and finalisation of the adopted RSES.

It is envisaged that monitoring and reporting of environmental impacts, both positive and negative, resulting from implementation of the RSES will continue over the course of the lifetime of the plan.

## 9 ADDENDUM TO THE ENVIRONMENTAL REPORT

### 9.1 Introduction

This is the addendum to the Environmental Report for the Eastern and Midland RSES. This chapter serves two purposes: a) to provide clarification and/or additional information following comments in the submissions received during the consultation period on the draft RSES and Environmental Report; and b) to identify where the Environmental Report has been updated in following consideration of comments received in submissions during public consultation. It should be noted that this document supplements and should be read in conjunction with the original Environmental Report.

The clarifications and additional information contained herein (shown in *italicised blue* text) have been provided in order to increase the usefulness of the document for the public and decision makers. However, the amendments proposed are not of such an extent that changes to the content or outcome of the assessment contained within the Environmental Report will be required.

### 9.2 Amendments by Chapter

#### 9.2.1 Non-technical Summary

The section, *Relevant Aspects of the Current State of the Environment (Baseline)*, in the Non-technical Summary is updated below as per **Section 9.2.3** of this Addendum.

Table 9 (SEA Monitoring Programme) of the Non-technical Summary is updated below as per Table 10.3 in **Section 9.2.5** of this Addendum.

#### 9.2.2 Chapter 4 (Other Plans and Programmes)

The following expanded text paragraphs on legislation are added to Chapter 4:

##### 4.3.10 Maritime Planning and Protection

*The Maritime Spatial Planning Directive also obliges all coastal Member States to establish marine spatial plans (MSPs) as soon as possible and at the latest by 31st March 2021. This will help promote sustainable growth of maritime activities recognising the ever increasing use and exploitation of the maritime space and its resources by a number of sectors such as fishing, shipping, leisure, aquaculture and renewable energy. The RSES will have to align with Ireland's forthcoming [National Marine Planning Framework](#) (in prep and due in 2021) and the MSFD Programme of Measures 2016. Also of relevance in this regard are the policy document *Our Ocean Wealth* and the *Offshore Renewable energy Development Plan*. Together these highlight the challenges Ireland and the regions face with regard to the sustainable use of the ocean resource. [Regard should therefore also be given to the shared marine space and thus potential for transboundary impacts with environmental features in Northern Ireland. The Marine and Coastal Access Act 2009 \(MCAA\) and the Marine Act \(Northern Ireland\) 2013 \(The Marine Act\), require the Department of Agriculture, Environment and Rural Affairs \(DAERA\) as the Marine Plan Authority \(MPA\), to prepare marine plans. To this end, the Draft Marine Plan for Northern Ireland is of relevance to the RSES. Similarly for the ROI plan, it sets out to guide the regulation of the sustainable use, management and protection of the marine area. The Marine Plan has been developed within the framework of the UK Marine Policy Statement \(UK MPS\).](#)*

##### 4.3.11 Land Use

*The land use, land use change and forestry (LULUCF) sector is also increasingly being recognised as playing a large role in how GHG emissions are reported; this sector considers emissions and removals from six categories including forest land, cropland, grassland, wetland, settlements and other land. The LULUCF sector is a net carbon sink within the EU but increasing anthropogenic activities in this sector can contribute to both emissions and removals of carbon dioxide (CO<sub>2</sub>). Due to the complexities on emissions reporting for this sector, emissions and removals from LULUCF were not currently counted towards the EU's 20% by 2020 GHG*

emissions reduction target, but count in part towards the EU's Kyoto Protocol and UNFCCC limitation of emissions and reduction commitments. The EU Regulation on the inclusion of GHG emissions and removals from LULUCF was therefore adopted in May 2018 as part of the 2030 Climate and Energy Framework. Under the regulation, Member States must ensure that GHG emissions from LULUCF are offset by at least an equivalent removal of CO<sub>2</sub> from the atmosphere in the period 2021-2030.

### 9.2.3 Chapter 5 (Characteristics of the Current State of the Environment - Baseline)

#### Section 5.1.1 State of the Environment Overview – Republic of Ireland

The following update to the EEA reference is made:

**Table 5.3 – Summary of Current State of the Environment in Ireland (2016)**

Theme	Key Findings
Air Quality and Transboundary Air Emissions	... A 2018 European Environment Agency (EEA) report indicates that around 1,150 deaths in Ireland in 2015 were directly linked to air pollution, mainly due to fine particulate matter (PM <sub>2.5</sub> ) ...

#### Section 5.1.2 State of the Environment Overview – Northern Ireland

The following update to number of monitoring stations is made:

**Table 5.4 – Summary of the Current State of the Environment in Northern Ireland**

Theme	Key Findings
Air	There are 19 air quality monitoring stations in Northern Ireland...

#### Section 5.2.2 Biodiversity, Flora and Fauna

The following bullet is added to the list of key issues for biodiversity, flora and fauna:

The key issues associated with the development of draft Eastern and Midland RSES and biodiversity relate to:

- Potential for transboundary impacts with protected habitats and species in Northern Ireland, particularly through hydrological (including marine) and/or atmospheric pathways.

##### Section 5.2.2.1 Designated Sites

The following updates are made to the numbers of protected/ designated sites in Northern Ireland:

In Northern Ireland there are 58 SACs (one of which is an offshore SAC), 17 SPAs (one of which is offshore, the Irish Sea Front),<sup>11</sup> 21 Ramsar sites and 394 Areas of Special Scientific Interest (ASSIs). The ASSIs are areas of land with national conservation value. Further, an extension to an existing European Site, two additional European Sites and one National Site were recently adopted under the Marine Act (Northern Ireland) 2013 which are in close proximity to transboundary waters: boundary extension to Carlingford Marine SPA, East Coast Marine Proposed SPA (pSPA), North Channel Proposed SAC (pSAC) and Carlingford Marine Conservation Zone (MCZ). In addition, DAERA is currently consulting on two additional proposed Ramsar sites: Derryleckagh and Teal Lough. Some designations in the Eastern & Midland Region, such as Carlingford Lough SPA and Carlingford Shore SAC, extend into Northern Ireland and as such present potential for transboundary effects.

<sup>11</sup> Source: JNCC GIS data download April 2019, spreadsheet UK\_Natura2000\_2019-03-26, and DAERA submission on the Draft RSES.

### **5.2.2.7 Invasive Alien Species**

The following text is added to this section in recognition of the potential for transboundary impacts:

*If an invasive species e.g. giant hogweed and Japanese knotweed, becomes established it can be difficult, or in some cases nearly impossible, to eradicate. Construction and demolition waste, such as that generated through development, in particular of brownfield sites, has the potential to spread invasive species. There is potential for transboundary impacts associated with the introduction or spread of IAS and development in the border area (such as in ports and for infrastructure development), through both terrestrial and aquatic pathways.*

### **Section 5.2.2.8 Existing Environmental Pressures/ Problems: Biodiversity, Flora and Fauna**

A new paragraph is added under this section to address some of the issues raised in submissions on coastal erosion:

*The effects of climate change are being felt across sectors and impacting on different aspects of the environment, with key interrelationships noted in respect of water aspects in particular. The NPWS Sectoral Climate Change Adaptation Plan published for consultation in February 2019 notes key impacts on biodiversity resulting from climate change, including: severe temperatures (heat waves and freezing conditions) impacting species; erosion of habitats (soil, coastal) from dry weather and from wave and tidal action, storm surges and rising sea levels; altered water tables, droughts and water shortages causing physiological impacts, desiccation or death for flora and fauna; increased risk of wildfires damaging habitats and species. Development, population and economic growth can all contribute to cumulative impacts on the environment, which may be exacerbated by the effects of climate change in the absence of any mitigation and adaptation.*

### **Section 5.2.3 Soils, Geology and Hydrogeology**

#### **Section 5.2.3.2 Land Cover**

The following is added on forestry for further information:

*More detailed data is available on licence from the OSi via the PRIME2 spatial reference framework,<sup>5</sup> as well as sectoral-specific data for agriculture (DAFM's Land parcel Identification System) and forestry (Forest Service and Coillte data on forest assets). Ireland is noted to have a relatively low percentage of forest cover (11% or approx. 770,000 ha) compared to other EU countries (average 43%). About half of forests are in public ownership. Ireland's forest estate is also relatively young, with 44.9% of the stocked estate being less than 20 years of age.<sup>6</sup>*

### **Section 5.2.5 Air Quality and Climatic Factors**

#### **Section 5.2.5.2 Greenhouse Gases**

The following clarification on adopted regulations for the LULUCF sector is added:

#### **Republic of Ireland Greenhouse Gas Emissions and Projections**

*Considering the commitment to shift to a low-carbon, competitive and sustainable economy by 2050, the LULUCF sector now needs to be considered as part of a holistic approach to reducing emissions from all sectors. In relation to this, the following the following directives and amendments are of relevance:*

- *Decision 529/2013/EU on accounting rules on greenhouse gas emissions and removals resulting from activities relating to land use, land-use change and forestry and on information concerning actions relating to those activities;<sup>7</sup>*

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<sup>5</sup> <https://www.osi.ie/about/future-developments/prime2/>

<sup>6</sup> *DAFM submission on the Draft RSES.*

<sup>7</sup> <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A32013D0529>

- [Regulation of the European Parliament and of the Council on the inclusion of greenhouse gas emissions and removals from land use, land use change and forestry in the 2030 climate and energy framework, and amending Regulation \(EU\) No 525/2013 and Decision No 529/2013/EU.](#)

The following updates are made to the baseline information for Ireland's greenhouse gas emissions based on the latest report (December 2018) from the EPA:

At a national level, according to the EPA's [provisional emissions inventory](#)<sup>8</sup> for the period 1990-2017, emissions of GHGs in Ireland are estimated to be 61.75 million tonnes (Mt) carbon dioxide equivalents (CO<sub>2</sub>eq). This is 0.9% lower than emissions in 2016, however that is following a 3.5% increase for that year compared to 2015. The slight reduction seen for 2017 is due mainly to mild weather conditions and the resultant decrease in demand from residential heating and the influence of increased renewable electricity generation. Over the last three years, GHG emissions have risen 6.4% (3.65 Mt CO<sub>2</sub>eq). Emissions from the emissions trading system (ETS, which covers power stations, large industrial plants and airlines) increased by 5.9% (0.94 Mt CO<sub>2</sub>eq) over the same period, while emissions from the non-ETS sector (covered by the [EU Effort Sharing Decision](#)) rose by 6.6% (2.7 Mt CO<sub>2</sub>eq). There is strong evidence now that emissions are increasing as a result of economic recovery and employment, particularly in the transport sector, and while 7 out of the last 10 years have recorded increases in emissions, 2 of the last 3 years have seen increases. Agriculture remains the single largest contributor to the overall emissions at 33.3% of the total. [Transport and Energy Industries](#) are the second and third largest contributors at 19.8% and 19.3% respectively. Emissions from the Residential and Manufacturing Combustion sectors account for 9.4% and 7.7 % respectively. The remainder is made up of Industrial Processes (3.7%), F-Gases (2.0%), Waste (1.5%), Commercial Services (1.8%) and Public Services (1.5%). Between 1990 and 2017, Transport shows the greatest overall increase of any sector at 133.2%. As of 2016, the European Environment Agency reported that Ireland has the [fourth-highest per capita GHG emissions \(12.94 t CO<sub>2</sub>eq\)](#) in the EU-28 (behind Luxembourg, Estonia and Iceland).<sup>9</sup>

## Section 5.2.6 Material Assets

### Section 5.2.6.4 Water Supply

The following updates are made to the baseline information for water supplies based on the latest water quality reports (2018) from the EPA:

Nationally, the majority (99.9%) of public water supplies (PWS) comply with microbial standards, 99.6% comply with chemical standards and 98.91% comply with indicator standards.<sup>10</sup> Further, [at the start of 2017 there were 42 boil water notices nationally \(related to turbidity, Cryptosporidium, E. coli\); at the end of 2017, this was down to seven bold notices affecting just 41 people.](#) There were also [four water use restrictions in place during 2017](#) (e.g. presence of heavy metals, PAHs); [9 boil notices/water restrictions](#) occurred within the region. At the end of 2017, 13 PWS in the region were listed on the EPA's remedial action list where most issues relate to inadequate treatment for microbial pathogens and trihalomethanes as well as treatment and management issues. Around 20% of Ireland's population are serviced by a private water supply. Water quality is consistently poorer in private water supplies compared to public supplies; in 2016 96.7% of private group schemes and 95.7% of small private supplies nationwide were compliant with E. coli standards. There were [168 boil notices nationwide for private supplies in 2017, of which 38 were in the region \(36 of these in Wicklow alone\)](#).<sup>11</sup> The EPA notes that some of the strategic objectives for drinking water include the elimination of boil water notices, implementation of action programmes to improve treatment of trihalomethanes (used as industry solvents and refrigerants) and progression of drinking water safety plans.

<sup>8</sup> EPA (December 2018) Ireland's [Provisional Greenhouse Gas Emissions 1990-2017](#).

<sup>9</sup> EEA Country Profiles – greenhouse gases and energy (November 2017): <https://www.eea.europa.eu/themes/climate/trends-and-projections-in-europe/trends-and-projections-in-europe-2017/country-profiles-greenhouse-gases-and-energy> [Accessed July 2018]

<sup>10</sup> EPA (2018) [Drinking Water Report for Public Water Supplies 2017](#).

<sup>11</sup> EPA (2018) [Focus on Private Water Supplies 2017](#).

**Section 5.2.7 Cultural Heritage**

The following bullet is added:

*The key issues associated with the development of the draft RSES and cultural heritage relates to:*

- *To preserve and protect the cultural heritage including architecture, archaeology and cultural heritage from unsustainable development;*
- *Impacts on archaeological features and setting; and*
- *Impacts for underwater archaeological features during construction of new infrastructure and/ or upgrades.*
- *Consideration of impacts to heritage sites and their cultural/historic setting in the border area, particularly cross-border assets and those adjacent to the border (both at county level and with Northern Ireland).*

**Section 5.2.7.2 Other Heritage**

The following note on the availability of transboundary heritage data is added for information:

*Given the regional and strategic scope of the plan, it is recognised that impacts to heritage and setting, including those of a transboundary nature, are more appropriately assessed at project level. However it should be noted that much digital data is available for examination from Northern Ireland, including for monuments, listed buildings, areas of archaeological potential, historic houses etc. which can be sought at: <https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets>*

**Section 5.2.8 Landscape**

**5.2.8.2 National Landscape Character Assessment**

The following note on the availability of transboundary landscape data is added for information:

*The strategy outlines six key objectives and actions, one of which is to develop a National Landscape Character Assessment. It is proposed that Landscape Character Assessments will be prepared at local and intra-local authority level. These regional and local landscape character assessments will inform and guide landscape policy, action plans and local authority development plans. In the absence of a national landscape character assessment then the CORINE Land Cover Map is used as a proxy for the purposes of landscape as can be seen in Figure 5-14 (see Appendix B, Vol. II). Northern Ireland has undertaken regional landscape and seascape character assessments. Digital data is available from DAERA at: <https://www.daera-ni.gov.uk/articles/download-digital-datasets>*

**9.2.4 Chapter 8 (Assessment of Preferred Scenario)**

**Section 8.3.3.4 Regional growth Centres – Dundalk**

The following additions are made to the Environmental Constraints list under Dundalk in further recognition of transboundary sites and the potential for transboundary impacts to protected/ designated sites with Northern Ireland:

<b>Assessment and Discussion: Dundalk</b>
<p><b>Key Constraints:</b></p> <ul style="list-style-type: none"> <li>▪ SAC &amp; SPA: Dundalk Bay; Dundalk Bay; Carlingford Shore SAC; Rostrevor Wood SAC (across Carlingford Lough in NI)</li> <li>▪ Ramsar Site: Carlingford Lough (in NI)</li> <li>▪ pNHA: Dundalk Bay; Drumcah, Toprass &amp; Cortial Loughs; Carlingford Mountain</li> <li>▪ Nature Reserve (NI): Rostrevor Forest (across Carlingford Lough)</li> <li>▪ ASSI's (NI): Carlingford Lough, Rostrevor Wood, Clermont &amp; Anglesey Mountain</li> </ul>

**9.2.5 Chapter 10 (Mitigation and Monitoring)**

**10.4 Monitoring**

The *Proposed Environmental Monitoring Programme* is updated for *Objective 5 - Air Quality* as follows:

**Table 10.3 – Proposed Environmental Monitoring**

<b>Guiding Principle (see Chapter 6 for applicable SEO)</b>	<b>Target</b>	<b>Indicator</b>	<b>Data Source</b>
<p><b>Objective 5 Air Quality</b></p> <p>Support clean air policies that reduce the impact of air pollution on the environment and public health</p>	<ul style="list-style-type: none"> <li>▪ Decrease in proportion of journeys made by private fossil fuel-based car compared to 2016 National Travel Survey levels.</li> <li>▪ Improvement in Air Quality trends, particularly in relation to transport related emissions of NO<sub>x</sub> and particulate matter.</li> <li>▪ Reduction in emissions and ambient concentrations of NO<sub>2</sub>, NO<sub>x</sub>, PM<sub>10</sub> and PM<sub>2.5</sub>.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Percentage change from 2016 position of 74% car modal share.</li> <li>▪ Achievements of the Key Performance Indicators outlined in the National Clean Air Strategy.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Central Statistics Office, National Travel Survey</li> <li>▪ Department of Transport Tourism and Sport, Transport Trends (DTTAS)</li> <li>▪ Department of Communication Climate Action and Environment (DCCAE)</li> <li>▪ EPA Ambient Air Network</li> </ul>

## **Appendix A**

### **Environmental Mitigation Measures and how these have been addressed in the RSES**

# 1 PROPOSED MITIGATION MEASURES

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
Strategic Vision	<ul style="list-style-type: none"> <li>▪ An explicit RSO should be included to protect and manage the Natura 2000 network.</li> <li>▪ The requirements of Article 10 of the Habitats Directive are not specifically considered under the AA process (except in so far as they support a qualifying feature) but it is recommended that the EMRA includes a specific RSO which addresses the ensures that ecological connectivity within the Plan area is maintained or improved, which will in turn improve the coherence of the Natura 2000 network.</li> <li>▪ Develop an ecological resource map for the region.</li> </ul>	<p>The RSES sets out 16 Regional Strategic Outcomes (RSOs) informed by and closely aligned and supportive with the National Strategic Outcomes (NSOs) of the National Planning Framework and the UN Strategic Development Goals. These have also been developed in iteration with the Strategic Environmental Outcomes of the SEA process. In this regard, RSO 11 ‘Biodiversity and Natural Heritage’ (aligning with NSO 7 and 8) “<i>promotes co-ordinated spatial planning to conserve and enhance the biodiversity of our protected habitats and species including landscape and heritage protection</i>”. In addition to the RSO, there are a number of key Regional Policy Objectives which give specific support and protection to biodiversity and these are set out in Section 7.5.</p> <p>In particular, <b>RPO 7.16</b> states: <i>support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</i></p> <p>Further, the RSES has developed suites of Guiding Principles with key environmental considerations at the forefront to improve and protect ecological connectivity (Guiding Principles in the preparation of Green Infrastructure Strategies, Guiding Principles in the consideration of development on peatland areas). <b>RSO 11</b>, its corresponding RPOs and Guiding Principles encapsulates the commitment of the RSES to biodiversity protection in line with international, EU and national policy.</p> <p><b>RPO 7.15</b> states: <i>Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.</i></p> <p><b>RPO 7.16</b> states: <i>Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</i></p> <p><b>RPO 7.17</b> states: <i>Facilitate cross boundary co-ordination between Local Authorities and the relevant agencies in the Region to provide clear governance arrangements and coordination mechanisms to support the</i></p>

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
		<p><i>development of ecological networks and enhanced connectivity between protected sites whilst also addressing the need for management of alien invasive species and the conservation of native species.</i></p> <p>The RSES will provide an ecological resource map for the region identifying designated sites.</p>
<p><b>Growth Strategy and People &amp; Places</b></p>	<p><b>Mitigation Applicable to All Growth Settlements:</b></p> <ul style="list-style-type: none"> <li>▪ Phasing of services in tandem with growth and settlement is essential to avoid adverse impacts on the integrity of water dependent habitats and species within the Natura 2000 network.</li> <li>▪ In order meet the increased demands on the water supply and prevent adverse impacts on the integrity of water dependent habitats and species within the Natura 2000 network, due consideration should be given to the suitability of new and/or existing drinking water sources e.g. hydromorphological pressures.</li> <li>▪ Selection of sites for regeneration and expansion should be supported by a quality site selection process and subject to detailed environmental assessment.</li> <li>▪ A set of site selection criteria should be developed by EMRA to assist local authorities in decision making. This should include explicit consideration of the potential for likely significant effects as a distinct criterion for short-listing of site and if necessary the potential of sites to avoid adverse effects on the integrity of any European site.</li> <li>▪ Policy wording in the RSES shall recognise that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</li> <li>▪ The Joint Area Action Plans should explicitly consider potential for impact pathways in relation to European sites and the potential for ex-situ impacts. Action plans will ensure no adverse effects on the integrity of any European site as a key objective.</li> </ul> <p><b>Specific Mitigation for the Regional Growth Centre:</b></p> <p><u>Dundalk</u></p> <ul style="list-style-type: none"> <li>▪ The Dundalk wastewater treatment plant is operating within its design capacity and is considered to have sufficient headroom. The plant,</li> </ul>	<p>The Joint Area Action Plans will be subject to their own environmental assessments which will have regard to the necessary environmental legislation, as what is required similar to a Local Area Plan.</p> <p>The RSES recognises that where other strategies and plans undergo review or changes to reflect the national and regional policy objectives and outcomes of both the NPF, and subsequently the RSES, they should also consider any relevant environmental requirements. The RSES explicitly states that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network (See Chapter 3 Growth Strategy - Assessment of Possible Impacts – Environmental Assessment).</p> <p>The narrative explicitly states that at the project consent stage, if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated, then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect. This statement is accompanied by <b>RPO 3.4 and 3.5</b> detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p><b>RPO 4.23</b> states: <i>Enhance potential for economic development and regeneration at Dundalk Port / Harbour area subject to a feasibility study and appropriate coastal zone management.</i></p>

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
	<p>however, is listed as a Priority Urban Area and is failing more stringent treatment standards. As such, population growth needs to be phased alongside improvements to wastewater treatment.</p> <ul style="list-style-type: none"> <li>▪ The expansion of activities associated with ports and marinas such as identified for Dundalk will require a feasibility study to be undertaken in the first instance and recognition that in the absence of coastal zone management, there is potential negative impacts to European sites.</li> <li>▪ An Urban Area Action Plan, which is cognisant of transboundary Local Government Authorities in Northern Ireland (Newry, Mourne and Down) should explicitly consider potential for impact pathways in relation to European sites and the potential ex-situ impacts.</li> </ul> <p><b>Specific Issues/ Mitigation for the Key Growth Towns:</b></p> <p><u>Swords</u></p> <ul style="list-style-type: none"> <li>▪ In considering specific developments for the Swords area, it is important that consideration of the wider MASP objectives, which may not be under the control of the Local Authority are taken on board, particularly with respect to in-combination impacts.</li> </ul> <p><u>Maynooth</u></p> <ul style="list-style-type: none"> <li>▪ The primary emission point for the Maynooth wastewater is elsewhere as part of the Lower Liffey Valley Regional Sewerage Scheme. However there is storm water overflow to the Rye water, a river whose WFD status is Poor and At Risk. Increasing population growth in Maynooth should be planned on a phased basis in collaboration with Irish Water and the local authority to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to cumulative degradation of water quality.</li> </ul> <p><u>Navan</u></p> <ul style="list-style-type: none"> <li>▪ The primary emission point for the Navan wastewater treatment plant is noted to discharge to a section of the River Boyne which is at Moderate WFD status and At Risk of not meeting WFD objectives, and is also a designated Nutrient Sensitive River as a result of the wastewater outfall. Increasing population growth should be planned on a phased basis in collaboration with Irish Water and the local authority to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality.</li> <li>▪ Any development within the River Boyne and Blackwater SAC/SPA and pNHA as part of the Boyne Greenway should consider all likely significant</li> </ul>	<p><b>RPO 7.16</b> states: <i>Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</i></p> <p><b>RPO 4.2</b> states: <i>Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</i></p> <p><b>RPO 7.12, 7.13, 7.14 and 7.15</b> deal specifically with the requirements around Flood Risk to ensure compliance with national guidelines and in respect of managing and reducing flood risk and the protection of environmentally sensitive sites and habitats.</p> <p>Further, the RSES will include an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.</p> <p>In addition, a suite of Guiding Principles in the RSES further aid plan preparation and decision making in the region. With respect to Core Strategies Local Authorities are required to have due regard to the settlement typology of towns in the region and carefully consider the phasing of development lands to ensure that towns grow at a sustainable level appropriate to their position in the hierarchy. <b>RPO 4.2</b> provides that: <i>Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</i></p> <p><b>RPO 3.7</b> states that: <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National</i></p>

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
	<p>effects. It is noted that the RPO for the extension of the Boyne Greenway state that this is subject to the outcome of the planning process and environmental assessments.</p> <p><u>Naas</u></p> <ul style="list-style-type: none"> <li>▪ Population growth targets within the catchment areas being served by the Upper Liffey Valley Sewerage Scheme/Oberstown Wastewater Plant, which includes Naas as well as other towns, should have regard to the status and progress of the planned upgrades to the plant and other network elements, which will be subject to the outcomes of the planning process, to ensure the protection of the environment and water quality.</li> </ul> <p><u>Wicklow-Rathnew</u></p> <ul style="list-style-type: none"> <li>▪ With regard to the enhancement and expansion of Wicklow port and harbour, to expand commercial berthing and pleasure craft capacity, a study will be undertaken on its feasibility, with particular focus on avoiding adverse impacts on the integrity of adjacent European Sites.</li> </ul> <p><u>Mullingar</u></p> <ul style="list-style-type: none"> <li>▪ Mullingar treatment is noted to be currently operating within capacity. Increasing population growth should be planned on a phased basis in collaboration with Irish Water and the local authority to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality.</li> </ul> <p><u>Tullamore</u></p> <ul style="list-style-type: none"> <li>▪ The primary emission point for the Tullamore wastewater treatment plant is noted to discharge to a section of the River Tullamore which is at Poor WFD status and At Risk of not meeting WFD objectives, and is also a designated Nutrient Sensitive River as a result of the wastewater outfall. Increasing population growth should be planned on a phased basis in collaboration with Irish Water and the local authority to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality.</li> </ul> <p><u>Carlow (Graiguecullen)</u></p> <ul style="list-style-type: none"> <li>▪ With respect to the co-ordinated cross-boundary joint UAP by Carlow and Laois County Councils, regard shall be had to the respective housing, retail and other Local Authority strategies that may be in place.</li> </ul>	<p><i>Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i></p> <p>For Wicklow and the policy on harbour expansion, <b>RPO 4.56</b> states: <i>Support enhancement and expansion of Wicklow port and harbour, to expand commercial berthing and pleasure craft capacity subject to a feasibility study with particular focus on avoiding adverse impacts on the integrity of adjacent European Sites.</i></p> <p>In terms of water quality <b>RPO 7.11</b> states: <i>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.</i></p> <p>In terms of water supply:</p> <p>New <b>RPO 10.6:</b> <i>Delivery and phasing of services shall be subject to the required appraisal, planning and environmental assessment processes and shall avoid adverse impacts on the integrity of the Natura 2000 network.</i></p> <p>New <b>RPO 10.7:</b> <i>Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Planning Authorities and demonstrate phased infrastructure led growth to meet demands on the water supply, suitability of new and/or existing drinking water sources (for example hydromorphological pressures) and prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.</i></p>

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
		<p>With regards to urban infill and brownfield sites, Guiding Principles deal with the complexities of these sites including development capacity, constraints, site risks and contamination.</p> <p>All plans are subject to AA when prepared. This will ensure avoidance of adverse effects on the integrity of European Sites in the first instance and mitigation measures if required.</p>
<p><b>Dublin Metropolitan Area Strategic Plan (MASP)</b></p>	<ul style="list-style-type: none"> <li>▪ <b>RPO 5.6:</b> The RPO should stipulate that the identification of suitable employment sites shall be supported by a quality site selection process that addresses environmental concerns which shall include the potential for likely significant effects on European sites</li> <li>▪ <b>RPO: 5.8:</b> The NTA Cycle Network Plan has assessed the potential adverse effect of the routes identified and mitigation measures have been developed to address negative effects. The RSES should stipulate that support for these routes is subject to compliance with the mitigation measures as outlined in the NIS for the NTA strategy.</li> </ul>	<p>The RSES explicitly states that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network (Chapter 3 Growth Strategy - Assessment of Possible Impacts – Environmental Assessment).</p> <p>The narrative states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated, then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect. This statement is accompanied by <b>RPO 3.4 and 3.5</b> detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate. <b>RPO 3.5</b> states that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>All plans are subject to AA when prepared. This will ensure avoidance of adverse effects in the first instance and mitigation measures if required. Any mitigation measures arising from the AA of these plans must be carried through to project stage. A stipulation stating compliance with these mitigation measures is not required to be reiterated in this strategic document.</p>
<p><b>Economy and Employment</b></p>	<ul style="list-style-type: none"> <li>▪ <b>Economic Base:</b> The region will develop and apply guiding principles for the protection of the Natura 2000 network and the avoidance of adverse effect on integrity of European sites.</li> <li>▪ <b>Sustainable Development:</b> Specific reference should be made to potential for adverse effects on European sites as one of the issues to examine in RPO 6.2</li> <li>▪ <b>Rural Economy:</b> Local economy and community plans are subject to AA when prepared. This will ensure avoidance of adverse effects in the first instance and mitigation measures if required.</li> </ul>	<p>Guiding principles for the location of strategic employment includes the following amendment: <i>Suitable locations (depending on the extent to which an enterprise is people or space intensive or subject to environment constraints).</i></p> <p>The RSES has developed suites of Guiding Principles with key environmental considerations at the forefront to improve and protect ecological connectivity (Guiding Principles in the preparation of Green</p>

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ Tourism Assets: <ul style="list-style-type: none"> <li>○ Visitor Experience Development Plans will require AA.</li> <li>○ Visitor Experience Development Plans will specifically include a clear plan to avoid adverse effects on the integrity of European sites within the zone of influence of the plan including specific consideration of how supporting infrastructure like car parks and shops can influence the level of pressure on habitats and species the immediate vicinity.</li> <li>○ EMRA will support Local Authorities in the developing specific monitoring protocols for visitor pressure to ensure that tourism activities are maintained within sustainable limits for the European sites in the region.</li> </ul> </li> <li>▪ Skills and Talent: It is recommended that RAPJs, LEOs and Local Authorities are supported by the Regional Assemblies in upskilling on compliance with AA obligations through the planning hierarchy.</li> <li>▪ Technology and Innovation: Robust feasibility and site selection, which includes explicit consideration of likely significant effects on European sites and where relevant potential for adverse effects on the integrity of a European site will be carried out in advance of any site development.</li> </ul>	<p>Infrastructure Strategies, Guiding Principles in the consideration of development on peatland areas).</p> <p><b>RPO 3.7</b> states: <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i></p> <p>The RSES explicitly states that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network (Chapter 3 Growth Strategy - Assessment of Possible Impacts – Environmental Assessment).</p> <p>The narrative states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect. This statement is accompanied by <b>RPO 3.4 and 3.5</b> detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate. <b>RPO 3.5</b> states that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>With regards to RAPJs, LEOs and Local Authorities upskilling on compliance with AA obligations, it is not considered that upskilling on necessary statutory legislative requirements is a matter to be added to the Guiding Principles for Enterprise development.</p>
<b>Environment</b>	<ul style="list-style-type: none"> <li>▪ Land and marine plans are subject to AA when prepared. This will ensure avoidance of adverse effects on the integrity of European Sites in the first instance and mitigation measures if required.</li> <li>▪ Any plans relating to the development of wastewater facilities are subject to AA when prepared. This will ensure avoidance of adverse effects on the integrity of European Sites in the first instance and mitigation measures if required.</li> </ul>	<p>In relation to visitor pressure, <b>RPO 6.18</b> states: <i>Support the preparation and implementation of Local Authority Tourism Strategies and Diaspora Strategies. All tourism strategies and plans should include clear monitoring protocols to monitor the ongoing effect of tourism on sensitive features with particular focus on natural and built heritage assets.</i></p>

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ Any plans such as those relating to local flooding solutions are subject to AA when prepared. This will ensure avoidance of adverse effects on the integrity of European Sites in the first instance and mitigation measures if required.</li> <li>▪ Biodiversity and Natural Heritage: Any plans for developments within European sites must be cognisant of the implications of increased visitor pressure upon QI/SCIs within the site.</li> <li>▪ Any plans are subject to AA when prepared. This will ensure avoidance of adverse effects on the integrity of European Sites in the first instance and mitigation measures if required.</li> <li>▪ Green and Blue Infrastructure: Any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</li> <li>▪ Any future development of greenways, blueways, peatways, cycleways or walkways will include an assessment of any impacts that may arise from increased visitor pressures, in particular, on sensitive European sites and the design of the network will consider the provision of protective measures on sites sensitive to disturbance/visitor pressure.</li> <li>▪ In order to implement sustainable farming practices and prevent adverse effects on European sites the RSES must align with other plans and directives such as the River Basin Management Plans, Water Framework Directive, Nitrates Directive, Nitrates Action Plan, National Biodiversity Action Plans, Climate Mitigation and Adaptation Plans, Flood Risk Management Plans and any other related plans.</li> <li>▪ Landscape: Any plans are subject to AA when prepared. This will ensure avoidance of adverse effects on the integrity of European Sites in the first instance and mitigation measures if required.</li> <li>▪ Climate Change: Any plans are subject to AA when prepared prior to adoption. This will ensure avoidance of adverse effects on the integrity of European Sites in the first instance and mitigation measures if required.</li> </ul>	<p>In terms of alignment with other plans and directives, the RSES and its 16 Regional Strategic Outcomes has been aligned with International EU and national policy and which in turn sets the framework for City and County Development Plans.</p> <p>The RSES has developed suites of Guiding Principles with key environmental considerations at the forefront to improve and protect ecological connectivity (Guiding Principles in the preparation of Green Infrastructure Strategies, Guiding Principles in the consideration of development on peatland areas).</p> <p><b>RPO 7.12, 7.13, 7.14 and 7.15</b> deal specifically with the requirements around Flood Risk to ensure compliance with national guidelines and in respect of managing and reducing flood risk and the protection of environmentally sensitive sites and habitats.</p>
<b>Connectivity</b>	<ul style="list-style-type: none"> <li>▪ The guiding principles for integration of transport planning and land use planning should explicitly reference the protection of the Natura 2000 networks and the ecological linkages which support it.</li> <li>▪ AA of local transport plans will be required.</li> <li>▪ Applicable to Rail, Bus, Road and park &amp; Ride Infrastructure: As per the RPO, support for these projects is subject to <i>the outcome of appropriate environmental assessment and the planning process</i>. Furthermore as per commitments in Chapter 3 of the draft RSES Detailed and robust route and site selection will be required to inform decision making in relation to each of the projects listed.</li> <li>▪ As per the infrastructure priorities listed elsewhere, support for investment in international gateways should be clearly linked to <i>the outcome of appropriate environmental assessment and the planning process</i>. Furthermore as per</li> </ul>	<p>The protection of the Natura 2000 network and the ecological linkages that support it have been given due consideration in the RSES document through relevant RPO, supporting narrative and guiding principles. In particular, Environmental Assessment (<b>RPO 3.4 and 3.5</b>), Settlement Strategy (<b>RPO 4.2</b>), Sustainable Growth (<b>RPO 3.7</b>), Biodiversity and Natural Heritage (<b>RPO 7.16, 7.17</b>) and Ecosystem Services (<b>RPO 7.21</b>).</p> <p>New guiding principle added under Integration of Land Use and Transport as follows: <i>Ensure the protection of Natura 2000 networks and associated ecological linkages. Plans and projects that have the potential to</i></p>

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
	<p>commitments in Chapter 3 of the draft RSES detailed and robust route and site selection will be required to inform decision making in relation to such projects.</p> <ul style="list-style-type: none"> <li>▪ A specific development plan for this Dublin-Belfast corridor should be prepared in consultation with NI authorities. This should in turn be subject to AA once clear objectives and proposals are known.</li> <li>▪ A <i>feasibility</i> study into the impact of high speed rail on the European sites along the corridor with particular attention to bird populations, between Belfast-Dublin-Cork will be required to inform decision making in relation to such a proposal.</li> <li>▪ As per commitments in Chapter 3 of the draft RSES detailed and robust route and site selection will be required to inform decision making in relation to the walking and cycling infrastructure referenced with a view to identifying and subsequently avoiding high sensitivity feeding or nesting points for birds and other sensitive fauna.</li> <li>▪ The mitigation measures provided for in the NIS for the National Cycle Plan and the GDA Cycle Network should be fully applied.</li> <li>▪ The National Cycle Plan should undergo AA to align with the decision making applied to the GDA Cycle Network Strategy.</li> <li>▪ EMRA should seek to support an appraisal of the existing drainage systems in operation at Dublin Airport to ensure it is capturing pollutants to avoid downstream impacts on water quality which provides a direct link to European sites. An analysis of the drainage system for capacity to take increased air traffic movements associated with secondary hubbing proposals is also required to inform future planning.</li> <li>▪ EMRA should seek to support a dedicated study into the impact of aircraft movements at Dublin Airport on European sites on landing and take-off flight paths to and from the airport to inform future project proposals and planning for strategic infrastructure at the airport.</li> <li>▪ The mitigation measures provided for in the NIS for the National Broadband Plan should be fully applied.</li> </ul>	<p><i>negatively impact on Natura 2000 sites should be subject to the requirement of the Habitats Directive.</i></p> <p><b>RPO 7.16</b> states: <i>Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</i></p> <p><b>RPO 7.17</b> states: <i>Facilitate cross boundary co-ordination between Local Authorities and the relevant agencies in the Region to provide clear governance arrangements and coordination mechanisms to support the development of ecological networks and enhanced connectivity between protected sites whilst also addressing the need for management of alien invasive species and the conservation of native species.</i></p> <p><b>RPO 4.2</b> provides that: <i>Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</i></p> <p><b>RPO 3.7</b> states that: <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i> <b>RPO 7.21</b> states that: <i>Local authorities shall promote an</i></p>

Ref.	Proposed Mitigation Measures / Recommendations	How has this been addressed in the RSES?
		<p>Ecosystem Services Approach<sup>1</sup> in the preparation of statutory land use plans.</p> <p>In addition the RSES explicitly states that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network (See Chapter 3 Growth Strategy - Assessment of Possible Impacts – Environmental Assessment). The narrative explicitly states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect. This statement is accompanied by <b>RPO 3.4 and 3.5</b> detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>With regards to Dublin Airport, any expansion of activities as part of plans or projects will be subject to individual environmental assessment and would be the appropriate opportunity to undertake more focused assessments and inform decision making at the project level.</p> <p>All plans are subject to AA when prepared. This will ensure avoidance of adverse effects in the first instance and mitigation measures if required. Any mitigation measures arising from the AA of these plans must be carried through to project stage. A stipulation within the RSES stating compliance with these mitigation measures is not required to be reiterated in this strategic document.</p>
<b>Quality of Life</b>	<i>None required.</i>	N/A

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<sup>1</sup> See Appendix G Glossary for definition and sources

## 2 SEA MITIGATION MEASURES

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
<b>General</b>	<p>It is recommended that the following text is included in the RSES:</p> <p><i>The Regional Spatial and Economic Strategy is a tier within a planning framework which is guided by the NPF and will be supported by further robust tiering of county and local level plans within an overall hierarchy. As detail is developed down through the hierarchy, further opportunity for focused assessment will be required to inform decision making at a level of greater granularity. It is therefore important that where other strategies and plans undergo review or changes to reflect the national and regional policy objectives and outcomes of both the National Planning Framework, and subsequently the RSES, they should also consider any relevant environmental requirements.</i></p> <p><i>Feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically, the Natura 2000 Network. Furthermore, feasibility studies will be supported by robust site / route selection processes which consider a full range of alternative modes and technologies.</i></p> <p><i>At the project level, all applications for development consents for projects emanating from any policies that may give rise to likely significant effects on the environment will need to be accompanied by one or more of the following, as relevant:</i></p> <ul style="list-style-type: none"> <li>▪ <i>An Ecological Impact Assessment Report (EclA);</i></li> <li>▪ <i>Environmental Report (ER);</i></li> <li>▪ <i>An Environmental Impact Assessment Report (EIAR) if deemed necessary under the relevant legislation (statutory document);</i></li> <li>▪ <i>Natura Impact Statement if deemed necessary (NIS) under the relevant legislation (statutory document).</i></li> </ul>	<p>This text has been included in Chapter 3 Growth Strategy under Assessment of Possible Impacts – Environmental Assessment.</p>
<b>General</b>	<p>It is recommended that the following text is included in the RSES:</p> <p><i>Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</i></p>	<p>This is stated in <b>RPO 3.4</b> and further includes: <i>In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.</i></p>
<b>Vision</b>	<ul style="list-style-type: none"> <li>▪ The 3 key principles should be expanded to include a specific environmental principle to better align outcomes with overall sustainability.</li> <li>▪ The Healthy Place Making Principle should be expanded to include reference to “...and through protection of the environment they interact with.”</li> <li>▪ The Climate Action Principle should be reworded to “<i>The need to enhance climate resilience and to accelerate a transition to a low carbon economy recognising the role of natural capital and ecosystem services in achieving this.</i>”</li> </ul>	<p>The 3 key cross cutting principles set out in the RSES reflect the three pillars of sustainability: social, environmental and economic. These have informed a set of 16 Regional Strategic Outcomes (RSO) which are closely aligned and supportive with the National Strategic Outcomes (NSO) of the National Planning Framework and the UN Strategic Development Goals. These have also been developed in iteration with the Strategic Environmental Outcomes of the SEA process.</p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ The Economic Opportunity Principle should be expanded to include reference to “...and makes the best use of the resources available, while ensuring their use for future generations.”</li> <li>▪ <b>RSO 7:</b> Make reference to the Water Framework Directive and the RBMP.</li> <li>▪ Include a new RSO for protection of the marine environment and resources.</li> <li>▪ Include a new RSO for the protection of Natura 2000 sites in the region and broaden the biodiversity outcome in RSO 11 to include wider biodiversity.</li> <li>▪ Include a new RSO for the protection of the region’s built and cultural heritage.</li> </ul>	<p><b>RSO 1</b> relates to sustainable growth, <b>RSOs 8 and 9</b> addresses our transition to a low carbon and climate resilient society and <b>RSO 7</b> relates to the sustainable management of water, waste and other environmental resources and to realise the benefits of the circular economy. <b>RSO 11</b> commits to promoting coordinated spatial planning to conserve and enhance the biodiversity of protected habitats and species including landscape and heritage protection.</p> <p>It should not be necessary to list individual legislative requirements or certain aspects of the natural and built environment as part of these high level objectives which are already aligned with the National Strategic Outcomes of the NPF.</p>
<b>Growth Strategy</b>	<ul style="list-style-type: none"> <li>▪ Proposals for brownfield and infill development should be accompanied by a site risk assessment and a clear waste plan for any wastes arising, including consideration of hazardous or contaminated material and spread of invasive species.</li> <li>▪ Commitment to undertake a feasibility study to identify suitable locations in the region to develop synergies with industry for district heating.</li> <li>▪ Develop an energy map for the region highlighting renewable energy opportunities</li> <li>▪ Interim measures for water and wastewater capacity should be considered to allow for any potential delays in planning for the Greater Dublin Drainage Project and / or the Eastern Midlands Water Supply Project, as two key Dublin Metropolitan Area enablers.</li> <li>▪ Benefit of aligning energy requirements with regional climate considerations both in terms of how they could influence or be influenced e.g. suitable locations in the region to develop synergies with industry for district heating.</li> <li>▪ A robust route selection is required to inform the advancement of the strategic green network in the region, which addresses avoidance of significant effects and/ or adverse impacts on the integrity of the Natura 2000 network.</li> <li>▪ The feasibility of expansion of Dublin Port into the harbour should be clarified in the context of the Dublin Port Masterplan 2018 review.</li> <li>▪ Identification of suitable sites for regeneration and development should be supported by a quality site selection process that addresses environmental sensitivities and capacities.</li> <li>▪ A policy which introduces a distance based metric or similar to inform maximum distance from settlements would contribute to the shift in planning policy needed to support the move away from one off housing.</li> <li>▪ Sustainable growth, particularly in the outer region requires settlements to align with strategic transport corridors. Settlements with public transport and active transport options should be prioritized to achieve greatest benefit.</li> </ul>	<p>Guiding Principles for Urban Infill and Brownfield Regeneration have been included.</p> <p><b>RPO 3.5</b> states: <i>Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</i></p> <p>The narrative associated with ‘Environmental Assessment’ sets out that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically, the Natura 2000 Network. Furthermore, feasibility studies will be supported by robust site / route selection processes which consider a full range of alternative modes and technologies.</p> <p>As part of <b>RPO 7.38</b> a feasibility assessment for district heating in Local Authority areas shall be carried out and statutory planning documents shall identify local waste heat sources.</p> <p><b>RPO 7.35</b> states: <i>EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy should be developed to support delivery of projects within the Strategic Energy Zones.</i></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ Feasibility studies and robust site selection is required to support the proposed growth/intensification along the eastern seaboard and its suite of European sites.</li> <li>▪ <b>Dublin Enablers:</b> Key text on capacity and sustainability should be re-included.</li> </ul>	<p>It is anticipated that there will be mapping associated with the delivery of this objective.</p> <p>In terms of water and waste water capacity the RSES states that Irish Water will need to consider contingency plans to address any potential delays in the delivery of projects to ensure resilience of water supply and waste water treatment for the region.</p> <p><b>RPO 10.3:</b> <i>The Regional Assembly and Local Authorities shall liaise and cooperate with Irish Water to ensure the delivery of Irish Water's Investments and other relevant investment works programme of Irish Water that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and Local Authority Core Strategies, and provide for long term solutions for waste water treatment for the Region.</i></p> <p>New <b>RPO 10.5:</b> <i>Work closely with Irish Water to revise the Draft Investment Plan (2020- 2024) and subsequent investment plans to align the supply of water services with the settlement strategy and objectives of the EMRA Regional Spatial and Economic Strategy.</i></p> <p>In terms of Dublin Port, any proposed expansion would be subject to a feasibility study and in particular: <b>RPO 8.24</b> states: <i>EMRA supports the undertaking of feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPAs and SACs.</i></p> <p>The RPOs relating to single houses in the countryside have been aligned with the policy objectives of the NPF.</p> <p>In terms of sustainable growth in the outer (Gateway) region, Guiding Principles for Local Authorities in developing their core strategies provide for: <i>To enhance regional accessibility and enable the development of key towns on the strategic and public transport corridors. To promote the best use of existing and planned transport infrastructure and to promote sustainable and active modes of travel.</i></p> <p>Dublin Enablers and reference to omission of 'capacity' and 'sustainability' – high level objective <b>RPO 4.2</b> states: <i>Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for</i></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
		<p>services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p> <p><b>RPO 3.7:</b> Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</p>
<b>People &amp; Places</b>	<p>Settlement typology should include consideration of environment profile with particular reference to wastewater capacity in preparing core strategies.</p> <p>RPOs should highlight the importance of carrying capacity when facilitating urban growth and regeneration. It is also proposed that the support for the developments listed are subject to appropriate environmental assessment outcomes, proposed alteration of sentence: <i>'The UAP shall, subject to the outcome of appropriate environmental assessment and the planning process:</i></p> <p>Include a phased development plan to ensure that carrying capacity of the receiving environment is not compromised.</p> <p><b>Growth Towns:</b> General proposed mitigation measures remain relevant.</p>	<p>Growth, wastewater capacity and carrying capacity are considered to be covered by <b>RPO 4.2</b> as above.</p> <p>Expanded Guiding Principles for Urban Infill and Brownfield Regeneration deal with capacity and related constraints.</p> <p><b>RPO 4.1</b> states: <i>In preparing Core Strategies for development plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core Strategies shall also be developed having regard to the infill/brownfield targets set out in National Planning Framework National Policy Objectives 3a-3c.</i></p>
<b>People &amp; Places - Regional Growth Centres</b>	<p><b>General:</b></p> <ul style="list-style-type: none"> <li>▪ As the majority of the settlements and the associated populations occur within relative proximity of one or more European sites, the joint area action plans should explicitly consider potential for impact pathways in relation to European sites and the potential for ex-situ impacts.</li> <li>▪ Selection of sites for regeneration and expansion should be supported by a quality site selection process and subject to detailed environmental assessment which is more appropriately addressed at the county level.</li> <li>▪ The expansion of or relocation of activities associated with ports and marinas such as identified for Drogheda and Dundalk will require a feasibility study to be undertaken in the first instance and recognition that in the absence of coastal zone management, there is potential negative impacts to European sites.</li> </ul>	<p>The making of each Urban Area Action Plan will be subject to the relevant environmental assessment requirements including AA, SEA and FRA.</p> <p><b>RPO 3.5</b> has been expanded to include that the <i>future strategic development of settlements throughout the region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.</i></p> <p><b>RPO 3.5</b> which states that <i>identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</i></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ While the Drogheda and Dundalk wastewater treatment plants are operating within their design capacity and considered to have sufficient headroom, both plants are listed as Priority Urban Areas and are failing more stringent treatment standards. As such, population growth needs to be phased alongside improvements to wastewater treatment.</li> </ul>	<p>The narrative associated with 'Environmental Assessment' sets out that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically, the Natura 2000 Network. Furthermore, feasibility studies will be supported by robust site/ route selection processes which consider a full range of alternative modes and technologies.</p> <p><b>RPO 4.2</b> states: <i>Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</i></p> <p>In terms of water and waste water capacity RSES states that Irish Water will need to consider contingency plans to address any potential delays in the delivery of projects to ensure resilience of water supply and waste water treatment for the region; <b>RPO 10.3</b> states: <i>The Regional Assembly and Local Authorities shall liaise and cooperate with Irish Water to ensure the delivery of Irish Water's Investments and other relevant investment works programme of Irish Water that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and Local Authority Core Strategies, and provide for long term solutions for waste water treatment for the Region.</i></p> <p><b>RPO 8.24:</b> <i>EMRA supports the undertaking of feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPAs and SACs.</i></p> <p><b>RPO 3.7:</b> <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i></p> <p><b>RPO 7.3</b> states: <i>EMRA will support the use of Integrated Coastal Zone Management (ICZM) to enable collaborative and stakeholder</i></p>

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		engagement approaches to the management and protection of coastal resources against coastal erosion, flooding and other threats.
<b>People &amp; Places - Key Growth Towns</b>	<p><b>Navan:</b> Amend policy “Support the extension of the Boyne Greenway...” to include ... “<i>subject to the outcome of the planning process and environmental assessments.</i>”</p> <p>The primary emission point for the Navan wastewater treatment plant is noted to discharge to a section of the River Boyne which is at Moderate WFD status and At Risk of not meeting WFD objectives, and is also a designated Nutrient Sensitive River as a result of the wastewater outfall. Increasing population growth should be planned on a phased basis in collaboration with Irish Water and the local authority to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality.</p> <p><b>Naas &amp; Newbridge:</b> Population growth targets within the catchment areas being served by the Upper Liffey Valley Sewerage Scheme/Oberstown Wastewater Plant, which includes Naas and Newbridge as well as other towns, should have regard to the status and progress of the planned upgrades to the plant and other network elements, which will be subject to the outcomes of the planning process, to ensure the protection of the environment and water quality.</p> <p><b>Wicklow-Rathnew:</b> Reword objective to state: “Undertake a study on the feasibility of enhancement and expansion of Wicklow port and harbour, to expand commercial berthing and pleasure craft capacity, with particular focus on avoiding adverse impacts on the integrity of adjacent European Sites.”</p> <p><b>Mullingar:</b> Mullingar treatment is noted to be operating well within capacity however the plant is having an impact on the receiving water environment. Increasing population growth should be planned on a phased basis in collaboration with Irish Water and the local authority to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality.</p> <p><b>Tullamore:</b> the primary emission point for the Tullamore wastewater treatment plant is noted to discharge to a section of the River Tullamore which is at Poor WFD status and At Risk of not meeting WFD objectives, and is also a designated Nutrient Sensitive River as a result of the wastewater outfall. Increasing population growth should be planned on a phased basis in collaboration with Irish Water and the local authority to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality.</p> <p><b>Portlaoise:</b> Selection of sites for regeneration and expansion should be supported by a quality site selection process and subject to detailed environmental assessment which is more appropriately addressed at the county level.</p>	<p>Regarding support of extension to Boyne Greenway, <b>RPO 4.45</b> amended to include “<i>subject to the outcome of the planning process and environmental assessments.</i>”</p> <p>In terms of capacity of services, <b>RPO 4.2</b> states: <i>Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</i></p> <p>In terms of water and waste water capacity RSES states that Irish Water will need to consider contingency plans to address any potential delays in the delivery of projects to ensure resilience of water supply and waste water treatment for the region. <b>RPO 3.7:</b> <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i></p> <p>Wording of <b>RPO 4.56</b> Wicklow-Rathnew amended to include: “<i>subject to a feasibility study with particular focus on avoiding adverse impacts on the integrity of adjacent European sites.</i>”</p> <p><b>RPO 10.3:</b> <i>The Regional Assembly and Local Authorities shall liaise and cooperate with Irish Water to ensure the delivery of Irish Water’s Investments and other relevant investment works programme of Irish Water that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and Local Authority Core Strategies, and provide for long term solutions for waste water treatment for the Region.</i></p>

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	<p>The primary emission point for the Portlaoise wastewater treatment plant is noted to discharge to a section of the River Triogue which is at Poor WFD status and At Risk of not meeting WFD objectives; the downstream section of river is also a designated Nutrient Sensitive River as a result of the wastewater outfall. Increasing population growth should therefore be planned on a phased basis in collaboration with Irish Water and the local authority to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality.</p> <p><b>Carlow:</b> The primary emission point for the Carlow wastewater treatment plant is noted to discharge to a section of the River Barrow which is at Moderate WFD status and At Risk of not meeting WFD objectives; the River Barrow to the north and south of the town is also a designated Nutrient Sensitive River between the Portarlinton wastewater outfall to the north as far as Graiguenamanagh to the south. Increasing population growth should therefore be planned on a phased basis in collaboration with Irish Water and the local authorities to ensure that the assimilative capacity of the receiving environment is not exceeded and that increased wastewater discharges from population growth does not contribute to degradation of water quality</p>	<p>Expanded Guiding Principles for Urban Infill and Brownfield Regeneration deal with capacity and related constraints.</p>
<p><b>People &amp; Places – Rural Areas</b></p>	<p>EMRA will provide guidance to planning authorities on how the criterion of ‘economic need’ should be applied when deciding upon the provision of single housing.</p> <p>The policy on one-off housing should be reworded as follows: <i>“In rural areas outside the Rural Areas Under Strong Urban Influence Local Authorities shall encourage sustainable growth in areas that have experienced decline or stagnation, facilitate the provision of single houses in the countryside based on siting and design criteria for rural housing in statutory guidelines and plans, having regard to the viability of smaller towns and rural settlements, subject to the demonstrated social and economic need to provide for such, and subject to the outcomes of the Housing Need Demand Assessment.”</i></p>	<p>The need for single housing in the countryside will be projected through the local authority’s overall Housing Need Demand Assessment (HNDA) tool and county development plan core strategy processes (NPO 20).</p> <p><b>RPO 9.5</b> states: <i>Support Local Authorities, either individually or combined, in the provision of a Housing Need Demand Assessment that will inform housing policy that provides for diverse housing demand and is in accordance with statutory guidelines.</i></p>
<p><b>Dublin MASP</b></p>	<p><b>MASP General:</b> It is the recommendation that the MASP is developed into a standalone plan which can address the wider planning and environmental issues associated with the Dublin Metropolitan Area and this will be subject to detailed SEA, AA process and FRA processes.</p> <p><b>Transport General:</b> A policy should be included committing to robust route / site selection to support the delivery of transport infrastructure.</p> <p><b>Integrated Land Use and Transport:</b> The policy should be reworded to state: <i>That future development is planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use in the Metropolitan area.</i></p> <p><b>Housing General:</b></p> <ul style="list-style-type: none"> <li>▪ A new objective which acknowledges recent DHPLG draft guidelines on building height should be included.</li> </ul>	<p>Chapter 5 of the RSES is dedicated to the Dublin Metropolitan Area Plan (MASP). The NPF sets out that Metropolitan Area Strategic Plans be prepared in tandem with and as part of the relevant Regional Spatial and Economic Strategies (NPO 67). There is no national policy requirement that the MASP be developed into a standalone plan.</p> <p>Regarding the wording of ILT4, <b>RPO 5.3</b> states: <i>Future development in the Dublin Metropolitan area shall be planned and designed in a manner that facilitates sustainable travel patterns, with a particular focus on increasing the share of active modes (walking and cycling) and public transport use and creating a safe attractive street environment for pedestrians and cyclists.</i></p> <p><i>In addition, Guiding Principles for the sustainable development of the Dublin Metropolitan Area include compact sustainable growth, integrated transport and landuse, and metropolitan scale amenities.</i></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ Design standards for new apartment developments should encourage a wider demographic profile which actively includes families and aging population.</li> <li>▪ Identification of suitable residential development sites should be supported by a quality site selection process that addresses environmental concerns.</li> <li>▪ All residential developments should be phased so as to ensure adequate capacity for services (e.g. water supply, wastewater, broadband) is available to match projected demand for services.</li> <li>▪ Local Authorities should Liaise with the Regional Waste Management Office when considering applications for development of brownfield sites that require the offsite disposal of contaminated waste.</li> </ul> <p><b>Employment General:</b></p> <ul style="list-style-type: none"> <li>▪ Identification of suitable employment lands should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</li> <li>▪ Development of employment lands should be phased so as to ensure adequate capacity for services (e.g. water supply, wastewater, broadband) is available to match projected demand for services.</li> </ul> <p><b>Enabler:</b> Any development at either Dublin Airport or Dublin Port should be accompanied by an SEA/EIA, EclA and AA as appropriate.</p> <p><b>Enabler:</b> Opportunities for biodiversity enhancement to improve ecological connectivity should be explored as part of re-intensification of strategic employment areas within the M50.</p> <p><b>Infrastructure General:</b> The objectives could be strengthened by provision of specific action to ensure any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</p> <p><b>GI General:</b></p> <ul style="list-style-type: none"> <li>▪ The objectives could be strengthened by provision of specific actions to ensure any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</li> <li>▪ Any future development of the proposed cycle routes will include an assessment of any impacts that may arise from increased visitor pressures, in particular, on sensitive Natura 2000 habitats and the design of the network will consider the provision of protective measures on sites sensitive to disturbance/visitor pressure e.g. provision of physical barriers, hedgerows, any natural barriers or simply by not facilitating access onto the sensitive habitat in line with Greater Dublin Area Cycle Network Plan SEA and AA mitigations.</li> </ul>	<p>For Housing General – <b>RPO 5.4</b> references the Building Heights Guidelines. <b>RPO 9.4</b> references a wider demographic profile which actively includes families and aging population.</p> <p>For Employment General, Infrastructure General, GI General, Strategic Corridors General – are considered to be covered by <b>RPOs 3.4</b> and <b>3.5</b> and related RPOs. <b>RPO 3.5</b> references site selection. <b>RPO 4.2</b> covers phasing and the alignment of infrastructure investment and priorities with the spatial planning strategy of the RSES.</p> <p>For Transport General, the narrative associated with ‘Environmental Assessment’ sets out that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically, the Natura 2000 Network. Furthermore, feasibility studies will be supported by robust site / route selection processes which consider a full range of alternative modes and technologies.</p> <p>Guiding principles for urban infill and brownfield regeneration reference Local Authorities include a requirement to liaise with Regional Waste Management Office.</p> <p>Targeted and appropriate evaluation and analysis will be undertaken at initially CDP level and ultimately at project stage, supported where necessary with site-specific or project-specific surveys or studies. Project level environmental assessments to be carried out for example on any development at Dublin Airport or Dublin Port.</p> <p>In reference to Strategic Corridors, and references to site/ route selection references addressing environmental considerations in <b>RPOs 5.2, 5.3</b> and <b>5.7</b>, <b>RPO 3.7</b> references environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, and that Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints, including the capacity of services, to serve any new development. <b>RPO 5.5</b> also states: <i>Future residential development supporting the right housing and tenure mix within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES.</i></p>

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	<p><b>Strategic Corridors General:</b> The objective could be strengthened by provision of specific actions to ensure any development (housing or infrastructure) is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</p> <p><b>RPO 5.1:</b> It is recommended that the mention of providing infrastructural collaborations in tandem with housing and employment growth is reinstated within the RPO with respect to the appropriate environmental and planning considerations.</p> <p><b>RPO 5.2, 5.3:</b> It is advised that the RPO could be strengthened by provision of specific action to ensure any development is supported by a quality site/route selection process.</p> <p><b>RPO 5.6:</b> Encourage exploration of biodiversity improvements as part of infrastructural developments.</p> <p><b>RPO 5.7:</b> Previous proposed mitigation measures remain relevant at site/route selection phases, to identify actions that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</p>	<p><i>Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.</i></p> <p>Regarding biodiversity enhancement, Guiding Principles for Core Strategies in development plans Local Authorities to explore opportunities for biodiversity enhancement to improve ecological connectivity as part of the strategic re-intensification of urban infill and brownfield sites. <b>RPO 7.15</b> also states: <i>Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.</i></p> <p>Re GI General, <b>RPO 5.8</b> states: <i>Support the promotion and development of greenway infrastructure and facilities in the Dublin metropolitan area and to support the expansion and connections between key strategic cycle routes and greenways as set out in the NTA Greater Dublin Area Cycle Network Plan.</i></p> <p>RPOs supported by Guiding Principles for the MASP include: Alignment of growth with enabling infrastructure – to promote quality infrastructure provision and capacity improvement, in tandem with new development and aligned with national projects and improvements in water and waste water, sustainable energy, waste management and resource efficiency.</p>
<p><b>Employment and Economy</b></p>	<ul style="list-style-type: none"> <li>▪ Require services such as water, wastewater and transport to be delivered on a phased basis to match projected demand arising from new developments.</li> <li>▪ As many existing urban areas already located in close proximity to European Sites and as such the carrying capacity of SACs/SPAs will need to be established to understand what limits should be set for the extent of development.</li> <li>▪ Consideration/analysis of rail haulage rather than long distance commercial haulage along the Dublin Belfast economic corridor.</li> <li>▪ General: The policy objective could be strengthened by provision of specific actions to ensure any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum and the availability and capacity of services to serve any new industry.</li> <li>▪ Suggest a slight rewording of policy: <i>“Leverage on the EU’s Common Agricultural Policy to improve agricultural productivity, ensure Farmer’s a reasonable living,</i></li> </ul>	<p>Regarding the Employment and Infrastructure RPO mitigations - <b>RPO 3.5</b> references site selection and <b>RPO 4.2</b> references phasing of infrastructure delivery, also accounting for environmental considerations.</p> <p><b>RPO 3.4:</b> ensures that <i>all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate. In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.</i></p> <p>The narrative associated with ‘Environmental Assessment’ sets out that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the</p>

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	<p><i>helping them to understand, adapt to and mitigate climate change, maintain rural areas and landscapes and keep rural economy alive.</i></p> <ul style="list-style-type: none"> <li>▪ Any sectoral development projects should require a quality site selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum and the availability and capacity of services to serve any new industry.</li> <li>▪ These policy objectives could be strengthened by provision of specific actions to ensure any sectoral development is balanced by improving sustainability in terms of energy, waste and water, to include district heating and water conservation.</li> <li>▪ Retail policy objective could be strengthened by including criteria to address strategic environmental protection in the retail strategy.</li> <li>▪ All tourism strategies and plans should include clear monitoring protocols to monitor the ongoing effect of tourism on sensitive features with particular focus on natural and built heritage assets.</li> <li>▪ EE17: Before any plans to increase access to the countryside are implemented, the sensitivities of the surrounding area must be established and clear actions and protections put in place to avoid impact</li> <li>▪ EE21-26: This policy objective could be strengthened by provision of specific actions to ensure any development is supported by a quality site/route selection process that addresses environmental constraints such as landscape, cultural heritage and biodiversity as a minimum and the availability and capacity of services to serve any new industry.</li> <li>▪ EE28: Include reference to economic, social and environmental risk management to address strategic environmental protection.</li> </ul> <p><b>General Mitigation:</b> The selection criteria should include an additional criterion which covers environmental considerations: <i>“... Planning should also consider quality site/route selection process that addresses environmental constraints such as landscape, cultural heritage and biodiversity as a minimum and the availability and capacity of services to serve any new industry.”</i></p> <p><b>RPO 6.1 (EE1):</b> Recommend that the guiding principles for investment prioritisation are incorporated as part of the RPO text to give clear direction, with an additional guiding principle that addresses environmental considerations, i.e.: <i>“EMRA will support the national economic agencies, Local Enterprises Offices, Regional Action Plan for Jobs implementation committees on their plans for job creation with emphasis on:</i>  <i>An enterprise base with increased productivity and more diversification –including diversification of their markets - with high levels of innovation, skills adaptability and relatively low costs of doing businesses; and</i>  <i>Maintaining full-employment with unemployment rates of each Strategic Planning Area not exceeding the State average by more than one percentage point.</i></p>	<p>wider environment, including specifically, the Natura 2000 Network. Furthermore, feasibility studies will be supported by robust site / route selection processes which consider a full range of alternative modes and technologies.</p> <p><b>RPO 3.7:</b> <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i></p> <p><b>RPO 6.7:</b> <i>Support Local Authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy, tourism and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.</i></p> <p>Regarding tourism strategies - <b>RPO 6.18:</b> <i>Support the preparation and implementation of Local Authority Tourism Strategies and Diaspora Strategies. All tourism strategies and plans should include clear monitoring protocols to monitor the ongoing effect of tourism on sensitive features with particular focus on natural and built heritage assets.</i></p> <p><b>RPO 3.7</b> references the Guiding Principles for strategic employment and investment prioritisation in placemaking for enterprise development.</p> <p>New <b>RPO 6.24</b> included: <i>Support the Departments of Agriculture, Food and the Marine, and Communications Climate Action and Environment to enhance the competitiveness of the agriculture sector with an urgent need for mitigation as well as real and effective and adaptation mechanisms for the long-term sustainability of the agri-sector.</i></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<p><i>applying the guiding principles for investment prioritisation in place-making for enterprise development presented in this draft RSES i.e.:</i></p> <ul style="list-style-type: none"> <li>▪ <i>Local Authorities, RAPJs, and LECs in their preparation of projects to bid for funds, shall give due regard to factors already identified as enablers of enterprise development<sup>10</sup>, that is availability of human capital, proximity to a third level institution, transport infrastructure; broadband infrastructure; and, a diverse local sectoral mix.</i></li> <li>▪ <i>Capacity of places needs to be considered having regard to implications of commuting on quality of life.</i></li> <li>▪ <i>Align to national strategy and approach for data centres– right location for use and energy demand.</i></li> <li>▪ <i>There is opportunity for health / wellbeing sector with new hospitals, for instance St James.</i></li> <li>▪ <i>Focus on densification of existing built urban footprint around existing public transport corridors.</i></li> <li>▪ <i>Give due regard to enhanced functioning of global services centres for instance IFSC and advanced manufacturing centres.</i></li> <li>▪ <i>Identify and prioritise locations considering capacity, analysis of assets, with a vision for the city and the Region.</i></li> <li>▪ <i>Facilitate data gathering and cross promotion through local business intelligence units in Local Authorities. EMRA may facilitate shared evidence base through a regional data system/dashboard.</i></li> <li>▪ <i>Explore a ‘second site’ strategy for MNCs in outlying locations.</i></li> <li>▪ <i>Location specific sectors can be addressed more clearly– energy, marine, greenways, blueways, and peatlands.</i></li> <li>▪ <b><i>Ensure any development or proposal is supported by a quality site/route selection process that addresses environmental constraints such as landscape, cultural heritage and biodiversity as a minimum, and the availability and capacity of services to serve any new enterprise development.</i></b></li> </ul> <p>RPO 6.7: Suggested text amendment: “... <i>identification of appropriate locations to drive regeneration of these rural towns and villages for example by the provision of serviced sites for housing and co-working/incubator space near Institutes of Technology to facilitate technological spillovers through greater connections and linkages, subject site/route selection, environmental assessments and the outcome of planning.</i>”</p> <p>RPO 6.20: It is strongly recommended to re-include the following policy point on supporting actions and bids to the Climate Action Competitive Fund: “<i>Support enterprise development agencies and LEOs on the development of industries that create and employ green technologies and take measures to accelerate the transition towards a</i></p>	<p>Climate Action Fund is presented in the narrative under Section 12.3 - Implementation.</p>

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	<i>low carbon economy and circular economy, including support for the Regional Climate Action Offices, local authorities and stakeholders on their actions and bids to the Climate Action competitive Fund for the development of green infrastructure and projects.”</i>	
<b>Environment Section</b>	<p><b>Integrated land and Marine Planning:</b></p> <p>Add “sustainable” before development (i.e. into future local sustainable development and land use plans in the region.)</p> <p>Clarify whether <i>Marine Spatial Framework Directive</i> is referring to the MSFD (Marine Strategy Framework Directive for achieving GES) 2008/56/EC, or the Directive for Establishing a Framework for Maritime Spatial Planning 2014/89/EU. Both are related but distinct, and both MSP and the MSFD and its Programme of Measures should be referenced.</p> <p>EMRA should consider establishing a working group/sub-committee or other governance structure <i>to promote the development of a cross-boundary and cross-border strategic management and stakeholder engagement framework.</i></p> <p><b>Coastal Dynamics:</b></p> <p>The statement needs to be more specific about what structures will be put in place to support an integrated approach to CZM. A clear structure for ICZM is needed for the region and demonstrated commitment to collaborate/ co-ordinate between the relevant local authorities (i.e. similar to the Waste Management Strategy) through a committee/ steering group. Also, local policy should encourage an ecosystems services approach to development, located away from coastal areas. Also, a robust feasibility study or plan is required to examine the environmental implication of coastal developments</p> <p><b>Growing the Blue Economy:</b></p> <p>Specific guidance is needed regarding planned or other construction/ development requirements at regional level to control/manage sea fishery harbours and the seafood sector. Also, such strategic regional development(s) should be subject to Appropriate Assessment.</p> <p><b>Maritime Heritage:</b></p> <p>The UNESCO 2001 Convention on the Protection of the Underwater Cultural Heritage is the foremost international legal reference for the protection of underwater cultural heritage. It creates common criteria and best practice standards for the protection of underwater cultural heritage to promote its safeguarding</p> <p>Site selection studies are required for proposed coastal walks/development, including consideration of ecological constraints mapping to prevent/limit impact on BFF and/or contributing to coastal erosion.</p> <p><b>Air Quality:</b></p> <p>Clarify the text to include: <i>“To reduce harmful emissions and achieve and maintain good air quality for all urban and rural areas in the region and to work with local authorities and the relevant agencies to support local data collection in the development of air</i></p>	<p><b>RPO 3.5</b> references undertaking site/route selection, and <b>RPO 4.2</b> references appropriate phasing of development.</p> <p>In terms of marine and coastal policies, the following are included in the RSES:</p> <p><b>RPO 7.1:</b> <i>To ensure consistency and alignment between the upcoming National Maritime Spatial Plan (due in 2021) and regional approaches to marine spatial planning and to integrate the Marine Strategy Framework Directive and Marine Spatial Planning implementation into future land use plans in the Region in recognition of the opportunity to harness Ireland’s ocean potential.</i></p> <p><b>RPO 7.2:</b> <i>To achieve and maintain ‘Good Environmental Status’ for marine waters and to ensure the sustainable use of shared marine resources in the Region, and to promote the development of a cross-boundary and cross-border strategic management and stakeholder engagement framework to protect the marine environment.</i></p> <p><b>RPO 7.3:</b> <i>EMRA will support the use of Integrated Coastal Zone Management (ICZM) to enable collaborative and stakeholder engagement approaches to the management and protection of coastal resources against coastal erosion, flooding and other threats.</i></p> <p><b>RPO 7.4:</b> <i>Statutory land use plans shall take account of the risk of coastal erosion, whereby new development should be avoided in areas at risk of coastal erosion to the greatest extent practicable.</i></p> <p><b>RPO 7.5:</b> <i>EMRA shall work with coastal stakeholders to support the sustainable development of the national Fishery Harbour Centre in Howth and the sustainable growth of the seafood sector in the Region, to ensure that marine resources are sustainably managed and that planned activities on land do not adversely affect the marine economy and environment.</i></p> <p><b>RPO 7.6:</b> <i>Local Authorities shall include in Development Plans, where relevant, policies for the protection and enhancement of ship wrecks and underwater cultural heritage and shall consult the Wreck Inventory of Ireland Database when assessing planning applications located in marine, riverine or lacustrine environments.</i></p>

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	<p><i>quality monitoring and to inform a regional air quality and greenhouse gas emissions inventory.”</i></p> <p>Strengthen the policy base by adding a commitment to reducing the carbon footprint by integrating climate action into public transport planning. This would support national targets for climate policy mitigation and adaptation objectives as well as targets for greenhouse gas emissions reductions. The integration of climate in this regional policy objective would be both directly and indirectly positive for the natural and human environment as the future physical development of EMRA needs to recognise both climate mitigation and adaptation measures. A review of the capacity of the electric charging infrastructure across EMRA is needed to ensure that proposed transition to electric vehicles (and associated reduction in emissions) is achieved. Also, there needs to be a requirement to review the land area available to accommodate growth (i.e. additional people) and development in EMRA to ensure that environmental sensitivities are incorporated within the review process.</p> <p><b>Noise Pollution:</b></p> <p>Residential noise regulations are currently inadequate for home owners and need to be addressed in light of increased consolidation of residential urban areas. A review is required that presents tangible ways to improve the current regulations.</p> <p><b>Light Pollution:</b></p> <p>Clarification is needed regards what programmes or frameworks will be put in place to control and or reduce light pollution. Local authorities should identify how they can improve their approach to street lighting, ensuring that new developments are lit appropriately and that areas of existing dark skies are protected.</p> <p><b>Integrated catchment Management:</b></p> <ul style="list-style-type: none"> <li>▪ To strengthen the wording of the policy in line with the RBMP: <i>“To support, at a regional level the implementation of WFD in achieving and maintaining at least good environmental status and no deterioration of status for all water bodies in the region and to ensure alignment between the core objectives of the Water Framework Directive, River Basin Management plans any other related plans such as County Development Plans and Local Area Plan and any other requirements of the Habitats and Birds Directives, Urban wastewater Treatment and Nitrates Directives.”</i></li> <li>▪ Climate change impacts in Ireland are expected to include more intense rainfall events as well as periods of increased drought along with a rise in sea level. These events will impact on water quality and water services through increased risk of sewer flooding, possible inundation of treatment plants and other assets; deterioration in water quality in rivers and lower dry weather river flows reducing the water available for abstraction or for diluting treated effluent. A key issue therefore will be the resilience of water services infrastructure of EMRA.</li> </ul>	<p><b>RPO 7.7</b> includes reference to greenhouse gas emissions inventory.</p> <p>Additional RPOs for climate change including <b>RPO 7.31:</b> <i>Within 1 year of carrying out a regional emissions assessment, EMRA shall compile and publish an emissions inventory and, in collaboration with the relevant Departments and agencies, agree emissions reductions targets in accordance with agreed national sectoral plans and to support an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework.</i></p> <p><b>RSO 9:</b> <i>Support the Transition to Low Carbon and Clean Energy - Pursue climate mitigation in line with global and national targets and harness the potential for a more distributed renewables-focussed energy system to support the transition to a low carbon economy by 2050 (aligning with NPF NSO 8, 9)</i></p> <p>Light Pollution <b>RPO 7.9</b> requires that local authorities shall consider measures to minimise the harmful effects of light pollution in the future provision of outdoor lighting, including improving their approach to street lighting and ensuring that new developments are lit appropriately and to ensure that environmentally sensitive areas are protected.</p> <p>In terms of the water environment and catchment managements, the following policies and guiding principles are set out in the RSES:</p> <p>Guiding Principles relating to Surface water provide that:</p> <p><i>EMRA supports the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, EMRA supports the inclusion of objectives in County Development Plans relating to the provision of mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans.</i></p> <p><b>RPO 7.10:</b> <i>Support the implementation of the Water Framework Directive in achieving and maintaining at least good environmental status for all water bodies in the Region and to ensure alignment between the core objectives of the Water Framework Directive and other relevant Directives, River Basin Management plans and Local Authority Land use Plans.</i></p> <p><b>RPO 7.11:</b> <i>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</i></p>

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	<ul style="list-style-type: none"> <li>▪ EMRA should recognise the need to deliver efficient wastewater facilities with sufficient capacity and thus contribute to improved water quality in the region.</li> </ul> <p><b>Flood Risk Assessment and Management</b></p> <ul style="list-style-type: none"> <li>▪ Ensure flood risk management informs place making by avoiding inappropriate development in areas at risk of flooding and integrate sustainable water management solutions (such as SUDS, non-porous surfacing and green roofs) to create safe places. Development plans should assess flood risk by implementing the recommendations of The Planning System and Flood Risk Assessment Guidelines for Planning Authorities (2009) and Circular PL02/2014 (August 2014)</li> <li>▪ Avoid inappropriate development in areas at risk of flooding and integrate sustainable water management solutions (such as SUDS, non-porous surfacing and green roofs) to create safe places in accordance with the Planning System and Flood Risk Assessment Guidelines for Local Authorities;</li> <li>▪ EMRA will work with local authorities, OPW and other relevant Departments and agencies to implement the recommendations of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented.</li> <li>▪ EMRA will support IW and the relevant local authorities in the region to eliminate untreated discharges from settlements in the short term, while planning strategically for long term growth in tandem with Ireland 2040.</li> <li>▪ EMRA will support the relevant local authorities [and IW where relevant] in the region to improve storm water infrastructure to improve sustainable drainage and reduce the risk of flooding in the urban environment.</li> <li>▪ EMRA will support IW and the relevant local authorities in the region to increase compliance with the requirements of the Urban WW Directive from 39% today to 90% by the end of 2021, to 99% by 2027 and to 100% by 2040.</li> <li>▪ EMRA will support IW and the relevant local authorities in the region to reduce leakage, minimising demand for capital investment.</li> <li>▪ EMRA will support the relevant local authorities in development and provision at a local level of Sustainable Urban Drainage solutions.</li> <li>▪ Ensure that environmental sensitivities are incorporated within the review process. However, water and wastewater services should be delivered on a phased basis to match projected demand. It is acknowledged that Irish Water has existing standard operating procedures which include procedures for the protection of the environment. These operating procedures include compliance with relevant legislation relating to SEA, AA, EIA as well as a wealth of other EU and national water legislation for plans and projects for which they are</li> </ul>	<p><i>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.</i></p> <p>In relation to flooding, the following four RPOs are included:</p> <p><b>RPO 7.12:</b> <i>Future statutory landuse plans shall include Strategic Flood Risk Assessment (SFRA) and seek to avoid inappropriate land use zonings and development in areas at risk of flooding and to integrate sustainable water management solutions (such as SUDS, nonporous surfacing and green roofs) to create safe places in accordance with the Planning System and Flood Risk Assessment Guidelines for Local Authorities</i></p> <p><b>RPO 7.13:</b> <i>EMRA will work with Local Authorities, the OPW and other relevant Departments and agencies to implement the recommendations of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented.</i></p> <p><b>RPO 7.14:</b> <i>Local Authorities shall take account of and incorporate into the development of local planning policy and decision making the recommendations of the Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.</i></p> <p><b>RPO 7.15:</b> <i>Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.</i></p> <p>In terms of water services and the water environment, the following RPOs are included in Chapter 10:</p> <p><b>RPO 10.1:</b> <i>Local Authorities shall include proposals in Development Plans to ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a</i></p>

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	<p>responsible. However, new infrastructure or the upgrade of existing infrastructure should be guided by the development of siting criteria.</p> <ul style="list-style-type: none"> <li>▪ Suggest adding in a policy: <i>“The RSES supports the implementation of the All-Ireland Pollinator Plan 2015 – 2020. Local Authorities should incorporate the actions of All-Ireland Pollinator Plan 2015-2020 when managing their parks, open spaces, roadside verges and all vegetation in a way that provides more opportunities for biodiversity, while being cognisant of the threat of the spread of invasive species.”</i></li> <li>▪ Re-include the sentence “... promoting cooperation between neighbouring authorities where flood risk crosses administrative boundaries.”</li> <li>▪ Suggested text amendment: <i>“EMRA will work with local authorities, OPW and other relevant Departments and agencies to implement the recommendations of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented, subject to the outcome of the planning process and required environmental assessments.”</i></li> <li>▪ It would be positive to re-include “... having regard to the CFRAMS mapping and other mapping as available.”</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>▪ Add a requirement for local level land use plans to include ecosystem services and green/blue infrastructure provisions in their land use plans. Also, they should have regard to the required conservation objectives in relation to European sites, other nature conservation sites, ecological networks, and protected species.</li> <li>▪ In terms of land access for tourism, the policies should have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.</li> <li>▪ The management and control of IAS is complex, involves a cross section of stakeholders and a potential transboundary and/or cross-border dimension. Clear governance arrangements and coordination mechanisms across the region would have potential benefits of optimal use of resources, knowledge sharing; co-ordinated implementation; consistency of approaches and communications; ability to address high risk cases which may be occurring in several local authority areas etc.</li> <li>▪ The policy on tourism strategies would be strengthened if it was expanded by adding the proposed methodology for delivery (e.g. commitment to develop guidelines on biosecurity). Also, clarification is needed regards what governance structures are likely to be put in place to promote coordination across EMRA regards surveys, prevention of IAPS of invasive species and conservation of native species. Enhanced co-operation between Public Authorities on IAS, should include those at the freshwater / marine interface</li> </ul>	<p><i>healthy society, economic development requirements and a cleaner environment.</i></p> <p><b>RPO 10.3:</b> <i>The Regional Assembly and Local Authorities shall liaise and cooperate with Irish Water to ensure the delivery of Irish Water’s Investments and other relevant investment works programme of Irish Water that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and Local Authority Core Strategies, and provide for long term solutions for waste water treatment for the Region.</i></p> <p><b>RPO 10.4:</b> <i>Support Irish Water and the relevant Local Authorities in the Region to reduce leakage, minimising demand for capital investment.</i></p> <p><b>RPO 10.5:</b> <i>Work closely with Irish Water to revise the Draft Investment Plan (2020-2024) and subsequent investment plans to align the supply of water services with the settlement strategy and objectives of the EMRA Regional Spatial and Economic Strategy.</i></p> <p><b>RPO 7.21:</b> <i>Local Authorities shall promote an Ecosystem Services Approach in the preparation of statutory land use plans.</i></p> <p>Guiding Principles for Surface Water to be incorporated into Development Plans and LAPs: <i>Take opportunities to enhance biodiversity and amenity and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned. Plans and projects that have the potential to negatively impact on Natura 2000 sites should be subject to the requirements of the Habitats Directive.</i></p> <p><b>RPO 7.15:</b> <i>Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.</i></p> <p><b>RPO 7.16:</b> <i>Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</i></p> <p><b>RPO 7.17:</b> <i>Facilitate cross boundary co-ordination between Local Authorities and the relevant agencies in the Region to provide clear governance arrangements and coordination mechanisms to support</i></p>

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	<p>(e.g. Marine Institute); community and stakeholder involvement and support is essential to ensure the long-term sustainability of IAS projects.</p> <ul style="list-style-type: none"> <li>The following objective should be included: <i>Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</i></li> </ul> <p><b>Natural Heritage</b></p> <p>It is strongly recommended to re-include the following RPO: <i>“To ensure that Local Authority Development Plans, local area land use plans and other relevant plans include provisions for ecosystem services and for the integration of peatland agricultural and forestry policy with the conservation management of all Natura 2000 sites and in line with our biodiversity and climate obligations and targets.”</i></p> <p><b>Green and Blue Infrastructure</b></p> <ul style="list-style-type: none"> <li>Suggest text alteration: <i>“To ensure that Local Authority Development Plan and Local Area Plans, shall identify, protect, enhance, provide and manage Green Blue Infrastructure (GBI) in an integrated and coherent manner in line with Guiding Principles <u>and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species.</u>”</i></li> <li>The objectives on Green/Blue infrastructure should have regard to the required conservation objectives of European sites, other nature conservation sites, ecological networks, and protected species. Also, a map of potential strategic GBI networks that considers ecological sensitivities is required to prevent habitat fragmentation and/or loss. Appropriate Assessments will be required for proposed developments in close proximity to EU protected and/or other ecologically sensitive areas (e.g. coastal areas are at risk of erosion, loss of habitat, etc. from increased usage by cycle ways, greenways, etc.)</li> <li>Suggest re-inclusion of the policy in relation to habitat mapping: <i>“To support and co-ordinate the development of habitat mapping of the region using established best practices to identify key strategic biodiversity assets in the region.” Alternatively, the new RPO on cross boundary collaboration on the development of ecological networks could include a reference to supporting and co-ordinating local authority contributions towards a comprehensive Regional Habitat Map by collating existing data and identifying data gaps which could be addressed at lower planning levels for instance.”</i></li> <li>Re-include a reference to supporting the development and implementation of local BAPs, or an inclusion of a reference to the National BAP with a requirement for local authorities to have regard to the targets set out therein.</li> <li>Suggested text amendments: <i>“Work with local authorities and state agencies to promote the sustainable development of improved visitor experiences and</i></li> </ul>	<p><i>the development of ecological networks and enhanced connectivity between protected sites whilst also addressing the need for management of alien invasive species and the conservation of native species.</i></p> <p><b>RPO 3.4</b> details the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum. In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.</p> <p>In relation to managing green infrastructure, <b>RPO 7.22</b> states: <i>Local authority Development Plan and Local Area Plans, shall identify, protect, enhance, provide and manage Green Infrastructure in an integrated and coherent manner and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species;</i> and <b>RPO 7.23</b> states: <i>Support the further development of Green Infrastructure policies and coordinate the mapping of strategic Green Infrastructure in the Region;</i> and <b>RPO 7.24</b> states: <i>Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and /or linked with local Greenways and other cycling and walking infrastructure, notwithstanding that capacity of a greenway is limited to what is ecologically sustainable.</i></p> <p>The Growth Enablers for the Region also include the following:</p> <p>11. <i>Support rural areas by harnessing natural resources to develop renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.</i></p> <p>The Guiding Principles for Green Infrastructure Strategies include:</p> <ul style="list-style-type: none"> <li>Identify and protect existing GI Assets - before development (including spatial mapping where appropriate) and enhance the potential of the existing network through the development of new GI assets during development processes.</li> </ul>

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	<p><i>facilities in the Wicklow National Park, subject to the outcome of feasibility and robust site/route selection which takes account of the carrying capacity of the areas targeted for development. Development should have regard to the required conservation objectives in relation to European sites, other nature conservation sites, ecological networks, and protected species."</i></p> <ul style="list-style-type: none"> <li>▪ Suggested text amendment: <i>"Support the consideration of designating a National Park for the peatlands area in the Midlands and support the development of a National Park Management Plan <u>which sets out clear roles, responsibilities and targets for the park, including protection of habitats and species and the handling of tourism/visitor pressures.</u>"</i></li> <li>▪ Suggested text amendments: <i>"Promote the development of improved visitor experiences, nature conservation and <u>sustainable</u> development activities within the Dublin Bay Biosphere subject to the outcome of feasibility and robust site/route selection which takes account of the carrying capacity of the areas targeted for development. Development should have regard to the required conservation objectives in relation to European sites, other nature conservation sites, ecological networks, and protected species."</i></li> <li>▪ Suggested text amendment: <i>"Local Authority Development Plan and Local Area Plans, shall identify, protect, enhance, provide and manage Green and Blue Infrastructure in an integrated and coherent manner in line with the Guiding Principles and should also have regard to the required targets in relation to the conservation of European sites, other nature conservation sites, ecological networks, and protected species."</i></li> <li>▪ Suggested text amendment: <i>"Support the further development of Green Infrastructure policies and guidance, to ensure Green Infrastructure policies and objectives are integrated into Regional Climate Adaptation Plans, and other relevant policy, and coordinate the mapping of strategic Green Infrastructure in the Region."</i></li> </ul> <p><b>Development of Greenways, Blueways and Peatways</b></p> <ul style="list-style-type: none"> <li>▪ Ensure that developments along water bodies are located a suitable distance from the water's edge.</li> <li>▪ A robust feasibility study or plan is required to examine the environmental implications of developing Blueways for the region. The development of a regional network of would support the development of rural communities and job creation in the rural economy. If carefully and strategically managed they have the potential to offer protection and promotion of natural assets and biodiversity.</li> <li>▪ A regional strategic infrastructure and services map should be developed to inform and coordinate land use developments regionally.</li> </ul>	<ul style="list-style-type: none"> <li>• Connectivity is key – interconnect GI assets with each other and with people, providing linkages from built up areas to the countryside. This includes wildlife corridors between areas of high biodiversity value and the development of greenways, blueways and peatways.</li> <li>• Consider the ecological impacts of greenways – there is a need to strategically plan, deliver and manage our GI networks and ensure appropriately designed infrastructure to reduce the impact on the natural environment.</li> <li>• Consider an ecosystem services approach - addressing biodiversity protection, water management and climate action in the planning and management of green spaces, for example provision of street trees, roadside hedges, planting wildflower meadows, introducing wildlife under- and over-passes, permeable surfaces and SUDS along connecting routes and green walls and roofs on buildings.</li> </ul> <p><b>RPO 7.25: Support Local Authorities and state agencies in the delivery of sustainable strategic greenways, blueways, and peatways projects in the Region under the Strategy for the Future Development of National and Regional Greenways.</b></p> <p>A new <b>RPO 7.26</b> is include also: <i>Support the development of guidance for assessment of proposed land zonings in order to achieve appropriate riparian setback distances that support the attainment of high ecological status for water bodies, the conservation of biodiversity and good ecosystem health, and buffer zones from flood plains.</i></p> <p>For landscape character, <b>RPO 7.27</b> states: <i>Following the adoption of a national landscape character assessment, the Assembly will prepare a Regional Landscape Character Assessment to promote better landscape management and planning in the Region.</i></p> <p>In relation to co-operation and cross boundaries Guiding Principles for Core Strategies:</p> <p><b>3. Compact sustainable growth – Promote compact, sequential and sustainable development of urban areas from large to small to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin city and suburbs and a target of at least 30% for other urban areas. Support co-ordination across Local Authorities and agencies to promote</b></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ The objectives should have regard to the required conservation objectives of European sites, other nature conservation sites, ecological networks, and protected species.</li> <li>▪ Consider undertaking a feasibility study to accompany the decision-making with regards to developing Green/ blue/ Peatways to examine the environmental implications of developing Blue/Greenways and/or Peatways in the region. There needs to be a requirement to review the land area available to accommodate growth (i.e. additional people) and development in EMRA to ensure that environmental sensitivities are incorporated within the review process. The EPA-funded Environmental Sensitivity Mapping (ESM) WebTool was used in the assessment of the NPF should be applied to inform planning decisions in terms of zoning and provision of services (e.g. RSEs, MASPs, CDPs). EMRA should investigate the potential application of the ESM tool to strategically inform the development of Greenways, Blueways and Peatways and address cumulative analysis of impacts on the environment. Development of Green/Blue/Peatways can contribute to habitat loss and/or fragmentation and reduction in biodiversity. Therefore initiatives need to be developed that puts the protection of the natural environment at the core of decision-making (e.g. ecosystems services approach).</li> <li>▪ Suggested text amendment: <i>“Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and /or linked with local Greenways and other cycling and walking infrastructure, subject to the outcomes of planning, route selection and environmental assessments.”</i></li> </ul> <p><b>Landscape Character Assessment</b></p> <ul style="list-style-type: none"> <li>▪ While it is welcomed that a Regional Landscape Character Assessment will be supported, it must be noted that a significant amount of development has occurred in the region in the absence of a National Landscape Character Assessment in the intervening years since the publication of the National Landscape Strategy. As such, greater clarity is needed on the actions needed to progress a Regional LCA and timelines established.</li> <li>▪ Suggested text amendment: <i>“Following the adoption of a national landscape character assessment, the Assembly will prepare a Regional Landscape Character Assessment to promote better landscape management, protection and planning in the Region.”</i></li> </ul>	<p><i>active land management and better use of under-utilised, brownfield and public lands.</i></p> <p><b>RPO 11.1:</b> <i>In co-operation with relevant departments in Northern Ireland, the Eastern and Midlands Regional Assembly, and where appropriate in association with the Northern and Western Regional Assembly, will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning, economic growth and related spheres.</i></p> <p>The RSES will provide an ecological resource map for the region identifying designated sites.</p> <p>The National Biodiversity Action Plan 2017 is supported in the RSES.</p> <p>In relation to the Habitats Directive, the following <b>RPO 7.16</b> sets out that the RSES will: <i>Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</i></p> <p>In relation to National Park Management and tourism pressures <b>RPO 6.18</b> recognises that <i>all tourism strategies and plans should include clear monitoring protocols to monitor the ongoing effect of tourism on sensitive features with particular focus on natural and built heritage assets.</i></p> <p>Regarding carrying capacity and feasibility studies, the RSES states that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network (See Chapter 3 Growth Strategy - Assessment of Possible Impacts – Environmental Assessment).</p> <p>The narrative also outlines that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there</p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
		<p>will be no adverse effect. This statement is accompanied by <b>RPOs 3.4 and 3.5</b> detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum. In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.</p> <p><b>RPO 3.7</b> also outlines the following: <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i></p>
<p><b>Climate Change</b></p>	<p><b>Transition to a Low Carbon, Circular &amp; Climate Resilient Region</b></p> <p>The EMRA Climate Action Regional Office will be tasked with compiling and maintaining a greenhouse gas emissions inventory for the region to allow for planning of strategic mitigation action through a Regional Decarbonisation Plan. Suggested wording as follows: <i>Within one year of the publication of the RSES, the EMRA Climate Action Regional Office will compile a greenhouse gas emissions inventory for the region to allow for planning of strategic mitigation action through a Regional Decarbonisation Plan. The Climate Action Regional Office will track the success of the Plan through annual inventories completed each year. Annual reporting of the inventories and critical analysis of the proposed measures will be undertaken to track progress within the region and to track progress with national targets on a regional basis.</i></p> <p>Any emissions reduction target set should be based on elements within the control of the RSES and to comply with national targets a 40% reduction by 2030 would be an ambitious but applicable target to employ. Suggested policy wording: <i>On publication of the first regional emission inventory, the EMRA will identify the sectoral emissions and assign a series of sectoral emissions reductions targets for each sector within the Regional Decarbonisation Plan. These emissions reductions targets will be based on an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework.</i></p>	<p>The CAROs and their duties are referenced with respect to the following RPOs:</p> <p><b>RPO 7.32:</b> <i>With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate adaptation and mitigation strategies which shall address issues including local vulnerability to climate risks and identify and prioritise actions, in accordance with the Guiding Principles of the National Adaptation Framework, National Mitigation Plan.</i></p> <p><b>RPO 7.32:</b> Climate Action Regional Offices shall provide support to the local authorities on the development, adoption and implementation of local climate action strategies (which can address both adaptation and mitigation). Ongoing support should relate to the specific actions, and obligations and timescales for same that must be undertaken by the local authorities in accordance with local climate change adaptation strategies and compliance with national policy.</p>

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	<p>It is recommended that policy is revised to account for the national adaption policy as follows: <i>Local Authorities shall develop, adopt and implement local climate action strategies which shall assess local vulnerability to climate risks, quantify the emissions produced within their jurisdictions, and identify, cost and prioritise adaptation actions in accordance with the guiding principles of the National Adaptation Framework. This mitigation has now been integrated into the draft RSES.</i></p> <p>Guidelines and support will be documented and provided to the local authorities on the development, adoption and implementation of local climate action strategies (both mitigation and adaption). These guidelines will include the specific actions and obligations and timescales for same that must be undertaken by the local authorities to comply with national policy.</p> <p>A bioeconomy feasibility study for the region should be undertaken to identify the area of the potential growth in the region to inform investment in line with the national transition objective to a low carbon climate resilient economy.</p> <p><b>Circular Bioeconomy, Waste Heat Recovery &amp; Micro-generation</b></p> <p>A bioeconomy plan for the region should be developed that outlines the capacity of the region to supply the range of bioenergy resources required for the fuel mix as well as the current and projected consumption requirements for growth in this market.</p> <p><b>Decarbonising Electricity Generation</b></p> <p>The Strategic Energy Zones for the region will be developed using the relevant spatial mapping information from national databases such as the Environmental Sensitivity Mapping or similar to ensure all environmental constraints are addressed in the analysis.</p> <p>A regional landscape strategy should be developed to support delivery of projects within the Strategic Energy Zones.</p> <p>It is strongly recommended that the previous text stating the requirement for Appropriate Assessment is re-included: <i>"The EMRA shall, in conjunction with local authorities in the region, identify Strategic Energy Zones to identify areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas with the outcome presenting regionally consistent new land-use policies and objectives and associated development management guidance to potential projects. Plans or projects that have the potential to negatively impact on Natura 2000 sites will be subject to a Habitats Directive Assessment (HDA) according to Article 6 of the Habitats Directive and in accordance with best practice and guidance. The Strategic Energy Zones for the region will be developed using the relevant spatial mapping information from national databases such as the Environmental Sensitivity Mapping or similar to <del>will</del> ensure all environmental constraints are addressed in the analysis."</i></p> <p><b>Decarbonising the Built Environment</b></p> <p>The recast of the Energy Performance of Buildings Directive (EPBD) requires that all new buildings (public and private) are Nearly Zero-Energy Buildings (NZEB) by 2020</p>	<p>Additional RPOs referencing emissions inventories are also included as follows:</p> <p>New <b>RPO 7.31</b>: <i>Within 1 year of carrying out a regional emissions assessment, EMRA shall compile and publish an emissions inventory and, in collaboration with the relevant Departments and agencies, agree emissions reductions targets in accordance with agreed national sectoral plans and to support an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework.</i></p> <p>New <b>RPO 3.6</b>: <i>City and County Development Plans shall undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress towards carbon reduction targets.</i></p> <p>In relation to the bioeconomy, <b>RPO 7.34</b> states that: <i>EMRA supports the National Policy Statement on Bioeconomy (2018) and supports the exploration of opportunities in the circular resource-efficient economy including undertaking a bio-economy feasibility study for the Region to identify the area of potential growth in the Region to inform investment in line with the national transition objective to a low carbon climate resilient economy.</i></p> <p><b>RPO 7.37</b> also states: <i>A bio-economy plan for the Region should be developed that outlines the capacity of the Region to supply the range of bioenergy resources required for the fuel mix as well as the current and projected consumption requirements for growth in this market.</i></p> <p>Strategic Energy Zones are covered under <b>RPO 7.35</b>: <i>EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy could be developed to support delivery of projects within the Strategic Energy Zones.</i></p> <p>In relation to landscape character, <b>RPO 7.27</b> states: <i>Following the adoption of a national landscape character assessment, the Assembly will prepare a Regional Landscape Character Assessment to promote better landscape management and planning in the Region.</i></p>

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	<p>(this broadly equates to a BER Rating A3). This is a critical requirement for the housing stock in particular and it is suggested that the policy is reworded to include the following: <i>Local Authorities shall include policies in Statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings. All new buildings within the region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).</i></p> <p>The National Energy Efficiency Action Plan (NEEAP) requires the public sector to show leadership on energy efficiency and a challenging target of 33% improvement in energy efficiency was applied to the public sector. For the purposes of showing ambition and leadership to the wider community, the RSES should include a revision to policy BE2 for all local authority buildings to achieve this target. Suggested wording as follows: <i>Support investments in energy efficiency of existing commercial and public building stock with a target of all public buildings and at least one-third of total commercial premises upgraded to BER Rating 'B'. Local authorities shall report annually on energy usage in all public buildings and will achieve a target of 33% improvement in energy efficiency in all buildings in line with the requirements of the National Energy Efficiency Action Plan (NEEAP).</i></p> <p><b>Electric Vehicle Transition</b></p> <p>The Regional Decarbonisation Plan needs to be cognisant of the phasing of the growth of the renewable electricity fraction both nationally and in the region to ensure that any growth on EV within the fleet maintains pace with the growth in renewables.</p> <p>Re-include the specific measures around EV infrastructure and uptake to provide clear direction for lower level planning i.e.: "Local authorities shall include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including the following measures:</p> <ul style="list-style-type: none"> <li>▪ <i>Facility for recharging of EVs to be included as part of planning applications for commercial developments where customer car parking for twenty vehicles or more is included.</i></li> <li>▪ <i>Planning applications for new dwellings with shared parking spaces to include provision for recharging of EVs;</i></li> <li>▪ <i>Reserving of spaces for the provision of recharging for electric vehicles both in town centres and also in residential areas where residents do not have access to a private parking space."</i></li> </ul>	<p><b>RPO 7.36:</b> <i>Planning policy at Local Authority Level shall reflect and adhere to the principles and planning guidance set out in Department of Housing, Planning and Local Government publications relating to 'Wind Energy Development' and the DCCAE Code of Practice for Wind Energy Development in Ireland on Guidelines for Community Engagement and any other relevant guidance which may be issued in relation to sustainable energy provisions.</i></p> <p><b>RPO 7.38:</b> <i>Local Authorities shall consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in Local Authority areas shall be carried out and statutory planning documents shall identify local waste heat sources.</i></p> <p><b>RPO 7.39:</b> <i>Local Authorities shall report annually on energy usage in all public buildings and will achieve a target of 33% improvement in energy efficiency in all buildings in line with the requirements of the National Energy Efficiency Action Plan (NEEAP).</i></p> <p><b>RPO 7.40:</b> <i>Local Authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings. All new buildings within the Region will be required to achieve the Nearly Zero Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD).</i></p> <p><b>RPO 7.41:</b> <i>Support and promote structural materials in the construction industry that have low to zero embodied energy &amp; CO<sub>2</sub> emissions.</i></p> <p>In relation to electric vehicles, the following <b>RPO 7.42</b> applies: <i>Local Authorities shall include proposals in statutory land use plans to facilitate and encourage an increase in electric vehicle use, including</i></p>

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		<i>measure for more recharging facilities and prioritisation of parking for EVs in central locations.</i>
<b>Connectivity</b>	<p><b>Guidance of Planning and Investment:</b></p> <ul style="list-style-type: none"> <li>There would be merit in outlining which behavioural change programmes/interventions will be prioritised during the RSES period e.g. there are a number such interventions listed in the GDA Transport Strategy which notes that regional-level impacts can occur if these programmes are maintained and expanded.</li> <li>A principle which also encourages a shift to alternative fuels e.g. a requirement for EV charging points could also be considered to ensure support a shift to more low carbon vehicles where they are needed. The principles also need to include a maximum walking / cycling distance for any new residential and employment development to prevent “creep” of residential housing to areas which are realistically not close enough to relevant basic public services. The language used in some of the principles e.g. “to the extent possible” provides considerable leeway for interpretation at county and local level and this is likely to dilute the overall positive benefits the principles will be in the medium to long term.</li> <li>It is strongly recommended that the guiding principle is reinstated to encourage positive outcomes.</li> </ul> <p><b>Managing EMRA’s Transport Assets:</b></p> <ul style="list-style-type: none"> <li>This policy should outline specific actions for management and enhancement, as well as the responsible authority for each i.e. EMRA, NTA etc. Furthermore the RPO should include a requirement for robust feasibility studies and site / route selection as the most effective manner to reduce impacts on the environment from such enhancements with particular attention paid to demand management and overall systems management options. An RPO which seeks to proactively engage with the key stakeholders for land transport would be a positive addition.</li> </ul> <p><b>International Gateways:</b></p> <ul style="list-style-type: none"> <li>Suggested text amendment: “The critical role of EMRA’s international gateways will be protected by ensuring that local land use policies facilitate their functions and their landside access capacity <i>subject to consideration of environmental concerns including water quality, flood risks, human health, natural and built heritage.</i>”</li> <li>Any plans to facilitate growth and port access must first ensure that it will not have any adverse effects on the integrity of the site(s).</li> <li>Provide further clarity on which aspects the gateways cover e.g. Dublin Airport, Dublin Port, Dublin-Belfast Corridor etc.</li> </ul>	<p>Regarding behavioural changes, a new <b>RPO 8.7</b> states: <i>To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.</i></p> <p><b>RPO 8.4</b> also states: <i>Land use plans within the GDA shall demonstrate a consistency with the NTA’s Transport Strategy for the Greater Dublin Area and plans with or outside of the GDA shall be consistent with the Guiding Principles expressed in the RSES.</i></p> <p>In terms of EVs, <b>RPO 7.42</b> states: <i>Local Authorities shall include proposals in statutory land use plans to facilitate and encourage an increase use of mobility management, including measure for more recharging facilities and prioritisation of parking for EVs in central locations.</i></p> <p>For alternative modes, an additional <b>RPO 9.10</b> states: <i>In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for ‘Healthy Placemaking’ and ‘Integration of Land Use and Transport’ as set out in the RSES and to national policy as set out in ‘Sustainable Residential Development in Urban Areas’ and the ‘Design Manual for Urban Roads and Streets (DMURS).</i></p> <p>The language of “to the extent possible” is removed.</p> <p>A number of Guiding Principles for transport are included in the RSES as follows:</p> <ul style="list-style-type: none"> <li><i>For urban-generated development, the development of lands within or contiguous with existing urban areas should be prioritised over development in less accessible locations. Residential development should be carried out sequentially, whereby lands which are, or will be, most accessible by walking, cycling and public transport – including infill and brownfield sites – are prioritised;</i></li> <li><i>The management of space in town and village centres should deliver a high level of priority and permeability for walking, cycling and public transport modes to create accessible, attractive, vibrant and safe, places to work, live, shop and engage in community life. Accessibility by car does need to be</i></li> </ul>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>Policy should include a consideration of all modes when facilitating landside access, not just road options.</li> </ul> <p><b>Local Transport Plans (LTPs):</b></p> <ul style="list-style-type: none"> <li>As NPF policy NPO75 requires that all plans arising from the framework will be subject to SEA and AA, policy should be amended to: "LTP's will be subject to further environmental assessment at local level as appropriate."</li> <li>Include a requirement for LTP's to have consideration of the DTTAS National Policy Framework for Alternative Fuels Infrastructure for Transport 2017-2030.</li> <li>A parallel objective which promotes the use of electric vehicles as a way to tackle connectivity and climate change should also be considered for inclusion, where LTP's also consider the distribution and capacity of charging infrastructure to encourage uptake.</li> </ul> <p><b>The role of Transport in Enabling Access for All:</b></p> <ul style="list-style-type: none"> <li>The objective could be strengthened by outlining specific actions for what it means for transport to meet the needs of an ageing population. A best practice note on how best to achieve this in county and lower level planning with international best practice examples and stakeholder engagement should be considered.</li> <li>Previous mitigation remains relevant, it is advised that this positive RPO is reinstated.</li> </ul> <p><b>Regional Ports:</b></p> <ul style="list-style-type: none"> <li>It is strongly advised that the inclusion of feasibility studies are referred to as a requirement rather than the current supportive statement.</li> </ul> <p><b>Transport RPOs General:</b></p> <ul style="list-style-type: none"> <li>All of the above cited RPOs related to transport investment priorities should be pre-faced by the following text: ...subject to appropriate environmental assessment and the outcome of the planning process.</li> <li>Cross reference key NPF policies relating to transport e.g. NPO 27, 30, 46, 64, to set the national context.</li> <li>There would be merit in referencing NPO 65 which relates to the pro-active management of noise, as EMRA has a significant proportion of the heavy rail network, national road network and Dublin Airport, which all fall under the Environmental Noise Directive and requirement to be addressed under LA Noise Action Plans.</li> <li>As part of recognising climate change adaptation and mitigation in the transport sector, the Transport Chapter should have regard to the policy measures for transport outlined in the National Climate Change Mitigation Plan and DTTAS's</li> </ul>	<p><i>provided for, but in a manner, which complements the alternative available modes. Local traffic management and the location / management of destination car parking should be carefully provided;</i></p> <ul style="list-style-type: none"> <li><i>Planning at the local level should prioritise 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;</i></li> <li><i>Where additional road capacity is provided within or around any town which has an objective to cater for traffic that currently uses the road network in central areas and their immediate environs, that this additional capacity would be used for the improvement of the public transport, walking and cycling networks within the towns through the reallocation of road space to these modes;</i></li> <li><i>Ensure the protection of Natura 2000 networks and associated ecological linkages. Plans and projects that have the potential to negatively impact on Natura 2000 sites should be subject to the requirements of the Habitats Directive;</i></li> <li><i>Support the '10 minute' settlement concept, whereby a range of community facilities and services are accessible in short walking and cycling timeframes from homes or accessible by high quality public transport to these services in larger settlements;</i></li> <li><i>New development areas, including peripheral areas, should be permeable for walking and cycling and the retrospective implementation of walking and cycling facilities should be undertaken in existing neighbourhoods, in order to a give competitive advantage to these modes. Where possible, developments shall provide for filtered permeability.</i></li> </ul> <p>With regard to LTPs, <b>RPO 8.6</b> states: <i>In order to give local expression to the regional level Transport Strategy within the Region in conjunction with the NTA, Local Transport Plans (LTP) will be prepared for selected settlements in the Region.</i></p> <p><b>RPO 3.5</b> references site selection, and <b>RPO 4.2</b> references phasing of development. <b>RPO 3.7</b> also references site/route selection and the consideration of environmental constraints for new</p>

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	<p>first adaptation plan for the transport sector, Developing Resilience to Climate Change in the Irish Transport Sector. This chapter should include a cross-reference directing readers to the relevant regional policies with respect to the transport sector within the Infrastructure and Climate Change chapter.</p> <ul style="list-style-type: none"> <li>• Include a reference to the National Policy Framework for Alternative Fuels Infrastructure for Transport as well as a commitment to promotion and supporting uptake of electric vehicles in the region.</li> <li>• Include a clear objective to prevent the spread of invasive and alien species within the region.</li> </ul> <p><b>Transport Investment Priorities:</b></p> <p><u>Rail</u></p> <ul style="list-style-type: none"> <li>• Include the following text amendment to the policy: “RPO - The RSES supports delivery of the rail projects set out in Table 8.1, subject to appropriate environmental assessment and the outcome of the planning process.</li> <li>• Would benefit from clarity on whether clarify whether this involves utilising the existing network with upgrades/increased services, looking at the feasibility of disused rail lines, or supporting the provision of new heavy rail lines.</li> <li>• As construction of the National Rail Control Centre is currently at design stage, remove reference to “Complete construction of...” to “Support delivery of...”</li> <li>• As MetroLink is currently at the Emerging Preferred Route Stage of Route Selection, remove reference to “Support construction of...” to “Support delivery of...”</li> </ul> <p><u>Bus</u></p> <ul style="list-style-type: none"> <li>• Include the following text amendment to the policy: “<i>The RSES supports delivery of the following bus projects set out in Table 8.2, subject to appropriate environmental assessment and the outcome of the planning process</i>”</li> </ul> <p><u>Strategic Road Network</u></p> <ul style="list-style-type: none"> <li>• Include the following text amendment to the policy: “<i>The RSES supports delivery of the following road projects set out in Table 8.3 subject to appropriate environmental assessment and the outcome of the planning process</i>”</li> </ul> <p><u>Dublin-Belfast Economic Corridor</u></p> <ul style="list-style-type: none"> <li>• Clarify whether this is an RPO. <i>A regional environmental protection strategy should be developed in parallel with Brexit to firmly establish the protocols for environmental protection in the post Brexit situation and establish a process for transboundary communication.</i></li> </ul>	<p>developments: <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i></p> <p><b>RPO 3.4</b> states: <i>Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate. In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.</i></p> <p>The narrative associated with ‘Environmental Assessment’ sets out that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically, the Natura 2000 Network. Furthermore, feasibility studies will be supported by robust site / route selection processes which consider a full range of alternative modes and technologies.</p> <p>International gateways are presented in Section 8.5 International Connectivity</p> <p><b>RPO 8.15</b> includes reference to all transport modes.</p> <p>With regard to the water environment, <b>RPO 7.1</b> states: <i>To ensure consistency and alignment between the upcoming National Maritime Spatial Plan (due in 2021) and regional approaches to marine spatial planning and to integrate the Marine Strategy Framework Directive and Marine Spatial Planning implementation into future land use plans in the Region in recognition of the opportunity to harness Ireland’s ocean potential;</i> and <b>RPO 7.2</b> states: <i>To achieve and maintain ‘Good Environmental Status’ for marine waters and to ensure the sustainable use of shared marine resources in the Region, and to promote the development of a cross-boundary and</i></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>EMRA should consider a feasibility study to examine and establish infrastructure demands and needs, and identify areas which would be targeted for development, subject to environmental assessments.</li> </ul> <p><u>Park and Ride</u></p> <ul style="list-style-type: none"> <li>Include the following text amendment to the policy: “RPO - The RSES supports delivery of the following strategic park and ride projects set out in Table 8.4 <i>subject to appropriate environmental assessment and the outcome of the planning process</i>”</li> <li>To give context, the list would benefit from stating which mode is being served in these areas (bus, rail, LUAS etc.)</li> </ul> <p><u>Walking and Cycling</u></p> <ul style="list-style-type: none"> <li>Clarify whether this is an RPO.</li> <li>Investment priorities for cycleways should require a commitment to feasibility and route selection studies with a view to identifying and subsequently avoiding high sensitivity feeding or nesting points for birds and other sensitive fauna.</li> <li>Inclusion of a specific policy which requires a buffer distance to be maintained from coastal areas, particularly those subject to current and future erosion.</li> <li>Cycle Access: Appropriate environmental assessments need to be carried out upon route selection.</li> <li>It is noted that this objective has not been given RPO status, and strongly recommended that this policy be given greater acknowledgement. Improved walking and cycling routes is highly advantageous to human health and is a key factor in sustainable transport improvements.</li> </ul> <p><b>International Connectivity:</b></p> <p><u>Dublin Airport</u></p> <ul style="list-style-type: none"> <li>Include an objective to encourage environmental assessment of the masterplan for Dublin Airport to better inform land use planning and environmental protection in the region.</li> <li>Include an objective to engage with DTTAS to ensure timely delivery of the legislation implementing Regulation 598.</li> </ul> <p><u>Other Ports’ Policies (applicable to all ports)</u></p> <ul style="list-style-type: none"> <li>Include a specific policy: “<i>In recognising the opportunity to harness Ireland’s ocean potential, particular regard should be given to the Marine Strategy Framework Directive and Ireland’s Programme of Measures, as well as Ireland’s forthcoming Maritime Spatial Plan [due 2021].</i>”</li> </ul>	<p><i>cross-border strategic management and stakeholder engagement framework to protect the marine environment.</i></p> <p><b>RPOs 8.8. 8.8 and 8.10</b> regarding the Transport Investment Priorities references “... <i>subject to the outcome of appropriate environmental assessment and the planning process.</i>”</p> <p>Buffer/setback distances are referenced in a new <b>RPO 7.26</b> under the Environment chapter, stating: <i>Support the development of guidance for assessment of proposed land zonings in order to achieve appropriate riparian setback distances that support the attainment of high ecological status for water bodies, the conservation of biodiversity and good ecosystem health, and buffer zones from flood plains.</i></p> <p>With regard to references to feasibility studies and carrying capacity of ports, <b>RPO 8.24</b> states the following: <i>EMRA supports the undertaking of feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPAs and SACs.</i></p> <p>Under the narrative on Sea Ports the text states that the approach to port development in the Region shall adhere to the European Commission guidelines on the Implementation of the Birds and Habitats Directives in Estuaries and Coastal Zones.</p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>• Include a specific requirement to undertake feasibility studies to determine the carrying capacity of ports in relation to potential for likely significant effects on associated European sites including SPA and SAC.</li> <li>• Harnessing Our Ocean Wealth states that 'Irish ports are important nodes where future renewable and offshore energy projects could be based to stimulate new employment and investment opportunities.' Include a policy to undertake a feasibility study to examine the different options and potential for facilitating renewable energy development at ports.</li> <li>• The approach to port development in the EMR must adhere to the European Commission guidelines on the Implementation of the Birds and Habitats Directives in Estuaries and <i>Coastal Zones</i> in order to protect the European Sites around them.</li> </ul> <p><b>International Connectivity General Mitigation:</b></p> <ul style="list-style-type: none"> <li>• Include the text "Development proposals will be subject to environmental assessment and feasibility where assessment has not already taken place" as a specific policy.</li> <li>• For Dublin Port, Regional Ports and Other Ports, the previous mitigation remains relevant, and these policies would benefit from the addition of the need for appropriate feasibility and environmental assessments.</li> </ul>	
<p><b>Quality of Life</b></p>	<p><b>General Mitigation</b> A high level objective should be included that recognises the potential biodiversity importance of the various settlements particularly European sites and their qualifying features and "mainstreams" them into the planning process as recommended by the National Biodiversity Action Plan 2017-2021.</p> <p><b>Population and Demographic Change</b> Initiatives will be <i>subject to robust site / route selection and appropriate environmental assessment</i>.</p> <p><b>Housing and Regeneration</b> These policies could be improved by noting that implementation is subject to having regard to ensuring the minimisation of any impacts to the environment.</p> <p><b>Social Inclusion and Economic Opportunity</b></p> <ul style="list-style-type: none"> <li>▪ Include the need for robust site selection and appropriate environmental assessment to inform decision making in relation to new school sites.</li> <li>▪ <b>Healthy Communities</b></li> <li>▪ In relation to the policy that local authorities shall seek to support the planned provision of easily accessible social, community, cultural and recreational facilities, this policy would benefit from noting that this objective will be</li> </ul>	<p><b>RPO 3.5</b> references site selection and <b>RPO 4.2</b> references appropriate phasing of development.</p> <p>Regarding high level objective, the three key cross cutting principles set out in the RSES reflect the three pillars of sustainability, social, environmental and economic. These have informed the set of 16 Regional Strategic Outcomes (RSOs) which are closely aligned and supportive with the National Strategic Outcomes (NSOs) of the National Planning Framework and the UN Strategic Development Goals. These have also been developed in iteration with the Strategic Environmental Outcomes of the SEA process.</p> <p><b>RSO 1</b> relates to sustainable growth, <b>RSOs 8 and 9</b> addresses our transition to a low carbon and climate resilient society and <b>RSO 7</b> relates to the sustainable management of water, waste and other environmental resources and to realise the benefits of the circular economy. <b>RSO 11</b> commits to promoting coordinated spatial planning to conserve and enhance the biodiversity of protected habitats and species including landscape and heritage protection.</p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<p>implemented subject to having regard to ensuring the minimisation of any impacts to the environment. This policy would further benefit from having the guidance reinstated into the wording of the RPO <i>subject to appropriate environmental considerations.</i></p> <ul style="list-style-type: none"> <li>▪ In relation to health centre development, this policy would benefit from cross reference to the specific needs of an aging population.</li> </ul> <p><b>Access to RTS, Culture, Language and Heritage</b></p> <ul style="list-style-type: none"> <li>▪ Heritage-led regeneration plans must consider impacts to other environmental receptors with particular attention paid to bats.</li> <li>▪ Heritage-led regeneration plans shall consider historical setting/ landscape character and potential for negative effects related to visitor pressure.</li> <li>▪ The RPO on promoting equality of access to and engagement in arts and cultural services would still benefit from acknowledgement to consider historical setting / landscape character and potential for negative effects related to visitor pressure as previously mentioned in assessment.</li> <li>▪ Regarding the redevelopment of historic sites, it is advised that RPO should highlight the importance of site selection and associated environmental/planning assessments which are required prior to development.</li> <li>▪ The new policy on regeneration would benefit from having guidance reinstated into RPO subject to appropriate environmental considerations.</li> </ul>	<p><b>RPO 3.4</b> stipulates: <i>Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate. In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.</i></p> <p>The narrative associated with 'Environmental Assessment' sets out that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically, the Natura 2000 Network. Furthermore, feasibility studies will be supported by robust site / route selection processes which consider a full range of alternative modes and technologies.</p> <p><b>RPO 3.7:</b> <i>Local Authorities shall have regard to environmental and sustainability considerations for meeting sustainable development targets and climate action commitments, in accordance with the National Adaptation Framework. In order to recognise the potential for impacts on the environment, Local Authorities shall address the proper site/route selection of any new development and examine environmental constraints including but not limited to biodiversity, flooding, landscape, cultural heritage, material assets, including the capacity of services to serve any new development.</i></p> <p>Regarding an aging population, <b>RPO 9.12</b> states: <i>In Planning policy formulation and implementation Local Authorities and other stakeholders shall be informed by the need to cater for all levels of disability, through the appropriate mitigation of the built environment, and in particular on the needs of an ageing population;</i> while <b>RPO 9.23</b> states: <i>Facilitate the development of primary health care centres, hospitals, clinics, and facilities to cater for the specific needs of an ageing population in appropriate urban areas in accordance with the RSES settlement strategy and core strategies of development plans.</i></p> <p>Guiding Principles in the RSES for Health Placemaking provides that open space to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, green infrastructure and key landscape features in their design.</p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
		Regarding regeneration, guiding principles are included for urban infill and brownfield regeneration.
Infrastructure	<p><b>Water Supply</b></p> <ul style="list-style-type: none"> <li>▪ These objectives could be strengthened by provision of specific actions to ensure any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</li> <li>▪ These objectives could also be strengthened by provision of a water supply contingency in the short to medium term should projects such as the Water Supply Project get delayed in the planning process.</li> <li>▪ Suggested text amendment: <i>“The Regional Assembly and Local Authorities shall liaise and cooperate with Irish Water to ensure the delivery of Irish Water’s Investments and other relevant investment works programme of Irish Water that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and Local Authority Core Strategies, and provide for long term solutions for waste water treatment for the Region, <u>subject to appropriate environmental assessment and the planning process.</u>”</i></li> </ul> <p><b>Wastewater Treatment</b></p> <ul style="list-style-type: none"> <li>▪ These objectives could be strengthened by provision of specific actions to ensure any wastewater treatment development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</li> </ul> <p><b>Surface Water</b></p> <ul style="list-style-type: none"> <li>▪ These objectives could be strengthened by provision of specific actions to ensure any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</li> <li>▪ For LA surface water drainage systems, recommend the reintegration of the SuDS Guiding Principles into the text of the policy itself: <i>“Local Authorities shall ensure adequate surface water drainage systems are in place which meet the requirements of the Water Framework Directive and the associated River Basin Management Plans, with the following guiding principles shall be incorporated into Development plans and LAPs:</i> <ul style="list-style-type: none"> <li>▪ <u><i>Include policies and actions to encourage the integration of ‘soft’ measures including SUDs, green space and permeable surfaces in the design of drainage and sustainable water management of existing and future developments.</i></u></li> </ul> </li> </ul>	<p>The issues raised are addressed through the following RPOs:</p> <p><b>RPO 3.5:</b> <i>Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</i></p> <p><b>RPO 10.1:</b> <i>Local Authorities shall include proposals in Development Plans to ensure the efficient and sustainable use and development of water resources and water services infrastructure in order to manage and conserve water resources in a manner that supports a healthy society, economic development requirements and a cleaner environment.</i></p> <p><b>RPO 10.3:</b> <i>The Regional Assembly and Local Authorities shall liaise and cooperate with Irish Water to ensure the delivery of Irish Water’s Investments and other relevant investment works programme of Irish Water that will provide infrastructure to increase capacity to service settlements in accordance with the settlement strategy of the RSES and Local Authority Core Strategies, and provide for long term solutions for waste water treatment for the Region.</i></p> <p><b>RPO 10.5:</b> <i>Work closely with Irish Water to revise the Draft Investment Plan (2020- 2024) and subsequent investment plans to align the supply of water services with the settlement strategy and objectives of the EMRA Regional Spatial and Economic Strategy.</i></p> <p><b>RPO 10.6:</b> <i>Delivery and phasing of services shall be subject to the required appraisal, planning and environmental assessment processes and shall avoid adverse impacts on the integrity of the Natura 2000 network.</i></p> <p><b>RPO 10.7:</b> <i>Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Local Authorities and demonstrate phased infrastructure – led growth that is commensurate with the carrying capacity of water services and</i></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ <u>Identify areas where SuDS will or may be required to be incorporated.</u></li> <li>▪ <u>Include objectives requiring the use of SuDS in public and private developments in urban areas, both within developments and within the public realm to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks.</u></li> <li>▪ <u>Take opportunities to enhance biodiversity and amenity and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned. Plans and projects that have the potential to negatively impact on Natura 2000 sites should be subject to the requirements of the Habitats Directive (Appropriate Assessment)</u></li> <li>▪ <u>Encourage the use of Green Roofs where expansive roofs are proposed such as industrial, apartment, civic, commercial, leisure and educational buildings, and non-porous surfacing to create safe places.</u></li> <li>▪ <u>Seek to reduce the extent of hard surfacing and paving as well as requiring the use of sustainable drainage techniques. Where possible, consideration should be given to measures that have benefits for both WFD and flood risk management objectives, such as natural water retention measures, and also for biodiversity and potentially other objectives.”</u></li> </ul> <p><b>Energy Infrastructure</b></p> <ul style="list-style-type: none"> <li>▪ The objective could be strengthened by provision of specific actions to ensure any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</li> <li>▪ It is recommended to re-include the guiding principles for energy infrastructure under a specific RPO to give clarity to lower planning levels: “<i>Local Authority Development Plans shall facilitate the provision of energy networks in principle based on the following guiding principles and considerations:</i> <ul style="list-style-type: none"> <li>▪ <u>The development is required in order to facilitate the provision or retention of significant economic or social infrastructure;</u></li> <li>▪ <u>The route proposed has been identified with due consideration for social, environmental and cultural impacts;</u></li> <li>▪ <u>The design is such that it will achieve least environmental impact;</u></li> <li>▪ <u>Where impacts are inevitable mitigation features have been included;</u></li> <li>▪ <u>Where it can be shown that the proposed development is consistent with international best practice with regard to materials and technologies and that it will ensure a safe, secure, reliable, economic and efficient high-quality network.</u></li> </ul> </li> </ul>	<p>prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.</p> <p><b>RPO 8.25:</b> Local Authorities shall: Support and facilitate delivery of the National Broadband Plan.</p> <p><b>RPO 7.12:</b> Future statutory landuse plans shall include Strategic Flood Risk Assessment (SFRA) and seek to avoid inappropriate land use zonings and development in areas at risk of flooding and to integrate sustainable water management solutions (such as SUDS, nonporous surfacing and green roofs) to create safe places in accordance with the Planning System and Flood Risk Assessment Guidelines for Local Authorities.</p> <p>The RSES includes the following Guiding Principles for SuDs which are to be incorporated into Development Plans and LAPs as follows:</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• identify areas where SuDS will or may be required to be incorporated.</li> <li>• include objectives requiring the use of SuDS in public and private developments in urban areas, both within developments and within the public realm to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flooding risks</li> <li>• take opportunities to enhance biodiversity and amenity and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned. Plans and projects that have the potential to negatively impact on Natura 2000 sites should be subject to the requirements of the Habitats Directive</li> <li>• encourage the use of Green Roofs where expansive roofs are proposed such as industrial, apartment, civic, commercial, leisure and educational buildings, and non-porous surfacing to create safe places</li> </ul>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
	<ul style="list-style-type: none"> <li>▪ <u>In considering facilities of this nature that traverse a number of counties or that traverse one county in order to serve another, Planning Authorities should consider the proposal in light of the criteria outlined above. It is important that planning authorities are engaged in early consultation and discussion with the relevant Transmission System Operator.</u></li> <li>▪ <u>Corridors for energy transmission or pipelines should avoid creating sterile lands proximate to key public transport corridors, particularly rail routes, and in built up urban areas.”</u></li> </ul> <p><b>Communications Network and Digital Infrastructure</b></p> <ul style="list-style-type: none"> <li>▪ The objective could be strengthened by provision of specific actions to ensure any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</li> <li>▪ Guidelines should be developed to support an assist the efficient roll out and delivery of national broadband.</li> </ul> <p><b>Waste Management</b></p> <ul style="list-style-type: none"> <li>▪ The objective could be strengthened by provision of specific actions to ensure any development is supported by a quality site/route selection process that addresses environmental concerns such as landscape, cultural heritage and biodiversity as a minimum.</li> </ul>	<ul style="list-style-type: none"> <li>• seek to reduce the extent of hard surfacing and paving as well as requiring the use of sustainable drainage techniques. Where possible, consideration should be given to measures that have benefits for both WFD and flood risk management objectives, such as natural water retention measures, and also for biodiversity and potentially other objectives.</li> </ul> <p><b>RPO 10.20:</b> <i>Support and facilitate the development of enhanced electricity and gas supplies, and associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.</i></p> <p>Guiding Principles for Local Authority Development Plans to facilitate the provision of energy networks included in the RSES are as follows::</p> <ul style="list-style-type: none"> <li>• The development is required in order to facilitate the provision or retention of significant economic or social infrastructure;</li> <li>• The route proposed has been identified with due consideration for social, environmental and cultural impacts;</li> <li>• The design is such that it will achieve least environmental impact;</li> <li>• Where impacts are inevitable mitigation features have been included;</li> <li>• Where it can be shown that the proposed development is consistent with international best practice with regard to materials and technologies and that it will ensure a safe, secure, reliable, economic and efficient high-quality network.</li> </ul>
<b>All Ireland Cohesion</b>	RPO 11.1: There is further scope to provide guidance on the approach to strengthen connections whilst addressing environmental concerns.	<p>The narrative includes a section on ‘Managing of our Environment’. Additional text has been included on the importance of cross-border co-ordination and management.</p> <p><b>RPO 7.2</b> states: <i>To achieve and maintain ‘Good Environmental Status’ for marine waters and to ensure the sustainable use of shared marine resources in the Region, and to promote the development of a cross-boundary and cross-border strategic management and stakeholder engagement framework to protect the marine environment.</i></p>

Reference	Proposed Mitigation Measure / Recommendations	How has this been addressed in the RSES?
		<p><b>RPO 11.1</b> states: <i>In co-operation with relevant departments in Northern Ireland, the Eastern and Midlands Regional Assembly, and where appropriate in association with the Northern and Western Regional Assembly, will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning, economic growth and related spheres.</i></p>
<p><b>Implementation and Monitoring</b></p>	<p>Baseline data should be updated on at least a 4 yearly cycle to coincide with the EPA state of the environment reporting.</p> <p>An objective should be included committing to corrective action where short-falls in implementation are identified or unforeseen impacts arise as a result of monitoring.</p> <p>The implementation strategy should specifically reference to the SEA monitoring programme.</p>	<p>The section of the RSES relating to Monitoring and Reporting states that the EMRA is strongly committed to the preparation of evidence-based strategies and plans and this is demonstrated in the baseline data gathering and the preparation of Regional Profiles, which informed the development of the RSES. As part of this commitment EMRA will make available the baseline data as a shared evidence base for the Region and encourages other public bodies and Local Authorities to use this data, particularly to inform the preparation and implementation of County and City Development Plans, Local Area Plans, and Local Economic and Community Plans.</p> <p>The narrative of this section states that baseline data shall be updated on at least a four yearly cycle to coincide with the EPA state of the environmental reporting and shall take account of the monitoring requirements in the SEA. The following two RPOs are also included:</p> <p><b>RPO 12.1:</b> <i>Following adoption of the RSES EMRA will establish a RSES implementation group to oversee progress on the implementation of the RSES and to identify opportunities to drive regional development and leverage new funding, partnership and collaboration opportunities in the Region.</i></p> <p><b>RPO 12.5:</b> <i>EMRA will carry out a regular update of baseline data for monitoring purposes and will make this data publicly available to facilitate evidence based policy making and evaluation in the Region.</i></p>

### 3 PROPOSED SFRA MITIGATION STRATEGY

SFRA Mitigation Strategy	How has this been addressed in the RSES?
<p>The EMRA RSES has included objectives (as show in Table 5-2 of the RFRA Report, prepared under separate cover) that recommend that subsequently produced county and city development plans carry out flood risk assessments in accordance with the Guidelines, following the sequential approach to ensure development is carried out in a sustainable manner with respect to flood risk. Objectives (as show in Table 5-2) were also included to ensure Local Authorities shall incorporate the recommendations of the CFRAM Flood Risk Management Plans into the development of local planning policy and decision making. This includes planned investment measures for managing and reducing flood risk and having due regard to the CFRAM flood maps and other flood maps as available.</p> <p>Lastly they have also included objectives for local authorities to implement policies that will reduce surface water runoff and also consider the potential impacts of climate change on flood extents.</p> <p>These policies will ensure that any development and regeneration areas that have been or will be identified as having a flood risk will be either be developed in accordance with the Guidelines or the appropriateness of their land zoning will be reviewed to ensure that development is sustainable and not increasing flood risk in other areas</p>	<p>As noted left. The following RPOs specifically deal with flooding considerations:</p> <p><b>RPO 7.12:</b> <i>Future statutory landuse plans shall include Strategic Flood Risk Assessment (SFRA) and seek to avoid inappropriate land use zonings and development in areas at risk of flooding and to integrate sustainable water management solutions (such as SUDS, non-porous surfacing and green roofs) to create safe places in accordance with the Planning System and Flood Risk Assessment Guidelines for Local Authorities.</i></p> <p><b>RPO 7.13:</b> <i>EMRA will work with local authorities, OPW and other relevant Departments and agencies to implement the recommendations of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented.</i></p> <p><b>RPO 7.14:</b> <i>Local Authorities shall take account of and incorporate into the development of local planning policy and decision making the recommendations of the Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.</i></p> <p><b>RPO 7.15:</b> <i>Local Authorities shall take opportunities to enhance biodiversity and amenities and to ensure the protection of environmentally sensitive sites and habitats, including where flood risk management measures are planned.</i></p>

## **Appendix B**

### **SEA/ AA/ RFRA Assessment of the Proposed Material Amendments**

# AMENDMENTS REPORTING

Environmental Assessment – SEA/AA/FRA

MDR1402Rp0018

Amendments  
Reporting  
F01

26<sup>th</sup> June 2019

# Contents

- 1 INTRODUCTION.....1**
- 1.1 Assessment Process.....1
- 2 ASSESSMENT OF AMENDMENTS .....2**
- 2.1 Assessment of Amendments to RSO .....2
- 2.2 Assessment of Amendments to RPO .....3
- 2.3 Assessment of Other Aspects of the RSES.....30

# 1 INTRODUCTION

The draft Eastern and Midlands Regional Spatial and Economic Strategy (RSES) went on public display in Q4 of 2018. Following the end of the consultation period in January 2019, the Eastern and Midland Regional Authority (EMRA) reviewed all of the submissions received and a directors Report was prepared. A series of Material Amendments to the draft RSES were then proposed on foot of this work.

As part of the process of developing the RSES, a Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Flood Risk Assessment (FRA) are being undertaken. To inform the Material Amendment stage of the RSES, the SEA, AA and FRA teams have assessed the proposed Material Amendments to determine the environmental consequences of the proposed Material Amendments. This document records the assessment and represents the supporting material with respect to Section (24.8)(b) of the Planning and Development Act 2000 (as amended).

The resulting *proposed Material Amendments to the draft Regional Spatial and Economic Strategy 2019-2030 Report* was put on public display between 15<sup>th</sup> March and 12<sup>th</sup> April 2019 along with the accompanying environmental documentation entitled *Environmental Reports*.

The submissions received were reviewed and responded to in the Director's Report and a series of recommendations in relation to the proposed Material Amendments were made i.e. to accept or reject them. The environmental documentation has been subsequently updated to review the status of the final amendments agreed.

## 1.1 Assessment Process

**Chapter 2** identifies the environmental consequences of the proposed material amendments and subsequent minor amendments made to the draft RSES. It should be noted that this document includes screening and assessment of significant impacts in the context of SEA, AA and FRA.

## 2 ASSESSMENT OF AMENDMENTS

### 2.1 Assessment of Amendments to RSO

REF.	Original Draft Text	Proposed Material Amendment	SEA / AA / FRA Assessment of Proposed Amendments to Draft RSES	Final RPO following Minor Non-Material Changes	SEA / AA / FRA Assessment of Proposed Amendments to Draft RSES
<b>Ch 2</b>	<b>Strategic Vision</b>				
RSO3	Support sustainable rural development by managing urban generated growth in areas under strong urban influence and by encouraging sustainable growth in areas that have experienced decline or stagnation.	Support sustainable rural development and <b>strengthen rural networks, economies and communities. Manage</b> urban generated growth in areas under strong urban influence and encourage sustainable growth in areas that have experienced decline or stagnation	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	No further changes proposed	
RSO4	Support the protection of the healthy natural environment to ensure clean air and water for all, and the provision of quality healthcare and services that support human health.	<b>Protect and enhance the quality of our built and natural environment to support active lifestyles including walking and cycling,</b> ensure clean air and water for all and quality healthcare and services that support human health	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	No further changes proposed	
RSO15	Develop and enhance regional accessibility between key regional growth centers to build economic resilience and support strengthened rural communities and economies including the blue-green economy and tourism.	<b>Protect and enhance international connectivity and regional accessibility to support economic development,</b> build economic resilience and support strengthened rural communities and economies including the blue-green economy and tourism.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	No further changes proposed	

## 2.2 Assessment of Amendments to RPO

REF.	Original Draft Text	Proposed Material Amendment	SEA / AA / FRA Assessment of Proposed Amendments to Draft RSES	Final RPO following Minor Non-Material Changes	SEA / AA / FRA Assessment of Proposed Amendments to Draft RSES
<b>Ch 3</b>	<b>Growth Strategy</b>				
3.2	Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.	None	No change	Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate. <b>In addition, the future strategic development of settlements throughout the Region will have full cognisance of the legal requirements pertaining to sites of International Nature Conservation Interest.</b>	Change made to ensure there is an overall general objective, applicable to all locations which takes account of the proximity of sites of international nature conservation interests. The additional text is welcomed for RPO 3.2 to add further strength to the policy base for the EMR. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
3.4	Local Authorities shall promote an Ecosystem Services Approach in the preparation of statutory land use plans	Move to Chapter 7	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		Proposals for land use designations and transport infrastructure shall undergo quantitative assessment of their impact on greenhouse gas emissions and shall be approved subject to their consistency with national and regional emissions reductions targets.	The addition of this policy is broadly positive for AQ, CF in particular as it relates to a reduction in GHG emissions. Indirect long-term positive impacts would also be anticipated for W, BFF, S, and PHH in the context of limiting the negative effects of climate change. Tools such as PAS Carbon Management in Infrastructure can be used to assist in the quantification although further guidance may be needed on other appropriate tools. While approval subject to consistency with national and regional emissions reductions targets is positive, it is noted that any new land use designation or transport infrastructure can have localised, regional or national positive/negative impacts. Given that all national and regional emissions targets are for reduction, this could rule out a number of projects that may have an overall positive impact but may score negatively on quantification. It is therefore suggested that the RPO should state the following: and shall be approved subject to their consistency with national and regional emissions reductions policies.	<b>City and County Development Plans shall undergo assessment of their impact on carbon reduction targets and shall include measures to monitor and review progress towards carbon reduction targets.</b>	Wording has been amended to acknowledge forthcoming supporting methodology from government in terms of assessing the impact of city and county development plan strategies on carbon reductions targets and of measures to monitor and review progress towards implementation of those strategies. The amendment takes account of this but maintains the intention to measure and monitor carbon emissions from land use planning. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
<b>Ch 4</b>	<b>People and Place</b>				
4.1	In preparing Core Strategies for development plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the draft RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region.	In preparing Core Strategies for development plans, Local Authorities shall determine the hierarchy of settlements in accordance with the hierarchy, guiding principles and typology of settlements in the draft RSES, within the population projections set out in the National Planning Framework to ensure that towns grow at a sustainable and appropriate level, by setting out a rationale for land proposed to be zoned for residential, employment and mixed-use development across the Region. Core Strategies shall also be developed having regard to the infill/brownfield targets set out in National Planning Framework National Policy Objectives 3a-3c.	The following was noted in the SEA for the NPF: Where infill and brownfield sites are utilised this is positive for PHH and MA but has the potential to negatively impact S as sites can have hazardous materials which require remediation. Disturbance of contaminated material may lead to mobilisation of leachates with consequent negative impacts for water, soils and indirectly for BFF. There is also potential for further negative impacts on BFF due to possible spread of Invasive Species. It has been noted in the baseline section that there is only one landfill in Ireland with the ability to process mildly contaminated inert materials. This has implications for the levels of contaminated waste which could be generated through the use of infill and brownfield sites for provision of housing, particularly in urban areas where there have been historic industry uses or old dumping	None	No change

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			<p>sites. There may also be negative impacts to W due to additional demand on water and wastewater services which may already be operating at or above capacity. Water and wastewater services should be delivered on a phased basis to match projected demand. Furthermore the following mitigation was proposed in the NPF for NPO3c: A map is to be developed by each local authority, coordinated at the Regional Assembly level, showing potential infill and brownfield opportunities in order to spatially inform decision making on the suitability of these sites for further development or regeneration.</p> <p>At the time of finalisation of the NPF, the DHPLG indicated that this mitigation measure would be addressed through the RSES. At the time of finalisation of the NPF, the DHPLG indicated that this mitigation measure would be addressed through the RSES. It is acknowledged that a new guiding principal has been added [amendment 120] which addresses this requirement.</p>		
4.2	<p>Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p>	<p>Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available <b>or planned to</b> match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p>	<p>The addition of "or planned" to RPO 4.2 has the potential direct, indirect and cumulative negative effects on PHH, BFF, W, S and other environmental receptors as it introduces the possibility that developments are permitted before essential services are secured and fully committed. Planned essential services can be held up for many reasons including political, legal, planning and funding reasons among others. Where development on residential and employment lands is advanced without certainty around service delivery, there is an increased risk of direct and indirect environmental impact in the short to medium term until services catch up. It is therefore recommended that the original wording of RPO4.2 is used to reduce the risks in this regard.</p>	Amendment rejected	As per original assessment for RPO 4.2. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
4.4	<p>A cross-boundary Joint Urban Area Plan (UAP) shall be prepared by Westmeath County Council and Roscommon County Council to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Athlone and the Monksland/Bealnamulla area. The Joint UAP shall ensure that Athlone achieves targeted compact brownfield / infill growth of a minimum of 30%. The Joint UAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development. Future development required to achieve the growth vision for Athlone included in the Joint UAP shall:</p> <p>i. Support the regeneration of underused, vacant or derelict town centre lands for residential</p>	<p>A cross-boundary Joint Urban Area Plan (UAP) shall be prepared by Westmeath County Council and Roscommon County Council <b>in collaboration with the two Regional Assemblies</b> to provide a coordinated planning framework for the future physical, economic and social development of Athlone. <b>The Joint UAP shall identify Athlone's functional urban area and adopt a boundary for the plan area in addition to the identification of strategic housing and employment development areas and infrastructure and investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development, in order to realise Athlone's status as a Regional Growth Centre.</b></p>	<p>As per assessments previously undertaken for Athlone.</p> <p>The importance of Athlone in the context of proximity to significant sites of nature conservation interest recognised for their European and national importance is re-iterated here for clarity. The development of Athlone as a Regional Growth Centre has the potential for negative impacts on BFF and W in particular and as such the joint UAP must recognise and reflect the increased sensitivity of constraint in the area and the risk for adverse effects alone and in combination with other plans and projects on sites of nature conservation interest, their habitats and their species.</p>	<p>A cross boundary <b>statutory</b> Joint Urban Area Plan (UAP) for the Regional Growth Centre of Athlone shall be jointly prepared by Westmeath and Roscommon County Councils in collaboration with EMRA and NWRA. <b>The UAP will support, the development of Athlone as an attractive, vibrant and highly accessible Regional Centre and economic driver for the centre of the Country.</b> The Joint UAP will identify Athlone's functional urban area and outline a boundary for the plan area, in addition to the identification of strategic housing and employment development areas and the infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development.</p>	<p>As per assessment for proposed material amendment.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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	<p>development to facilitate population growth.</p> <p>ii. Support the renewal of lands at St. Mels and Loughanaskin to optimise the potential of this town centre opportunity to facilitate a mixed residential scheme with supporting services and facilities which will support the commercial core of the town, reinforce neighbourhood identity and enhance the physical character of the area.</p> <p>iii. Support residential development within the Lissywollen South Framework Plan area to develop this strategically located land bank as a highly sustainable and integrated new urban quarter extending from Athlone town centre.</p> <p>iv. Support residential development on existing LAP lands at Curragh Lissywollen, Cornamag, Cornamaddy and Monksland / Bellanamullia.</p>				
		<p><b>Support the regeneration of underused town centre and brownfield / infill lands along with the delivery of existing zoned and serviced lands to facilitate significant population growth and achieve sustainable compact growth target of 30% of all new homes to be built within the existing built up urban area.</b></p>	<p>As per assessments previously undertaken for Athlone.</p> <p>The following was noted in the SEA for the NPF: <i>Where infill and brownfield sites are utilised this is positive for PHH and MA but has the potential to negatively impact S as sites can have hazardous materials which require remediation. Disturbance of contaminated material may lead to mobilisation of leachates with consequent negative impacts for water, soils and indirectly for BFF. There is also potential for further negative impacts on BFF due to possible spread of Invasive Species. It has been noted in the baseline section that there is only one landfill in Ireland with the ability to process mildly contaminated inert materials. This has implications for the levels of contaminated waste which could be generated through the use of infill and brownfield sites for provision of housing, particularly in urban areas where there have been historic industry uses or old dumping sites. There may also be negative impacts to W due to additional demand on water and wastewater services which may already be operating at or above capacity. Water and wastewater services should be delivered on a phased basis to match projected demand.</i></p> <p>Furthermore the following mitigation was proposed in the NPF for NPO3c: <i>A map is to be developed by each local authority, coordinated at the Regional Assembly level, showing potential infill and brownfield opportunities in order to spatially inform decision making on the suitability of these sites for further development or regeneration.</i></p> <p>At the time of finalisation of the NPF, the DHPLG indicated that this mitigation measure would be addressed through the RSES. It is acknowledged that a new guiding principal has been added [amendment 120] which addresses this requirement.</p>	None	No change
4.5	Promote the expansion of the existing enterprise ecosystem in Athlone and creation or expansion of distinct industrial specialisms that have	Promote Athlone as a key location for regional economic development supporting the provision of increased employment through the expansion	As per assessments previously undertaken for Athlone.	Promote Athlone as a key location for regional economic development supporting the provision of increased employment through the expansion	Smart Specialisation is based on partnerships between businesses, public entities and knowledge institutions. The addition of this

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	<p>developed through collaboration with the relevant enterprise agencies including AIT, IDA and the Midlands Innovation and Research Centre and support the provision of physical infrastructure and zoned lands to realise this objective. In this regard, recognise the following strategic economic areas:</p> <ul style="list-style-type: none"> <li>i. Garrycastle IDA as a centre of excellence for education, research, enterprise and innovation with potential for clustering with Athlone Institute of Technology</li> <li>ii. Blyry – incorporating indigenous and existing industries</li> <li>iii. Creggan – greenfield site identified for future development of an innovative business park</li> <li>iv. Monksland – support the continued development of the existing industrial sectors at this location.</li> </ul>	<p>of the existing enterprise ecosystem in Athlone and creation or expansion of distinct industrial specialisms that have developed through collaboration with the relevant enterprise agencies including the IDA, Athlone Institute of Technology and the Midlands Innovation and Research Centre and support the provision of physical infrastructure and zoned lands to realise the phased delivery of strategic employment lands in central accessible locations.</p>	<p>The importance of Athlone in the context of proximity to significant sites of nature conservation interest recognised for their European and national importance is re-iterated here for clarity. The development of Athlone as a Regional Growth Centre has the potential for negative impacts on BFF and W in particular and the identification and delivery of future physical, economic and social development must recognise and reflect the increased sensitivity of constraint in the area and the risk for adverse effects alone and in combination with other plans and projects on sites of nature conservation interest, their habitats and their species.</p>	<p>of the existing enterprise ecosystem in Athlone and smart specialisation, that have developed through collaboration with the relevant enterprise agencies including the IDA, Athlone Institute of Technology and the Midlands Innovation and Research Centre and support the provision of physical infrastructure and zoned lands to realise the phased delivery of strategic employment lands in central accessible locations.</p>	<p>reference adds clarity to the RPO but does not alter the intent and previous assessments.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>
4.7	<p>Promote Athlone as an urban tourism destination while protecting the natural resources on which it relies with a particular focus on capitalising on the following assets:</p> <ul style="list-style-type: none"> <li>i. Amenity potential of the waterways including the River Shannon and Lough Ree</li> <li>ii. Athlone's attractive built and cultural heritage including the Western bank of the river as a cultural and tourism quarter</li> <li>iii. Fáilte Ireland Lakelands and Ireland's Hidden Heartlands designations</li> <li>iv. Existing and planned Greenways and Blueways including the Galway to Dublin Cycleway.</li> </ul>	<p>Support the development of a cross sectoral approach to promote Athlone as a key tourism destination in the Midlands, building on Fáilte Ireland's Hidden Heartlands brand and the forthcoming Shannon Tourism Masterplan to develop the recreation and amenity potential of waterways including the River Shannon and Lough Ree and the development of a greenway network including the Galway to Dublin Cycleway.</p>	<p>As per assessments previously undertaken for Athlone.</p> <p>The importance of Athlone in the context of proximity to significant sites of nature conservation interest recognised for their European and national importance is re-iterated here for clarity. The development of Athlone as a key tourism destination in the Midlands has the potential for negative impacts on BFF, W, S, LS and CH in particular. These impacts can arise from loss of habitat, disturbance of species from construction and operational activity (e.g. lighting, noise etc.); visual intrusion and alteration of landscape character, disturbance of archaeological or architectural features / material. Tourism plans must recognise and reflect the increased sensitivity of constraint in the area and the risk for adverse effects alone and in combination with other plans and projects on sites of nature conservation interest, their habitats and their species. Any tourism plans should establish potential carrying capacity of habitats and landscape to visitor pressure and include monitoring protocols, in line with RPO6.17 to monitor ongoing effects.</p> <p>As previously indicated in the NIR prepared for the draft RSES, policy wording in the RSES should recognise that at the project consent stage, if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated, then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p>	None	No change
		<p><b>Support ongoing implementation of flood risk management and flood alleviation measures to facilitate the growth of Athlone subject to the outcome of appropriate environmental assessment and taking account of the proximity of sites of international nature conservation interest.</b></p>	<p>The reference to appropriate environmental assessment is welcomed in this policy. Furthermore it is noted that mitigation measures have been provided as part of the SEA and AA of the Shannon CFRAM and these should be fully implemented to ensure no potential for significant effects on site integrity given the proximity of the Athlone and the network of</p>	<p><b>Support ongoing implementation of flood risk management and flood alleviation measures to facilitate the growth of Athlone.</b></p>	<p>The reference to ...subject to the outcome of appropriate environmental assessment and taking account of the proximity of sites of international nature conservation interest has been removed. It is acknowledged that an additional text has been added to RPO 3.2 above to ensure an overall general objective is presented early in the RSES, applicable to all</p>

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			<p>pathways from Athlone to the European sites along the Shannon.</p> <p>As previously indicated in the NIR prepared for the draft RSES, policy wording in the RSES should recognise that at the project consent stage, if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated, then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p>		<p>locations which takes account of the proximity of sites of international nature conservation interests. For this reason, no additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>
		<p><i>Support the development of joint Economic, Transport and Retail plans by Westmeath County Council and Roscommon County Council in collaboration with the relevant agencies to facilitate the growth of Athlone as a regional economic driver and to realise its status as a Regional Growth Centre.</i></p>	<p>The importance of Athlone in the context of proximity to significant sites of nature conservation interest recognised for their European and national importance is re-iterated. The development of Athlone as a Regional Growth Centre has the potential for negative impacts on environmental receptors and BFF and W in particular. As such the joint plans must recognise and reflect the increased sensitivity of constraint in the area and the risk for adverse effects alone and in combination with other plans and projects on sites of nature conservation interest, their habitats and their species.</p>	<p>Support the development of joint economic, transport and retail plans by Westmeath and Roscommon County Councils in collaboration with, and where appropriate, relevant Local Authorities and relevant agencies, to facilitate the growth of Athlone as a regional economic driver.</p>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan which includes reference to collaboration with local authorities and deletion of wording relating to status as a regional growth centre. Athlone as a growth centre has already been assessed in preceding versions of the plan and the relative sensitivities have been identified.</p>
4.8	<p>A cross-boundary Joint Urban Area Plan (UAP) shall be prepared by Louth County Council and Meath County Council to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Drogheda to ensure it achieves targeted compact brownfield / infill growth of a minimum of 30% and ensure a co-ordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre on the Dublin – Belfast Corridor. The Joint UAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development. Future development required to achieve the growth vision for Drogheda included in the Joint UAP shall:</p> <p>i. Provide for the sustainable, compact, sequential growth and urban regeneration in the town core by promoting the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.</p> <p>ii. Support the regeneration of the Westgate area of Drogheda’s historic town centre to address vacancy and dereliction in the town core and as an alternative to new development on green field sites.</p> <p>iii. Facilitate the regeneration of lands at McBride Station and environs as an employment hub to capitalise on existing and</p>	<p>A cross-boundary Joint Urban Area Plan (UAP) shall be prepared by Louth County Council and Meath County Council to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Drogheda to ensure it achieves targeted compact brownfield / infill growth of a minimum of 30% and ensure a co-ordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre on the Dublin – Belfast Corridor. The Joint UAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development. Future development required to achieve the growth vision for Drogheda included in the Joint UAP shall:</p> <p>i. Provide for the sustainable, compact, sequential growth and urban regeneration in the town core by promoting the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.</p> <p>ii. Support the regeneration of the Westgate area of Drogheda’s historic town centre to address vacancy and dereliction in the town core and as an alternative to new development on green field sites.</p> <p>iii. Facilitate the regeneration of lands at McBride Station and environs as an employment hub to capitalise on existing and</p>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>	<p>A cross boundary <b>statutory</b> Joint Urban Area Plan (UAP) for the Regional Growth Centre of Drogheda shall be jointly prepared by Louth and Meath County Councils in collaboration with EMRA. <b>The UAP will support, the development of Drogheda as an attractive, vibrant and highly accessible Regional Centre and economic driver.</b> The joint UAP will provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Drogheda to ensure it achieves targeted compact brownfield / infill growth of a minimum of 30% and ensure a coordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre on the Dublin – Belfast <b>Economic</b> Corridor. The Joint UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development. The RSES envisages a population target of 50,000 is for the entire settlement of Drogheda up to 2031. This includes lands within the combined functional area of the two Local Authorities of Louth and Meath. The preparation and adoption of a statutory Joint Urban Area Plan (UAP) by Louth and Meath County Councils is to be a priority. <b>The joint UAP under agreement of both local authorities, is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of</b></p>	<p>It is noted that RPO 3.2 and other similar supporting RPOs will apply to all plans arising from the RSES. As such the distribution of population which should be generally in proportion to existing population levels in each local authority area will be informed by the carrying capacity of the receiving environment and the need to avoid adverse effects on any European site and will have full cognisance of the legal requirements pertaining to sites of conservation interest. This is articulated through the existing RPO base in the draft RSES.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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	<p>planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.</p> <p>iv. Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.</p>	<p>planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.</p> <p>iv. Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.</p> <p>v. <i>Support the sustainable development of existing zoned lands in the Southern Environs of the town with a particular emphasis on the promotion of the IDA Business Park as an employment hub and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs</i></p> <p>vi. <i>Support the implementation of the Urban Design Framework Plan for the Heritage Quarter</i></p>		<p>population which should be generally in proportion to existing population levels in each local authority area. In tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework the Joint UAP for the Regional Centre of Drogheda should endeavour to support and provide for the following:</p> <p>i. Provide for the sustainable, compact, sequential growth and urban regeneration in the town core by promoting the regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth.</p> <p>ii. Support the regeneration of the Westgate area of Drogheda's historic town centre to address vacancy and dereliction in the town core and as an alternative to new development on green field sites.</p> <p>iii. Facilitate the regeneration of lands at McBride Station and environs as an employment hub to capitalise on existing and planned public transport infrastructure, including the DART Expansion Programme whilst avoiding development that detracts from the town centre.</p> <p>iv. Provide for redevelopment or renewal of obsolete areas on lands at Mell / North Road.</p> <p>v. Support the sustainable development of existing zoned lands in the Southern Environs of the town with a particular emphasis on the promotion of the IDA Business Park as a location for economic investment and the creation of compact, residential communities in key locations in proximity to established residential areas and transport hubs</p> <p>vi. Support the implementation of the Urban Design Framework Plan for the Heritage Quarter.</p>	
		<p><i>Enhance Drogheda's role as a strategic employment centre on the Dublin-Belfast Economic Corridor and provide for employment opportunities through identification of suitable sites for new industry including FDI.</i></p>	<p>Given the natural and cultural sensitivities identified in the ER and NIR prepared for the draft plan, this new RPO will require similar mitigation to that already proposed in those documents and repeated below.</p> <p><i>Selection of sites should be supported by a quality site selection process and subject to detailed environmental assessment which is more appropriately addressed at the county level.</i></p> <p><i>While the Drogheda wastewater treatment plant is operating within its design capacity and considered to have sufficient headroom, the plant is listed as a Priority Urban Area and is failing more stringent treatment standards. As such, growth needs to be phased alongside improvements to wastewater treatment.</i></p> <p><i>Drogheda General: The expansion of or relocation of activities associated with ports and marinas will require a feasibility study to be undertaken in the first instance and recognition that in the absence of coastal zone management, there is potential negative impacts to European sites.</i></p>	<p>None</p>	<p>No change</p>

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4.15	<p>An Urban Area Plan (UAP) shall be prepared by Louth County Council for Dundalk to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of the town to ensure targeted compact growth of a minimum of 30% is achieved. The UAP shall facilitate the sustainable, compact, sequential growth and urban regeneration in the town core by consolidating the built footprint of Dundalk through regeneration of the town centre Core Character Area with a focus on rejuvenation of Clanbrassil Street / St. Nicholas Quarter and development of key town centre infill / brownfield sites in this area. A significant proportion of future urban development shall be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth. The UAP shall:</p> <ul style="list-style-type: none"> <li>i. Support development on key town centre infill/brownfield sites include Long Walk Shopping Centre, Carroll's Village Shopping Centre, Williamson's Mall, and Dunne's Park Street</li> <li>ii. Improve accessibility and sustainable mobility in the town centre by enhancing modal choice through integration of rail, bus and taxi services</li> <li>iii. Promote the Seatown / Port Harbour Area for regeneration and repurpose of a water based urban quarter</li> <li>iv. Facilitate Urban Expansion through development of the Mount Avenue masterplan lands.</li> </ul>	<p>An Urban Area Plan (UAP) shall be prepared by Louth County Council for Dundalk to provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of the town to ensure targeted compact growth of a minimum of 30% is achieved. The UAP shall facilitate the sustainable, compact, sequential growth and urban regeneration in the town core by consolidating the built footprint of Dundalk through regeneration of the town centre Core Character Area with a focus on rejuvenation of Clanbrassil Street / St. Nicholas Quarter and development of key town centre infill / brownfield sites in this area. A significant proportion of future urban development shall be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth. The UAP shall:</p> <ul style="list-style-type: none"> <li>i. Support development on key town centre infill/brownfield sites include Long Walk Shopping Centre, Carroll's Village Shopping Centre, Williamson's Mall, and Dunne's Park Street</li> <li>ii. Improve accessibility and sustainable mobility in the town centre by enhancing modal choice through integration of rail, bus and taxi services</li> <li>iii. Promote the Seatown / Port Harbour Area for regeneration and repurpose of a water based urban quarter</li> <li>iv. Facilitate Urban Expansion through development of the Mount Avenue masterplan lands.</li> <li>v. Support the implementation of the Dundalk Urban Design Framework Plan (2008) or any update thereof</li> </ul>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>	<p>A cross boundary statutory Urban Area Plan (UAP) shall be prepared by Louth County Council for the Regional Growth Centre of Dundalk in collaboration with the EMRA. <b>The UAP will support the development of Dundalk as an attractive, vibrant and highly accessible Regional Centre and economic driver.</b> The UAP will provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of the town to ensure targeted compact growth of a minimum of 30% is achieved. The UAP shall facilitate the sustainable, compact, sequential growth and urban regeneration in the town core by consolidating the built footprint of Dundalk through regeneration of the town centre Core Character Area with a focus on rejuvenation of Clanbrassil Street / St. Nicholas Quarter and development of key town centre infill / brownfield sites in this area. A significant proportion of future urban development shall be accommodated on infill/brownfield sites by encouraging development, including renewal and regeneration of underused, vacant or derelict town centre lands for residential development to facilitate population growth. The Joint UAP will identify a functional urban area and plan boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater coordination and sequential delivery of serviced lands for development. The RSES envisages a population target of 50,000 is for the entire settlement of Dundalk up to 2031. The preparation and adoption of a <b>statutory Urban Area Plan (UAP) by Louth County Council is to be a priority. The UAP is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population. In tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework the UAP for the Regional Centre of Dundalk should endeavour to support and provide for the following:</b></p> <ul style="list-style-type: none"> <li>i. Support development on key town centre infill/brownfield sites include Long Walk Shopping Centre, Carroll's Village Shopping Centre, Williamson's Mall, and Dunne's Park Street</li> <li>ii. To enhance accessibility and sustainable mobility within the town centre by improving links between the core and surrounding areas through the further integration of public transport, walking and cycling facilities.</li> <li>iii. Promote the Seatown / Port Harbour Area for regeneration and repurpose of a water based urban quarter</li> <li>iv. Facilitate Urban Expansion through development of the Mount Avenue masterplan lands.</li> <li>v. Support the implementation of the Dundalk Urban Design Framework Plan (2008) or any update thereof.</li> </ul>	<p>It is noted that RPO 3.2 and other similar supporting RPOs will apply to all plans arising from the RSES. As such the distribution of population which should be generally in proportion to existing population levels in each local authority area will be informed by the carrying capacity of the receiving environment and the need to avoid adverse effects on any European site and will have full cognisance of the legal requirements pertaining to sites of conservation interest. This is articulated through the existing RPO base in the draft RSES.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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4.24	Support the continued development of Swords as part of an emerging 'Green City' concept, building on its strategic location near Dublin Airport and linked to the delivery of Metrolink to provide for high density and people intensive uses in locations that are accessible to quality public transport nodes, existing and planned.	Support the continued development of Swords as a vibrant Key Town with a thriving economy; an integrated public transport network; an attractive and highly accessible built environment with the highest standards of housing, employment, services, recreational amenities and community facilities	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.  Given the proximity of Swords to European sites along the north Dublin coastline, wording in the RSES shall recognise that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.	None	No change
4.25	Future development required to achieve the growth vision for Swords shall: i. Support the regeneration of underused, vacant or derelict town centre lands for residential/mixed use development to facilitate population growth. ii. Provide for the sustainable, compact and sequential infill of yet-to-be developed Masterplan and Local Area Plan zoned lands along the R132 and future MetroLink corridor. iii. Require the preparation of a Local Area Plan at Lissenhall to inform policy for the longer term strategic area of Swords, in accordance with Your Swords: An Emerging City Strategic Vision 2035 or any update thereof.	Support the regeneration of underused town centre lands along with the planned and sequential infill opportunities to provide for high density and people intensive uses in accessible locations that are accessible to high quality transport, existing and planned, and to support the preparation of a Local Area Plan for the strategic landbank at Lissenhall for the longer-term development of Swords	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.  It is however noted that planned services can be held up for many reasons including political, legal, planning and funding reasons among others. Where development on residential and employment lands is advanced without certainty around service delivery, there is an increased risk of direct and indirect environmental impact in the short to medium term until services catch up.  Given the proximity of Swords to European sites along the north Dublin coastline, wording in the RSES shall recognise that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.	None	No change
4.26	Facilitate the strategic regeneration of Swords to increase the resilience of the local economy and provide for an enhanced urban environment with a particular focus on the following key objectives: i. Enhance the identity of the town centre through the development of Swords Civic Centre and Cultural Centre, the delivery of the conservation plan for Swords Castle, and the delivery of an enhanced public realm in Swords Town Centre, in accordance with a new healthy placemaking strategy to provide a prioritised, programmed and impactful package of measures to co-ordinate investment and decision making across multiple stakeholders. ii. Facilitate the creation of a new street fronting the river walk to the west of Main Street and support co-ordinated infill development on key strategic sites along Main Street and North Street. iii. Promote core recreational and amenity spaces, utilising in particular Ward River Valley Park, Swords Cultural Quarter including Town	Facilitate the strategic regeneration of Swords to build on the resilience of the local economy and provide for an enhanced urban environment with a particular focus on the development of Swords Civic Centre and Cultural Centre, the delivery of the conservation plan for Swords Castle, and the delivery of an enhanced public realm in the town centre and to promote recreational and amenity uses in accordance with a healthy placemaking strategy.	As per previous assessment and mitigation proposed in the SEA/AA/FRA for Swords.  Given the proximity of Swords to European sites along the north Dublin coastline, wording in the RSES shall recognise that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.	None	No change

REPORT

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	Park, Ward River Walk west of Main Street area.				
		Support Swords-Dublin Airport as a key location for airport related economic development and employment provision linked to the protection and enhancement of access to Dublin Airport lands including the delivery of Metrolink.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		Encourage transition towards sustainable and low carbon transport modes in Swords through the provision of high quality walking and cycling permeability offering direct routes to local destination and public transportation hubs.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
4.27	Support the continued development of Maynooth, co-ordinated with the delivery of strategic infrastructure including DART expansion to support future population growth and build on synergies with Maynooth University to promote research and economic development opportunities.	Support the continued development of Maynooth, co-ordinated with the delivery of strategic infrastructure including pedestrian and cycle linkages within the town and to the Royal Canal Greenway, DART expansion and road linkages forming part of the Maynooth Outer Orbital Route in a manner which supports future development and population growth and builds on synergies with Maynooth University promoting a knowledge-based economy	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		Support Maynooth as a key town to act as an economic driver for north Kildare and provide for strategic employment at key locations to improve the economic base of the town and provide for an increased number of local jobs.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		A cross boundary Joint Local Area Plan (LAP) shall be prepared by Kildare County Council and Meath County Council to provide a co-ordinated planning framework for the Maynooth area. The Joint LAP shall identify a boundary for the plan area, strategic housing and employment development areas and infrastructure investment requirements and promote greater co-ordination and sequential delivery of serviced lands for development.	As per assessments previously undertaken for Maynooth. Maynooth is in proximity to significant sites of nature conservation interest recognised for their European and national importance is re-iterated here for clarity. The development of Maynooth has the potential for negative impacts on BFF and W in particular and as such the joint UAP must recognise and reflect the increased sensitivity of constraint in the area and the risk for adverse effects alone and in combination with other plans and projects on sites of nature conservation interest, their habitats and their species.	None	No change
		To promote the consolidation of the town centre with a focus on the regeneration of underused buildings and strategic sites and the establishment of residential uses to encourage greater vibrancy outside of business hours and the enhancement of the public realm.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
4.28	Support the continued development of Bray including the enhancement of town centre functions, increased employment opportunities and the westward extension of the town, linked to the delivery of key infrastructure including Bray-Fassaroe public transport links.	Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour along with increased employment opportunities and co-ordination between Wicklow County Council and transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links.	There is potential for direct and indirect negative impacts on BFF and W in particular as a result of the amendments to this RPO. The area surrounding Bray has significant ecological constraints in the form of European and National protected sites. Any developments such as those mentioned must be subject to the outcome of appropriate environmental assessments. Wording in the RSES shall recognise that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated, then the proposals will only make	Support the continued development of Bray including the enhancement of town centre functions, development of major schemes at the former Bray golf course and Bray harbour, along with increased employment opportunities and co-ordination between Wicklow County Council, <a href="#">Dún Laoghaire Rathdown County Council</a> , and the transport agencies to facilitate the delivery of key infrastructure required for the westward extension of the town, including Bray-Fassaroe public transport links <a href="#">and road improvements</a> .	As noted in the proposed material amendment Bray has significant ecological constraints in the form of European and National protected sites. Any developments including road improvements now included must be subject to the outcome of appropriate environmental assessments. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

REPORT

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			provision for the level and location of development for which it can be concluded that there will be no adverse effect.		
		Support the development of Bray as a strategic employment location with a particular focus on attracting high value investment in 'people' based industries at accessible locations, in order to increase the number of local jobs.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		To promote the consolidation of the town centre with a focus on placemaking and the regeneration of strategic sites to provide for enhanced town centre functions and public realm, in order to increase Bray's attractiveness as a place to live, work, visit and invest in.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		To support ongoing investment in public transport infrastructure, including the appraisal, planning and design of the LUAS extension to Bray, to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity. The development of Bray-Fassaroe should be undertaken in collaboration between Wicklow County Council and the transport agencies to ensure the delivery of enabling transportation infrastructure.	There is potential for direct and indirect negative impacts on BFF and W in particular as a result of the amendments to this RPO. The area surrounding Bray has significant ecological constraints in the form of European and National protected sites. Any developments such as those mentioned must be subject to the outcome of appropriate environmental assessments. Wording in the RSES shall recognise that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.	To support ongoing investment in public transport infrastructure, including the appraisal, planning and design of the LUAS extension to Bray, to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity. The development of Bray-Fassaroe should be undertaken in collaboration between Wicklow County Council, <a href="#">Dún Laoghaire Rathdown County Council</a> and the transport agencies to ensure the delivery of enabling transportation infrastructure.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
		Encourage transition towards sustainable and low carbon transport modes through the promotion of alternative modes of transport and 'walkable communities' whereby a range of facilities and services will be accessible within short walking or cycling distance	This RPO is broadly positive, particularly with regard to PHH, AQ, CF and MA. Some potential for negative effects on BFF where disturbance may occur from cycling/ walking routes. This can be mitigated by proper route selection.	None	No change
4.29	Support the delivery of the distributor road at Farganstown to release strategic residential and employment lands for development.	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 the town	This amendment is directly at odds with the previous proposed RPO and has potential for negative direct and indirect impacts to PHH, AQ, CF, BFF, W, S, LandS and CH to facilitate a network of distributor roads. If there is a genuine desire to shift to low carbon transport modes, identification and development of employment and residential lands must be prioritised on the basis of their suitability for more sustainable transport modes. Recommended that this RPO is not altered in the manner proposed.	Support the delivery of <a href="#">road infrastructure</a> to release strategic residential and employment lands <a href="#">for sustainable development</a> and to improve connectivity and the efficient movement of people and services in the town.	As per assessment of material amendment however it is noted that the reference to a network of roads has been removed and sustainable development has been added. In addition a guiding principle has been added which states:  <i>Where additional road capacity is provided within or around any town which has an objective to cater for traffic that currently uses the road network in central areas and their immediate environs, that this additional capacity would be used for the improvement of the public transport, walking and cycling networks within the towns through the reallocation of road space to these modes.</i>  No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
		Support the development of strategic employment lands on the Trim Rd in Navan.	The location of the development lands is not clear from the RPO however, it is noted that the	Support the development of strategic employment lands on the Trim Road in Navan,	Additional reference is noted and welcomed as it acknowledges the sensitivities of the area and

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			Trim Road in Navan (most of the R161 directly south of Navan town centre) is in close proximity to the River Boyne and River Blackwater SAC and SPA (River Boyne about 1km to the east and River Boyne/Blackwater confluence about 1.5km to the north). As such any development of strategic employment lands in proximity to the River Boyne and Blackwater SAC/SPA and pNHA should consider all likely significant effects. Furthermore this RPO should state that any such development will be preceded by and subject to the outcome of the planning process and environmental assessments. The River Boyne to the north-east is also a designated nutrient sensitive area due to pressures from Navan WWTP, which, while it is within capacity and passing compliance, is impacting the river, which is currently at Moderate WFD status. As per the assessment in the SEA, further development must ensure that increased load on services does not degrade the water environment.	subject to the outcome of appropriate environmental assessment and the planning process.	the need for careful consideration of the potential of any projects / development to give rise to adverse impacts on an European site and other aspects of the receiving environment. Positive in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
4.34	Support the use of the Grand Canal for amenity, recreation and sustainable transport purposes.	Support the development of the Grand Canal for amenity, recreation and sustainable transport purposes including the Naas to Sallins and Naas to Corbally harbour greenways and linking these to the national Grand Canal Greenway.	As per previous assessment and mitigation proposed in the SEA ER and NIR for Naas. The additional mention of specific greenway projects to link to the Grand Canal Greenway is positive for PHH, MA, AQ and CF where walking and cycling is prioritised over other modes; however projects should be subject to environmental assessment and route selection as appropriate as they can also give rise to direct and indirect negative effects on W, BFF, S, LS and CH arising from ducting and cable laying along roads, loss of habitat and disturbance of species during construction, disturbance of species from lighting, pedestrians and cyclists etc. It will be necessary to demonstrate further through the plan hierarchy how these features will be delivered while conserving biodiversity.	None	No change
		Regeneration and consolidation of the historic centre to improve the retail and commercial functions of the town core, with enhanced permeability and sustainable mobility within the town centre and improve links between the core and surrounding residential and employment areas through the further development of walking and cycling routes and improved public transport	As per previous assessment and mitigation proposed in the SEA ER, NIR and FRA for Naas. With regard to walking and cycleway links, which are positive overall, the following is also noted for Naas in relation to flooding in general, and particularly if the canal is considered as part of sustainable modes: It should be noted that as acknowledged in the FRMP there is high uncertainty regarding the flood risk in relation to Naas due to poor availability of model calibration events and possible interconnection between fluvial and surface water drainage and canal systems. Prior to the development of this model a cautionary approach should be taken with regards to flood risk and zoning in Naas.	None	No change
		Strengthen the local employment base through the development of MERITS, Millennium Park in the North West Quadrant and the regeneration of underutilised lands including industrial lands in the north east of the town	As per previous assessment and mitigation proposed in the SEA ER, NIR and FRA with particular regard to the FRA which notes that industrial zone areas on the outskirts of the town also fall within Flood Zones A and B.	Strengthen the local employment base including through the development of MERITS, Millennium Park in the North West Quadrant and the regeneration of underutilised lands including industrial lands in the north east of the town.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

REPORT

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		Support the delivery of a dedicated public transport interchange in Naas with associated Park and Ride	As no specific location is outlined, the siting of such an interchange should be based on appropriate site/route selection and any environmental assessments as appropriate, given that three 'branches' of the River Boyne and River Blackwater SAC/SPA are within the town centre, and the potential issues with flooding and land use zoning constrained by such. The environmental sensitivities of the area should be duly noted in the RSES to ensure that future site selection has proper regard to protection of the environment.	Support the delivery of <b>new and enhanced</b> public transport infrastructure in Naas <b>and Sallins</b> , including Park and Ride and <b>interchange facilities as identified by the NTA and Kildare County Council</b> .	Broadening of the policy is noted to refer to new and enhanced infrastructure including in Sallins. Reference is also made to interchange facilities as identified by the NTA and Kildare County Council. It is not clear from the wording if these interchange facilities have been identified already and if so the degree to which they have considered likely significant effects on a European site. the assessment of the proposed amendment is again relevant in this case and the commitments of RPO 3.2 is relevant.
		Support an enhanced role and function of Naas as the County town of Kildare, particularly as a hub for high quality employment, residential and amenities.	As per the assessment in the SEA, AA, with particular regard to the FRA which notes that Flood Zones indicate that areas of the town centre and existing residential areas adjacent the Blessington and Dublin Road are at risk from flooding. The flood zones and constraints of the M7 motorway also indicate that Naas can expand predominantly to the south west.	None	No change
4.35	Support an enhanced role and function of Wicklow-Rathnew as the County town, particularly as a hub for employment, training and education.	None	No change	None	No change
4.36	Support Wickow-Rathnew's role in the provision of third level education in association with Institute of Technology Carlow.	Support Wickow-Rathnew's role in the provision of third level education at the Wicklow County Campus Rathnew (in association with Institute of Technology Carlow) and in particular, to support the development of the campus as a hub for the Film Industry and Screen Content Creation Sector	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.		
		To support ongoing investment in rail infrastructure to ensure its continued renewal, maintenance and improvement to a high level to ensure high quality of frequency, safety, service, accessibility and connectivity.	A positive addition with direct and indirect long-term positive impacts for MA and PHH, as well as AQ and CF via access to a high quality train service as an alternate mode to private vehicle. All investment should be subject to the outcome of appropriate planning and environmental assessments.	None	No change
		Support the plan-led development and regeneration of publicly owned land banks in the town for residential, employment, education, community, cultural and recreational opportunities and the consolidation of the town centre and the enhancement and linking of Brownfield and outlying sites to the town centre, with a focus on the regeneration of underused buildings and strategic site	As per previous assessment and mitigation proposed in the SEA ER, NIR and FRA for Longford.  The reference to 'outlying sites to the town centre' is ambiguous in terms of specific locations, so it is highlighted that there are extensive floodplains adjacent to the north-east and western edges of the town.  With the inclusion of reference to enhancement and linking of brownfield, the following is thus noted in the SEA for the NPF: Where infill and brownfield sites are utilised this is positive for PHH and MA but has the potential to negatively impact S as sites can have hazardous materials which require remediation. Disturbance of contaminated material may lead to mobilisation of leachates with consequent negative impacts for water, soils and indirectly for BFF. There is also potential for further negative impacts on BFF due to possible spread of Invasive Species. It has been noted in the baseline section that there is only one landfill in Ireland with the ability	None	No change

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			<p>to process mildly contaminated inert materials. This has implications for the levels of contaminated waste which could be generated through the use of infill and brownfield sites for provision of housing, particularly in urban areas where there have been historic industry uses or old dumping sites.</p> <p>Furthermore the following mitigation was proposed in the NPF for NPO3c: A map is to be developed by each local authority, coordinated at the Regional Assembly level, showing potential infill and brownfield opportunities in order to spatially inform decision making on the suitability of these sites for further development or regeneration.</p> <p>At the time of finalisation of the NPF, the DHPLG indicated that this mitigation measure would be addressed through the RSES. It is acknowledged that a new guiding principal has been added [amendment 120] which addresses this requirement.</p>		
		Support Longford Town as a strategic portal to the northwest and south in recognition of its location at the junction of the N55; 'M4 /N4 Dublin/Sligo' and N5; and due to its proximity to the regional growth centre of Athlone.	As per previous assessment and mitigation proposed in the SEA ER, NIR and FRA for Longford.	Support Longford Town as a strategic portal to the northwest and south in recognition of its location at the junction of the N55; M4/N4 Dublin/Sligo and N5; due to its proximity to the regional growth centre of Athlone; <b>and support its role as a strategic employment centre.</b>	As per previous assessment and mitigation proposed in the SEA ER, NIR and FRA for Longford.
		To ensure that the future strategic development of Longford takes account of the close proximity of sites of international nature conservation interest	While the specific inclusion of this policy is to be welcomed, it could be further strengthened by including a commitment to ensure development does not prevent achievement of objectives set for sites of national and international nature conservation interest.	Omitted	The reference to ... <i>the close proximity of sites of international nature conservation interest has been removed.</i> It is acknowledged that an additional text has been added to RPO 3.2 above to ensure an overall general objective is presented early in the RSES, applicable to all locations which takes account of the proximity of sites of international nature conservation interests. For this reason, no additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
4.44	Promote the plan led development and regeneration of publicly owned land banks in the town for employment, education, community, cultural and recreational opportunities.	Promote the plan led development and regeneration of publicly owned land banks in the town for employment, education, community, cultural and recreational opportunities and to support the economic development and regeneration of the town centre	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
4.45	Support the development and expansion of the Midlands Regional Hospital	Support the development and expansion of the Midlands Regional Hospital including any necessary supporting infrastructure	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		Support Mullingar's role as an important employment hub by promoting economic development and clustering of related enterprises	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		To ensure that the future strategic development of Mullingar takes account of the close proximity of sites of international nature conservation interest	While this policy is welcomed, it needs to be further strengthened beyond "take account of". Future strategic development in Mullingar should progress in a manner which does not prevent achievement of objectives set for sites of international nature conservation interest.	Omitted	The reference to ... <i>the close proximity of sites of international nature conservation interest has been removed.</i> It is acknowledged that an additional text has been added to RPO 3.2 above to ensure an overall general objective is presented early in the RSES, applicable to all locations which takes account of the proximity of

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					sites of international nature conservation interests. For this reason, no additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
4.46	Support Tullamore's role as a tourism hub having regard to its accessibility to key tourist destinations including proximity to natural amenities and recreational opportunities including Grand Canal Greenways and Blueways and outdoor recreation parks.	Support Tullamore's role as a tourism hub and development as a Tourism Destination Town having particular regard to its distilling heritage and industry, accessibility to key tourist destinations including proximity and accessibility to key tourist destinations, natural amenities and recreational opportunities including the Grand Canal Greenways and, Lough Boora Discovery Park, Slieve Bloom Mountains. Also to support Tullamore as a hub for the 'Midlands Cycle destination – Offaly'. Further, to recognise Tullamore's potential as a conferencing and event hub, given the town's central location, accessibility and experience	<p>The addition of other natural heritage areas as tourist destinations to increase accessibility to (Lough Boora, Slieve Bloom Mountains) has potential for negative effects on BFF, W, CH and LS through increased visitor pressure if not sustainably managed. However the positive impacts to PHH, AQ and CF from access to nature and cycleways are also recognised.</p> <p>As noted in the SEA assessment for greenways/blueways, opportunities to add positive impacts for BFF, W and LS should be considered as part of any cycleway development of linkage through inclusion of ecological enhancements. As the Slieve Bloom Mountains are an SAC and SPA, if it appears that any development arising from the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p> <p>Recommend using similar wording as included in amended RPO 6.16 i.e. "...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"</p>	None	No change
		Support the role of Tullamore as a major employment centre with key assets being its existing positive jobs to resident employees ratio, excellent quality of life and future strategic development sites. Also to support infrastructural development to facilitate this role.	As per previous assessment and mitigation proposed in the SEA ER, NIR and FRA for Tullamore. The provision of infrastructural development will be subject to the outcomes of the planning process and any related environmental assessments.	None	No change
		To support the examination of a University in the Midlands and in particular Tullamore's and Co. Offaly's role in its provision	Broadly positive for PHH but considerations should extend to indirect and cumulative impacts of direct infrastructure needed and supporting facilities e.g. housing needs etc. which could result in indirect and cumulative impacts to environmental receptors. This should be acknowledged.	To examine the need for complementary third level outreach educational facilities at Tullamore, particularly with regard to support for Tullamore Regional Hospital and where appropriate, its continued development as a Teaching/University Hospital, together with potential for linkages to existing and new med-tech businesses and research facilities.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
		Support the vision and objectives of the J17 National Enterprise Park Masterplan which aims to deliver a viable economic zone within Portlaoise which will accommodate a range of potential businesses and industries whilst having regard to spatial planning, infrastructural, environmental and transportation requirements and compatibility with adjoining land uses	<p>It is noted that the Masterplan is included as part of the Portlaoise LAP 2018-2024 which has undergone SEA, AA and SFRA. The SFRA for this RSES flags that there areas along the banks of each watercourse in the town that lie within Flood Zones A and B, including the National Enterprise Park.</p> <p>It is noted that the Masterplan does contain policies and objectives in respect of natural heritage and environmental protection.</p> <p>While inclusion of the wording "having regard to</p>	Support the vision and objectives of the J17 National Enterprise Park Masterplan, where appropriate, which aims to deliver a viable economic zone within Portlaoise which will accommodate a range of potential businesses and industries whilst having regard to spatial planning, infrastructural, environmental and transportation requirements and compatibility with adjoining land uses. This is subject to compliance with the requirements of the SEA, Habitats and Floods Directive.	The addition of subject to compliance with the requirements of the SEA, Habitats and Floods Directive is welcomed. For this reason, no additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

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			environmental requirements" can be seen as broadly positive for BFF, W, S, LS and CH, it is vague and lacks any specificity making it aspirational rather than action orientated. It is recommended that this policy is revised to commit to ensuring environmental protection.		
		Support the development and expansion of the Midlands Regional Hospital to be a centre of excellence for Portlaoise and its catchment area	Broadly positive indirect positive impacts for PHH and MA in the medium to long term.	Support the development and expansion of the Midlands Regional Hospital at Portlaoise and its catchment area.	As per previous assessment. No additional effects.
4.49	A cross-boundary Joint Urban Area Plan (UAP) shall be prepared for Carlow by Carlow County Council and Laois County Council having regard to its location within the combined functional area of both local authorities. The Joint UAP shall provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Carlow to ensure it achieves targeted compact growth of a minimum of 30% and ensure a co-ordinated approach is taken to the future growth and development of the town to ensure that it has the capacity to grow sustainably and secure investment as a Regional Growth Centre. The Joint UAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development. Regard shall be had to the respective housing, retail and other Local Authority strategies that may be in place.	A cross-boundary Joint Local Area Plan (LAP) shall be prepared for Carlow by Carlow County Council and Laois County Council having regard to its location within the combined functional area of both local authorities. The Joint UAP shall provide a coordinated planning framework to identify and deliver strategic sites and regeneration areas for the future physical, economic and social development of Carlow/Craiguecullen to ensure it achieves targeted compact growth of a minimum of 30% and ensure a co-ordinated approach is taken to the future growth and development of the combined urban area to ensure that it has the capacity to grow sustainably and secure investment as a Key Town. The Joint LAP shall identify a boundary for the plan area and strategic housing and employment development areas and infrastructure investment requirements to promote greater co-ordination and sequential delivery of serviced lands for development. Regard shall be had to the respective housing, retail and other Local Authority strategies that may be in place	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		Support development of underused lands along the River Barrow.	This policy has significant potential for direct and indirect negative environmental impacts, particularly for BFF, W, LS and LandS, and indirectly for PHH. While also being a designated SAC and SPA, the SEA ER and NIR assessments flag that the River Barrow has a WFD status of Moderate, while the Burren tributary is at Poor status, with both At Risk of not meeting WFD objectives. The Barrow is also a designated Nutrient Sensitive River from Portarlinton to Graiguenamanagh, and therefore has little to no assimilative capacity to absorb current wastewater or other development pressures.  The SFRA also flags that Any undeveloped sites adjacent to the River Barrow have been zoned for green space and this should be maintained to retain existing floodplain areas.  It is recommended that this policy is removed in light of the environmental sensitivities and in having regard to the recommended mitigation measures.	Support the sustainable development of environmentally sensitive, low intensity amenity development associated with the Barrow Blueway subject to compliance with the Habitats and Birds Directive and Floods Directive.	It is acknowledged that this RPO has been revised substantially to clarify the low intensity nature of the development envisaged and further clarifying that the support is subject to compliance with Habitats and Birds Directive and Floods Directive. This recognises the SEA/AA and FRA concerns about the significant sensitivities in the area. Any further development of this RPO would greatly benefit from further studies to inform the exact nature and intensity that could be accommodated without giving rise to adverse effects. This could be achieved through a coordinated management plan in collaboration between EMRA, the relevant LA, IFI and NPWS that could address the key issues of visitor pressure, supporting infrastructure pressure and management of the spread of invasive species.  The addition of ...subject to compliance with the requirements of the Habitats and Birds Directives and the Floods Directive is welcomed. For this reason, no additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

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4.50	In Development Plan Policy Local Authorities shall prioritise the regeneration of rural towns and villages through identification of significant ready-to-go regeneration projects for rural villages and rural areas which could harness untapped assets with community and wider private and public sector support and investment including the Rural Regeneration and Development Fund.	In Development Plan Policy Local Authorities shall prioritise the regeneration of rural towns and villages through identification of significant regeneration projects for rural villages and rural areas which could harness untapped assets with community and wider private and public sector support and investment including the Rural Regeneration and Development Fund.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
4.51	In Development Plan Policy Local Authorities shall identify small towns and villages that have the potential for services sites as an alternative to one-off rural housing.	Development Plans should support the development of a “New Homes in Small Towns and Villages” initiative which would augment the delivery of actions by Local Authorities, Irish Water, communities and other stakeholders in the provision of services and serviced sites to create “build your own home” opportunities within the existing footprint of rural settlements to provide new homes to meet housing demand.	The inclusion of this policy is considered positive overall for PHH and MA.	None	No change
4.52	Local Authorities shall identify and provide policies to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, and to protect the value and character of the open countryside.	Local Authorities shall identify and provide policies to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, and to protect the value and character of the open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, energy, tourism, forestry enterprise	It should be noted within this policy that it is subject to the outcomes of the planning process and any environmental assessments as appropriate. This is to recognise the potential for emerging sectors, such as agri-business, energy, tourism, forestry enterprise to give rise to direct and indirect negative impacts on PHH, W, S, LS, CG and BFF if they are promoted in inappropriate locations and without due regard for the sensitivities of the receiving environment.	Local Authorities shall identify and provide policies that recognise the contribution that small towns, villages and rural areas contribute to social and economic wellbeing. As part of this policy provision that seeks to support and protect existing rural economies such as valuable agricultural lands to ensure sustainable food supply, to protect the value and character of open countryside and to support the diversification of rural economies to create additional jobs and maximise opportunities in emerging sectors, such as agri-business, energy, tourism and forestry enterprise is supported.	As per assessment of amendments. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
		Support the consolidation of the town and village network to ensure that development proceeds sustainably and at an appropriate scale, level and pace in line with the Core Strategies of the County Development Plans	Positive direct and indirect effects from this policy as it seeks to deliver sustainable development in line with core strategies in CDP. It is noted that core strategies are or will be subject to AA, SEA and SFRA to inform the appropriate levels.	None	No change
		Support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas	This policy has potential to give rise to short to long term indirect negative effects on BFF, W, S etc through disturbance and intrusion from supporting infrastructure. All such initiatives should be subject to the outcomes of the planning process and any environmental assessments as appropriate.	Support the rural economy and initiatives in relation to diversification, agri business, rural tourism and renewable energy so as to sustain the employment opportunities in rural areas. In keeping with the NPF, the Eastern and Midland Regional Assembly will support the longer term strategic planning for industrial peatland areas. This may include support, where appropriate, for a Transition Team in place and preparation of a comprehensive afteruse framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues, including employment and replacement enterprise reflecting the current transition from employment based around peat extraction.	This proposed amendments specifically relate to future uses of industrial peatland areas. Future use of industrial peatlands can include development of wind farms/parks, biomass growth etc. and as such have the potential for significant negative impacts to PHH, BFF, W, LS, LandS and CF despite the focus being on renewables. Without sensitive consideration of what is appropriate for any given site the benefits of renewables development may be offset by other negative effects on the receiving environment. With this in mind, the inclusion of a commitment to prepare a comprehensive after use framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues is welcomed and is considered the most appropriate next step to ensure that environmental consequences can be properly analysed with a view to avoiding adverse effects on the receiving environment. This plan must be subject to SEA and AA in keeping with the National Peatlands Strategy which states that potential economic, environmental and social benefits and costs of peatland uses to be considered and applied to

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					policy and land use decisions. This is underpinned by RPO 3.2.
<b>Ch 5</b>	<b>Dublin MASP - 8 RPOs</b>				
5.4	Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'[1], 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines[2], and Draft 'Urban Development and Building Heights Guidelines for Planning Authorities'.	Future development of strategic residential development areas within the Dublin Metropolitan area shall provide for higher densities and qualitative standards as set out in the 'Sustainable Residential Development in Urban Areas'[1], 'Sustainable Urban Housing; Design Standards for New Apartments' Guidelines[2], and 'Urban Development and Building Heights Guidelines for Planning Authorities'.	No change. Amendment acknowledges that the Building Height Guidelines have been finalised. It is noted that the mitigation measures provided in the SEA ER and NIS for the building height guidelines should be fully implemented.	None	No change
5.5	Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, supported by the development of Key Metropolitan Towns in a sequential manner as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.	Future residential development in the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns <del>as in a sequential manner</del> set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.	Deletion of duplicate reference to sequential approach. No additional likely significant effects in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	Future residential development <b>supporting the right housing and tenure mix</b> within the Dublin Metropolitan Area shall follow a clear sequential approach, with a primary focus on the consolidation of Dublin and suburbs, and the development of Key Metropolitan Towns, as set out in the Metropolitan Area Strategic Plan (MASP) and in line with the overall Settlement Strategy for the RSES. Identification of suitable residential development sites shall be supported by a quality site selection process that addresses environmental concerns.	No additional likely significant effects in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
5.7	Coordinate across Local Authority boundaries to identify manage and develop regional green infrastructure to enhance strategic connections and develop a regional greenbelt policy in the Dublin metropolitan area.	Coordinate across Local Authority boundaries to identify manage, develop and protect regional green infrastructure to enhance strategic connections and develop a Green Infrastructure policy in the Dublin Metropolitan Area.	Positive additions with potential for enhanced positive effects for BFF, W, S, PHH, AQ, CF and MA in particular if sited sensitively and having regard to sensitive receptors. It is acknowledged that there is potential for cumulative negative effects from GI provision where siting and routing is in conflict with existing nature conservation areas. As such, the policy to follow must ensure that potential for habitat loss and disturbance is addressed at the regional level also.	None	No change
<b>Ch 6</b>	<b>Economy and Employment</b>				
6.1	Support the national economic agencies, Local Enterprises Offices, Regional Action Plan for Jobs implementation committees and Local Authorities with their plans for job creation with an emphasis on: a) an enterprise base with increased productivity and more diversification –including diversification of their markets - with high levels of innovation, skills adaptability, and relatively low costs of doing businesses b) maintaining full-employment with unemployment rates of each Strategic Planning Area not exceeding the State average by more than one percentage point c) applying the guiding principles for strategic employment and investment prioritisation in placemaking for enterprise development presented in this draft RSES.	Support the national economic agencies, Local Enterprises Offices, Regional Enterprise Plan Steering Committees, Local Authorities and other relevant stakeholders, with their plans for job creation and enterprise development with an emphasis on: a) an enterprise base with increased productivity and more diversification –including diversification of their markets - with high levels of innovation, skills adaptability, and relatively low costs of doing businesses b) maintaining full-employment with unemployment rates of each Strategic Planning Area not exceeding the State average by more than one percentage point c) applying the guiding principles for strategic employment and investment prioritisation in placemaking for enterprise development presented in this draft RSES.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change

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6.8	Support Local Authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.	Support Local Authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy, tourism, quarrying and mining and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.	A number of sectors were previously outlined in this RPO and the amendment adds specifically tourism and quarrying/ mining. Development of any of these sectors could have positive and negative direct and indirect impacts on BFF, W, LS, CH, AQ, CF and LandS through disturbance to or loss of habitats and/or species, emissions to air and water, disturbance to heritage features, loss of floodplains or impacts to landscape character/setting. It is noted that policy objective relates to development in a sustainable manner "noting the importance of maintaining and protecting the natural landscape and built heritage". As a result many of the environmental receptors for this policy objective for the natural environment are positive. In developing such initiatives, each LA must consider the potential for the initiative to lead to likely significant effects on any European site and where necessary adverse effects on site integrity.	Support Local Authorities to develop sustainable and economically efficient rural economies through initiatives to enhance sectors such as agricultural and food, forestry, fishing and aquaculture, energy and extractive industries, the bio-economy, tourism, <del>quarrying and mining</del> and diversification into alternative on-farm and off-farm activities, while at the same time noting the importance of maintaining and protecting the natural landscape and built heritage.	Deletion noted. No additional likely significant effects in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
		<p>The Regional Assembly supports the Regional Enterprise Strategies to focus on;</p> <ul style="list-style-type: none"> <li>• Position and support the growth of the Midlands as an advanced manufacturing centre of excellence.</li> <li>• Leverage opportunities in big data and data analytics from iLOFAR.</li> <li>• Ensure that the Midlands is well positioned to address the challenges posed by the transition to a low carbon economy and renewable energy</li> </ul> <p>Increase enterprise engagement in innovation, research and development to ensure Dublin's continued competitiveness and productivity.</p> <ul style="list-style-type: none"> <li>• Build a pipeline of sustainable and scalable start-ups in Dublin and provide quality support</li> <li>• Develop the Mid-East as a hub for the Screen Content Creation Sector</li> <li>• Build an ecosystem framework to support the Agri-food sector in the Mid-East</li> <li>• Develop a network of innovative co-working spaces in the region to mitigate long commuting times, promote remote working opportunities and life-style benefits.</li> </ul>	<p>The purpose of the Enterprise strategies is to drive job creation and support enterprise growth in the region. No specific projects are noted in the RPO but it can be anticipated from the content of the RPO that infrastructure and support services are intended. This has the potential to impact negatively on the receiving environment including BFF, W, S, L, LS, CH as a result of construction and operation. Benefits are also likely for A and CF where reduced community and energy efficiency in buildings can be achieved. Mitigation already included in the SEA and NIR for the RSES are applicable here including:</p> <p>Any plan or project arising from the RSES will be subject to SEA, AA, EIA and EclA as appropriate as the main tools to ensure future growth and development while maintaining a high quality environment; developments will be phased in line with adequate services, particularly with regard to water and wastewater capacity; and robust site and route selection will be used to avoid unnecessary impact.</p>	<p>The Regional Assembly supports the Regional Enterprise Strategies to focus on; <b>Support a high level of economic success throughout the region by building on local strengths and regional innovation capacity</b> - Position and support the growth of the Midlands as an advanced manufacturing centre of excellence. - Leverage opportunities in big data and data analytics from iLOFAR. - Ensure that the Midlands is well positioned to address the challenges posed by the transition to a low carbon economy and renewable energy</p> <p>Increase enterprise engagement in innovation, research and development to ensure Dublin's continued competitiveness and productivity. - Build a pipeline of sustainable and scalable start-ups in Dublin and provide quality support - Develop the Mid-East as a hub for the Screen Content Creation Sector - Build an ecosystem framework <b>to support the financial services, payments and Agri-food sectors throughout the Region</b> - Develop a network of innovative co-working spaces in the region to mitigate long commuting times, promote remote working opportunities and life-style benefits</p>	No additional likely significant effects in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
		To support the sustainable development of tourism in the Midlands in line with the strategic objectives of both the Ireland's Ancient East and Ireland's Hidden Heartlands experience brand propositions	<p>Direct positive impacts for PHH and MA from increased tourism opportunities in the medium to long term. However such initiatives can give rise to significant negative effects over the short to longer term for CH, BFF, W, LandS as a result of increased visitor pressures leading to degradation of environmental receptors from trampling, insufficient water / wastewater capacity during high seasons, litter, increased seasonal air pollution from transport etc..</p> <p>As with the WAW initiative, the proposals for the Ancient East and Hidden Heartland should be subject to their own SEA and AA process to ensure the carrying capacity of the receiving environment is aligned and limited to sustainable patterns. Lessons-learned and the</p>	To support the sustainable development of tourism in the Region <del>in the Midlands</del> in line with the strategic objectives of both the Ireland's Ancient East and Ireland's Hidden Heartlands experience brand propositions.	Deletion noted. No additional likely significant effects in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

REPORT

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			evidence base will already exist along with ongoing monitoring associated with the WAW, and these learnings should be noted in the RPO.		
6.15	Support working with relevant landowners and recreational/ tourism agencies to increase access to the countryside and coastal areas to ensure maintenance of the existing network.	Support working with relevant landowners and recreational/ tourism agencies to increase access to the countryside and coastal areas to ensure maintenance of the existing network and to seek to develop and add to the offer where appropriate	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
6.16	Support the maintenance of, and enhanced access to, state lands such as National Parks, Forest Parks, Waterways, etc for recreation and tourism purposes.	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 manner that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism	Positive addition to the policy is noted and welcomed. As per previous assessment and mitigation proposed in the SEA ER and NIR.	Support the maintenance of, and enhanced access to <b>state and semi-state</b> 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 <b>in a sustainable manner</b> that protects environmental sensitivities, ecological corridors, and the ability of local infrastructure to support increased tourism.	As per previous assessment and mitigation proposed in the SEA ER and NIR.
		Support the local strategies which are already in place to link the River Shannon Blueway, the Royal and Grand Canal Greenways and the proposed Barrow Blueway right across the Midlands, incorporating the towns of Longford, Athlone, Mullingar, Tullamore and Portarlington	Provision of greenways and blueways may be indirectly negative for BFF; key issues for European Sites include the provision of support infrastructure such as slipways and quays, water pollution from fuel from boats, noise disturbance from power boats, human disturbance from increased footfall on adjacent towpaths and people using the water, loss or disturbance of riverine or fringing habitat to provide associated infrastructure. In addition there is potential for transfer of disease and spread of invasive species as a result of boating activity. A recent example is the introduction of crayfish plague in the River Barrow system. This can result in 100% mortality for the protected white clawed crayfish. The policy base should include a clear objective to prevent the spread of IAS within the region. Opportunities to add positive impacts for BFF, W and LS should be considered as part of any blue/greenway through inclusion of ecological enhancements to the developments. The objective should have regard to the required conservation objectives of European sites, other nature conservation sites, ecological networks, and protected species.	As per previous assessment and mitigation proposed in the SEA ER and NIR.	
		Support Offaly County Council, Bord na Mona and Coillte in the development of the 'Midlands Cycling Destination – Offaly'	Potential for medium to long-term direct positive impacts in AQ, CF, PHH and indirect positive impacts on MA. However, as above, cycleways have the potential for direct and indirect negative impacts on BFF in particular as a result of habitat loss and disturbance from routing and species disturbance and / or loss as a result of disturbance from cyclists and associated parking and service facilities that may be required. A robust feasibility study and route selection is therefore needed to ensure that this RPO does not give rise to negative effects on BFF and W and does not lead to likely significant effects on any European sites or protected species. It is recommended that this RPO includes	None	No change

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			reference to a feasibility study and a route selection.		
6.18	EMRA will work with Local Authorities and Fáilte Ireland to identify Destination Towns within the Region for the prioritisation of investment and supports to drive tourism growth in the Region.	EMRA will work with Local Authorities and Fáilte Ireland to identify a network of destination towns within the Region for the prioritisation of investment and supports to drive tourism growth in the Region, to spread the benefit of tourism throughout the region and to encourage the increase of tourism product development	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		Support the Departments of Agriculture, Food and the Marine, and Communications Climate Action and Environment to enhance the competitiveness of the agriculture sector with an urgent need for mitigation as well as adaptation measures	The support for the DAFM and DCCAE in relation to enhancing the agri-sector will give rise to indirect positive impacts for PHH and MA. The recognition of the need to urgently address climate mitigation and adaptation in this regard is noted, however the RPO could benefit from prioritising support for real and effective mitigation and adaptation mechanisms for the long-term sustainability of the agri-sector.	Support the Departments of Agriculture, Food and the Marine, and Communications Climate Action and Environment to enhance the competitiveness of the agriculture sector with an urgent need for mitigation as well as <b>real and effective and adaptation mechanisms for the long-term sustainability of the agri-sector.</b>	As per previous assessment. No additional effects from proposed amendment.
6.21	Support RAPJs, LEOs and Local Authorities to collaborate with the Regional Skills Fora managers, Education and Training Boards and local stakeholders to address skills shortages and lifelong learning challenges in the Region.	None	No change	None	No change
6.22	Support and foster the collaboration of industry and research to identify areas of research, development and innovation, and to identify projects for funding.	None	No change	None	No change
		Support community and adult education providers who are already providing formal and non-formal education to targeted disadvantaged groups and who have already identified the barriers to participation in lifelong learning, such as childcare, transport and rural isolation to increase participation rates and support progression into further education and employment	Direct and indirect positive impacts in the short, medium and long term for PHH and MA in particular.	None	No change
6.28	EMRA will support the construction of a regional brand that is consistent with, and complementary to, current local and national branding, to promote the Region domestically and abroad.	None	No change	None	No change
		Support Local Authorities in the design, development and roll-out of social enterprise practices, with a strong emphasis on collaboration	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
6.32	Support enterprise agencies, RAPJs, LECPs, Regional Skill fora and local stakeholders on their introduction of contingency plans and pilot projects based on the strengths of the Region to counteract the effects from industrial decline and potential external shocks in the Region. This may include lifelong learning programmes, appropriate business supports and upskilling to facilitate moving to alternative sectors in the locality or region.	Support enterprise agencies, RAPJs, LECPs, Regional Skill fora and local stakeholders on their introduction of contingency plans and pilot projects based on the strengths of the Region to counteract the effects from industrial decline and potential external shocks in the Region. This may include lifelong learning programmes, appropriate business supports and upskilling to facilitate moving to alternative sectors in the locality or region.	The inclusion of the Regional Transition Team is positive will be a long-term direct positive impact for PHH, as it supports opportunities and economic mitigation resulting from planned job losses at Bord na Móna.	Support enterprise agencies, RAPJs, LECPs, Regional Skill fora and local stakeholders on their introduction of contingency plans and pilot projects based on the strengths of the Region to counteract the effects from industrial decline and potential external shocks in the Region. This may include lifelong learning programmes, appropriate business supports and upskilling to facilitate moving to alternative sectors in the locality or region, <b>for example the Bord na Mona Regional Transition Team for a comprehensive after use framework plan for the peatlands.</b>	Amendment is an example provided for clarity. No additional impacts.
<b>Ch 7</b>	<b>Environment and Climate</b>				
7.5	EMRA shall work with coastal stakeholders to support the sustainable development of the	EMRA shall work with coastal stakeholders to support the sustainable development of the	No additional likely significant effects (either positive or negative) in respect of the	None	No change

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	national Fishery Harbour Centre in Howth and the sustainable growth of the seafood sector in the Region, to ensure that marine resources are sustainably managed and that planned activities on land do not adversely affect the marine economy and environment.	national Fishery Harbour Centre in Howth and the sustainable growth of the seafood and on-shore aquaculture sector in the Region, and to ensure that marine resources are sustainably managed and that planned activities on land do not adversely affect the marine economy and environment.	SEA/AA/FRA from this proposed alteration to the draft plan.		
7.10	Support the implementation of the Water Framework Directive in achieving and maintaining at least good environmental status for all water bodies in the Region and to ensure alignment between the core objectives of the Water Framework Directive and other relevant Directives, River Basin Management plans and Local Authority Development Plans.	Support the implementation of the Water Framework Directive in achieving and maintaining at least good environmental status for all water bodies in the Region and to ensure alignment between the core objectives of the Water Framework Directive and other relevant Directives, River Basin Management plans and Local Authority land use Plans.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
7.11	Local Authorities shall incorporate into the development of local planning policy and decision making any measures for the continued protection of areas with high ecological status in the Region and for mitigation of threats to waterbodies identified as 'At Risk' as part of a catchment-based approach in consultation with the relevant agencies. This shall include recognition of the need to deliver efficient wastewater facilities with sufficient capacity and thus contribute to improved water quality in the Region.	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	It should be noted that a significant proportion of water bodies are under the risk category of Review, such that while many of these water bodies may currently have Good status, there are pressures which may or are likely to cause a deterioration in the future should trends not stabilise or reverse, or are awaiting the outcomes of measures which have already been applied. While it is a positive and welcome addition to highlight the need to protect our High status water bodies, it is just as important to maintain and prevent the deterioration of those water bodies under Review.  No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
7.18	Work with local authorities and state agencies to promote the development of improved visitor experiences and facilities in the Wicklow National Park	Work with local authorities and state agencies to promote the development of all aspects of park management in the Wicklow National Park and the Slieve Bloom Mountains.	The addition of Slieve Bloom Mountains is noted, however unlike the Wicklow Mountains, this park/Nature Reserve has no Park Management Plan. It would be a positive policy addition to, in order to promote all aspects of park management, to specifically also support the development of a Management Plan for Slieve Bloom, and an update to the Wicklow Mountains Management Plan which is out of date (2005-2009). This would assist in formalising and capturing the key issues and visitor pressures, and which highlights clear lines of responsibility, outlines the protection objectives for the European Sites and protected habitats and species, and sets out how these may be managed synergistically with amenity and tourism.  No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
7.20	Promote the development of improved visitor experiences, nature conservation and sustainable development activities within the Dublin Bay Biosphere.	Promote the development of improved visitor experiences, nature conservation and sustainable development activities within the Dublin Bay Biosphere in cooperation with the Dublin Bay UNESCO Biosphere Partnership.	Positive clarification on cooperation. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change

REF.	Original Draft Text	Proposed Material Amendment	SEA / AA / FRA Assessment of Proposed Amendments to Draft RSES	Final RPO following Minor Non-Material Changes	SEA / AA / FRA Assessment of Proposed Amendments to Draft RSES
		Develop guidance for assessment of proposed land zonings in order to achieve appropriate riparian setback distances that support the attainment of high ecological status for water bodies, the conservation of biodiversity and good ecosystem health, and buffer zones from flood plains.	This new RPO will give rise to direct and indirect medium to long-term positive impacts for W and BFF in particular. Positive in terms of alignment with other related environmental legislation including Water Framework Directive, Habitats Directive and floods Directive. A reference to the forthcoming RBMP guidelines would be a positive addition to this RPO.  Further to consultation feedback it is also recommended that habitat mapping in the coastal zone is essential to ensuring the long term sustainable strategic development in the Dublin Metro area. A separate RPO should be included for coastal and marine waters.	Support the development of guidance for assessment of proposed land zonings in order to achieve appropriate riparian setback distances that support the attainment of high ecological status for water bodies, the conservation of biodiversity and good ecosystem health, and buffer zones from flood plains.	The change in language reflects that guidelines are in preparation by other sectors of government, notably DHPLG in relation to compliance in WFD. This is considered the most appropriate avenue to follow and as such develop has been amended to support for those forthcoming guidelines.
7.23	Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and /or linked with local Greenways and other cycling and walking infrastructure.	Promote the development of a sustainable Strategic Greenway Network of national and regional routes, with a number of high capacity flagship routes that can be extended and /or linked with local Greenways and other cycling and walking infrastructure, notwithstanding that capacity of a greenway is limited to what is ecologically sustainable.	As per assessment and mitigation in SEA ER and NIR. Positive clarification on carrying capacities is welcomed.	None	No change
7.27	Support collaboration between Local Authorities and relevant stakeholders and the development of partnership approaches to integrated peatland management that incorporate any relevant policies and strategies such as the Bord na Mona Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats.	Support collaboration between Local Authorities, the Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management that incorporate any relevant policies and strategies such as the Bord na Mona Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	Support collaboration between Local Authorities, the Bord na Mona Transition Team and relevant stakeholders and the development of partnership approaches to integrated peatland management for a just transition that incorporate any relevant policies and strategies such as the Bord na Mona Biodiversity Plan 2016-2021 and the national Climate Mitigation and Adaptation Plans. This shall include support for the rehabilitation and/or re-wetting of suitable peatland habitats.	The reference to a “just transition” is noted. In keeping with commitments in chapter 4, there is a commitment to prepare a comprehensive after use framework plan for the peatlands and related infrastructure, which addresses environmental, economic and social issues is welcomed and is considered the most appropriate next step to ensure that environmental consequences can be properly analysed with a view to avoiding adverse effects on the receiving environment. This plan must be subject to SEA and AA in keeping with the National Peatlands Strategy which states that potential economic, environmental and social benefits and costs of peatland uses to be considered and applied to policy and land use decisions. This is underpinned by RPO 3.2.
7.29	Within one year of the publication of the RSES, the Climate Action Regional Office’s shall compile a greenhouse gas emissions inventory for the Region to allow for planning of strategic mitigation action through a Regional Decarbonisation Plan. The Climate Action Regional Office’s shall track the success of the Plan through annual inventories completed each year. Annual reporting of the inventories and critical analysis of the proposed measures will be undertaken to track progress within the Region and to track progress with national targets on a regional basis.	OMIT	The SEA recommends that this RPO is NOT omitted. Without generating an inventory in the first place it will not be possible to carry out the next RPO which is based on that inventory. If the CARO is not the correct owner of the action to generate the inventory, then the policy should be amended to clarify who and how it is to be generated.	Omit	With reference to RPO 7.30 and the amendments proposed it is accepted that this RPO can be omitted without adverse effects.
7.30	On publication of the first regional emission inventory, the EMRA in conjunction with the Climate Action Regional Office’s shall identify the sectoral emissions and assign a series of sectoral emissions reductions targets for each sector within the Regional Decarbonisation	On publication of the first regional emission inventory, the EMRA in conjunction with appropriate stakeholders shall identify the sectoral emissions and assign a series of sectoral emissions reductions targets for each sector within the Regional Decarbonisation	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	Within 1 year of carrying out a regional emissions assessment, EMRA shall compile and publish an emissions inventory and, in collaboration with the relevant Departments and agencies, agree emissions reductions targets in accordance with agreed national sectoral plans	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

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	Plan. These emissions reductions targets will be based on an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework.	Plan. These emissions reductions targets will be based on an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework.		and to support an aggregate 40% reduction in greenhouse gas emissions by 2030 in line with the EU 2030 Framework.	
7.31	Local Authorities shall develop, adopt and implement local climate action strategies which shall assess local vulnerability to climate risks, quantify the emissions produced within their jurisdictions, and identify, cost and prioritise adaptation actions in accordance with the guiding principles of the National Adaptation Framework.	With the assistance and support of the Climate Action Regional Offices, Local Authorities shall develop, adopt and implement local climate adaptation and mitigation strategies which shall address issues including local vulnerability to climate risks and identify and prioritise actions, in accordance with the guiding principles of the National Adaptation Framework, National Mitigation Plan.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
7.32	Climate regional action offices shall provide guidelines and support to the Local Authorities on the development, adoption and implementation of local climate action strategies (both mitigation and adaptation). These guidelines shall include the specific actions and obligations and timescales for same that must be undertaken by the Local Authorities to comply with national policy.	Climate regional action offices shall provide support to the Local Authorities on the development, adoption and implementation of local climate action strategies (which can address both adaptation and mitigation). Ongoing support should relate to the specific actions, and obligations and timescales for same that must be undertaken by the Local Authorities in accordance with local climate change adaptation strategies and compliance with national policy.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
7.34	EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy should be developed to support delivery of projects within the Strategic Energy Zones.	EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy should be developed to support delivery of projects within the Strategic Energy Zones.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	EMRA shall, in conjunction with Local Authorities in the Region, identify Strategic Energy Zones as areas suitable for larger energy generating projects, the role of community and micro energy production in urban and rural settings and the potential for renewable energy within industrial areas. The Strategic Energy Zones for the Region will ensure all environmental constraints are addressed in the analysis. A regional landscape strategy <b>could</b> be developed to support delivery of projects within the Strategic Energy Zones.	The lack of a landscape strategy will continue to be an issue for delivery of energy projects into the future. The dilution of the commitment is considered unnecessary. The commitment in RPO 7.25 is noted however.
		That the RSES prepare policies/ objectives that anticipate the identification of "Projected Climate Impact Areas"	The RPO would benefit from greater clarity on the scope and function intended. It is not clear if it is intended that the RSES will include such policies or if the intention is for the EMRA to prepare them in due course.	Rejected. Having regard to a changing policy context and in recognition that there is no established methodology for the identification and mapping of 'Projected Climate Impact Areas', EMRA are currently unable to provide sufficient clarity on the scope and function in this area to warrant an RPO in the strategy. It is considered important, however, that reference be made in the narrative that EMRA will support possible forthcoming projects and related mapping in this area which, when developed, will provide a useful tool to inform future land use plans and policy.	No likely significant effects.
<b>Ch 8</b>	<b>Connectivity</b>				
8.1	The integration of transport and land use planning in the Region shall be informed by the guiding principles expressed in the transport strategy of the draft RSES.	The integration of transport and land use planning in the Region shall be consistent with the guiding principles expressed in the transport strategy of the draft RSES.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
8.4	Land use plans within the GDA shall demonstrate a consistency with the NTA's Transport Strategy for the Greater Dublin Area and plans outside of the GDA shall be informed by the guiding principles expressed in the draft RSES.	Land use plans within the GDA shall demonstrate a consistency with the NTA's Transport Strategy for the Greater Dublin Area and plans with or outside of the GDA shall be consistent with the guiding principles expressed in the draft RSES.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change

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		To promote the use of mobility management and travel plans to bring about behaviour change and more sustainable transport use.	This is a positive and welcome policy inclusion which should have direct and indirect positive medium to long-term impacts on PHH, as well as AQ and CF to address the behavioural aspects of modal choice.	None	No change
		To prepare a regional strategy for freight transport in collaboration with the relevant transport agencies and the other Assemblies	This is a positive policy addition with positive impacts mainly for MA, particularly if all modal options are considered and promoted. Such a strategy should undergo SEA and AA to ensure that strategies are guided toward sustainable outcomes in the long-terms and avoid unnecessary impacts on the receiving environment.	To support the preparation of a regional strategy for freight transport in collaboration with the relevant transport agencies and the other Assemblies.	Amendment reflects that EMRA will not be the one to prepare such a strategy. Need for SEA and AA remains.
8.15	Support the National Aviation Strategy and the growth of Dublin Airport to include its status as a secondary hub airport, in particular the provision of a second runway and improved terminal facilities. Improved access to Dublin Airport is supported, including MetroLink and improved bus services as part of BusConnects, connections from the road network from the west and north and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification.	Support the National Aviation Policy for Ireland and the growth of movements and passengers at Dublin Airport to include its status as a secondary hub airport. In particular, support the provision of a second runway, improved terminal facilities and other infrastructure.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
8.16	Improve cycle access to Dublin Airport and surrounding employment locations.	Improved access to Dublin Airport is supported, including Metrolink and improved bus services as part of BusConnects, connections from the road network from the west and north and in the longer term, consideration of heavy rail access to facilitate direct services from the national rail network in the context of potential future electrification. Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of car parking and car hire parking.	This RPO is significantly broadened in scope from cycle access. Reference is now included to Metrolink, BusConnects, rail and car including parking. This access has the potential for significant cumulative impacts in and around Dublin airport with direct and indirect negative impacts from landuse change, land loss, habitat loss, emissions to water and air, changes to surface water regimes, changes to flooding, increase noise among others. An integrated plan, prioritising public transport offers the best potential to reduce negative effects. It is therefore recommended that a mobility management plan be developed for Dublin Airport as part of the Dublin Airport LAP or similar process in cooperation with daa, Fingal CC and the relevant transport agencies to ensure that the short, medium and long-term needs of the transport network in the area are not compromised. Such a plan should clearly show how growth of the airport and associated developments such as Airport City which predict significant additional demand are to be sustainably accommodated in the existing and permitted transport capacity while also protecting the receiving environment.	Improved access to Dublin Airport is supported, including Metrolink and improved bus services as part of BusConnects, connections from the road network from the west and north <del>and in the longer term</del> . Improve cycle access to Dublin Airport and surrounding employment locations. Support appropriate levels of car parking and car hire parking.	Removal of timeline will not result in additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
8.17	Spatial planning policies in the vicinity of the airport shall recognise and reflect the airport noise zones associated with Dublin Airport. In particular within the Inner Airport Noise Zone provision of new residential and/or other noise sensitive development shall be actively resisted. Within the outer noise zone provision of new residential and/or other noise sensitive development shall be strictly controlled.	Spatial planning policies in the vicinity of the airport shall recognise and reflect the airport noise zones associated with Dublin Airport. In particular within the Inner Airport Noise Zone provision of new residential and/or other noise sensitive development shall be actively resisted. Within the outer noise zone provision of new residential and/or other noise sensitive development shall be strictly controlled and require appropriate levels of noise insulation in all cases.	Medium to long term positive impacts for PHH and MA by the inclusion of noise considerations as part of developments.	Spatial planning policies in the vicinity of the airport shall <b>protect the operation of Dublin Airport in respect to its growth and the safe navigation of aircraft from non-compatible land uses</b> . Policies shall recognise and reflect the airport noise zones associated with Dublin Airport. Within the Inner Airport Noise Zone, provision of new residential and/or other noise sensitive development shall be actively resisted. Within the Outer Noise Zone, provision of new residential and/or other noise sensitive	Additional wording in respect of growth and safe navigation at the airport are overall positive for MA and PHH. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

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				development shall be strictly controlled and require appropriate levels of noise insulation in all cases.	
<b>Ch 9</b>	<b>Quality of Life</b>				
9.12	Local Authorities shall, in their Core Strategies, set out specific objectives relating to the delivery of development on urban/brownfield regeneration sites in line with the Guiding Principles set out in the Draft RSES.	Local Authorities shall, in their Core Strategies, identify regeneration areas within existing urban settlements and set out specific objectives relating to the delivery of development on urban infill and brownfield regeneration sites in line with the Guiding Principles set out in the RSES and to provide for increased densities as set out in the 'Sustainable Residential Development in Urban Areas', 'Sustainable Urban Housing; Design Standards for New Apartment's Guidelines, and the 'Urban Development and Building Heights Guidelines for Planning Authorities.	Amendment acknowledges that the Building Height Guidelines have been finalised. It is noted that the mitigation measures provided in the SEA ER and NIS for the building height guidelines should be fully implemented.	None	No change
9.14	Support the implementation of Local Authority Local Economic and Community Plans (LECPs) and through the use of spatial planning policies, to seek to reduce the number of people in or at risk of poverty and social exclusion in the Region.	Support the implementation of Local Authority Local Economic and Community Plans, in collaboration with Local and Economic Development Committees (LDCs) and through the use of spatial planning policies, to seek to reduce the number of people in or at risk of poverty and social exclusion in the Region.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
9.16	In areas where significant new housing is proposed, an assessment of need regarding schools provision should be carried out and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations.	In areas where significant new housing is proposed, an assessment of need regarding schools provision should be carried out in collaboration with the Department of Education and Skills and statutory plans shall designate new school sites at accessible, pedestrian, cycle and public transport friendly locations.	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		To support the role of Higher Education Institutions and Educational Training Boards in addressing skills shortages and life-long learning needs in the region, and to support the further development of multi-campus Technological Universities to drive research and innovation.	A positive and welcome policy addition with medium to long-term positive impacts for PHH and neutral for other environmental receptors as it addresses skills and education.	None	No change
		In planning for the creation of healthy and attractive places, there is a need to provide alternatives to the car and to prioritise and promote cycling and walking in the design of streets and public spaces. Local authorities shall have regard to the Guiding Principles for 'Healthy Placemaking' and 'Integration of Land Use and Transport' as set out in the RSES and to national policy as set out in 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)	Overall a positive and welcome policy addition as it seeks to prioritise and promote walking and cycling, and therefore has positive direct and indirect impacts for PHH, MA, AQ, and longer-term for CF. Potential for biodiversity enhancements should also be explored.	None	No change
		To support Local Authorities in the development of regional scale Open Space and Recreational facilities particularly those close to large or growing population centres in the region.	Policy is positive for PHH and MA, but has the potential for direct and indirect impacts on BFF, LS, W CH and LandS where greenfield or other natural spaces outside of settlement envelopes are utilised for amenity over spaces which are already in built-up areas. Development or services which are targeted to large open areas should seek to incorporate ecological improvements and to include protection and preservation of important ecological features and stepping stones such as treelines,	None	No change

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			hedgerows, ponds, riparian zones, wild meadows etc. in order to prevent habitat fragmentation, degradation, or loss of/disturbance to species (e.g. pollinators). Such large open spaces may also serve other important ecosystem functions such as drainage and natural flood protection. Many towns are also located in or adjacent to European and national sites. Such proposals should be subject to robust site selection and environmental assessments.		
		Support the sensitive reuse of protected structures	Generally positive with regards to use of existing building stock, and inclusion of 'sensitive reuse' is welcomed.	None	No change
<b>Ch 10</b>	<b>Infrastructure</b>				
10.9	EMRA supports the servicing of rural villages (serviced sites) to provide an alternative to one-off housing in the countryside.	EMRA supports the servicing of rural villages (serviced sites) to provide an alternative to one-off housing in the countryside in line with RPO 4.51	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	None	No change
		Work closely with Irish Water to revise the Draft Investment Plan (2020- 2024) and subsequent investment plans to align the supply of water services with the settlement strategy and objectives of the EMRA Regional Spatial and Economic Strategy.	Direct and indirect positive short, medium and long term impacts for BFF, W, PHH and MA which will come from alignment of settlement strategies with IW investment planning.	None	No change
		Delivery and phasing of services shall be subject to the required appraisal, planning and environmental assessment processes and shall avoid adverse impacts on the integrity of the Natura 2000 network.	Direct and indirect short, medium and long term positive impacts for BFF, W and S in particular.	None	No change
		Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Planning Authorities and demonstrate phased infrastructure led growth to meet demands on the water supply, suitability of new and/or existing drinking water sources (for example hydromorphological pressures) and prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.	Positive policy inclusion. A reference to the forthcoming RBMP guidelines would be a further positive addition to this RPO.	Local Authority Core Strategies shall demonstrate compliance with DHPLG Water Services Guidelines for Local Authorities and demonstrate phased infrastructure – led growth that is commensurate with the carrying capacity of water services and prevent adverse impacts the integrity of water dependent habitats and species within the Natura 2000 network.	Amended wording now makes references to the RBMP Guidelines and include specific reference to preventing adverse impacts to the Natura 200 network. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.
		Encourage the development of a new rural settlement investment approach, coordinating Irish Water, Local Authority, developer and community led solutions to ensuring that sustainable water services solutions are progressively implemented	Direct and indirect positive short, medium and long term impacts for BFF, W, PHH and MA which will come from alignment of settlement strategies with IW investment planning.	None	No change
		Local Authorities and Irish Water should work together to examine significant raw water sources which may be made redundant by the Water Supply Project for the Eastern and Midlands Region with a view to reserving and protecting them for future back up or 'windfall' type economic development opportunities where high water use is required	The environmental sensitivities of the proposed Water Supply Project for the Eastern and Midlands Region have been documented in the SEA and AA which were undertaken on the initial plan phase. The project is now moving through planning and more detailed survey and analysis will be undertaken to support the AA and EIA of the scheme. At present, the project does not have planning. As previously noted in the SEA process, alternative supplies should be investigated in the short to medium term to ensure that alternatives exist should difficulties be encountered with the main alternative.	None	No change
10.15	Support and facilitate the development of enhanced electricity and gas supplies, and	Support and facilitate the development of enhanced electricity and gas supplies, and	No additional likely significant effects (either positive or negative) in respect of the	None	No change

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	associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process.	associated networks, to serve the existing and future needs of the Region and facilitate new transmission infrastructure projects that might be brought forward in the lifetime of this Strategy including the delivery of the necessary integration of transmission network requirements to facilitate linkages of renewable energy proposals to the electricity and gas transmission grid in a sustainable and timely manner subject to appropriate environmental assessment and the planning process	SEA/AA/FRA from this proposed alteration to the draft plan.		
10.20	Development Plans shall identify how waste will be reduced, in line with the principles of the circular economy and how remaining quantum of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food	Development Plans shall identify how waste will be reduced, in line with the principles of the circular economy, facilitating the use of materials at their highest value for as long as possible and how remaining quantum of waste will be managed and shall promote the inclusion in developments of adequate and easily accessible storage space that supports the separate collection of dry recyclables and food and shall take account of the requirements of the Eastern-Midlands Region Waste Management Plan	Positive policy additions promoting long-lasting materials and welcomed inclusion of reference to the Eastern-Midlands RWMP. It is noted that the RWMP has undergone SEA and AA and mitigation measures were identified. These should be fully implemented as part of this policy.	None	No change
<b>Ch 11</b>	<b>All Island Cohesion</b>				
11.1	In co-operation with relevant departments in Northern Ireland, the Eastern and Midlands Regional Assembly will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning and related spheres.	In co-operation with relevant departments in Northern Ireland, the Eastern and Midlands Regional Assembly will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning, economic growth and related spheres.	No change	In co-operation with relevant departments in Northern Ireland, the Eastern and Midlands Regional Assembly, and where appropriate in association with the Northern and Western Regional Assembly, will support mutually beneficial policy development and activity in the areas of spatial and infrastructure planning, economic growth and related spheres.	No additional likely significant effects as a result of proposed amendment.

### 2.3 Assessment of Other Aspects of the RSES

REF.	Original Draft Text	Proposed Material Amendment	SEA / AA / FRA Assessment of Proposed Amendments to Draft RSES	Final RPO following Minor Non-Material Changes	SEA / AA / FRA Assessment of Proposed Amendments to Draft RSES
Ch 3	<b>Growth Strategy (5 RPOs)</b>				
	Amend Overview of Growth Strategy, to include additional bullet point	Support the transition to low carbon, climate resilient and environmentally sustainable region	Additional bullet point adds further focus to key environmental issues, already articulated throughout the process. Positive effects in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.		
	Amend Table 3.1 Asset Based Criteria Approach. Amend 'Natural Capital' text under 'As expressed in Settlement Strategy' column, to read as follows;	Integration of recommendations and proposed mitigation measures, arising from SEA/AA/FRA underpinned by a regional Green Infrastructure and ecosystem services approach.	Explicit reference to integration of recommendations and proposed mitigation measures from SEA/AA/FRA is positive. Positive effects in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.		
	New Growth Enablers for the Region, to read as follows;	<ol style="list-style-type: none"> <li>Promote <b>global connectivity and regional accessibility</b> as part of an integrated land use and transport strategy, with a focus on protecting national assets and enhanced inter-regional connectivity.</li> <li>Support the future success of <b>Dublin as Ireland's leading global city of scale</b> by better managing strategic assets to increase opportunity and sustain national economic growth and competitiveness.</li> <li>Deliver strategic development areas identified in the Dublin <b>Metropolitan Area Strategic Plan (MASP)</b> to ensure a steady supply of serviced development lands to support Dublin's sustainable growth</li> <li>Facilitate collaboration to support the development of the <b>Dublin-Belfast Economic Corridor</b>, to drive synergy in the Drogheda-Dundalk-Newry cross border network and strengthen economic links with the South East extending to Rosslare Europort</li> <li>Target significant growth in the <b>Regional Growth Centres</b> of Athlone, Drogheda and Dundalk to enable them to act as regional drivers, with a focus on improving local economies and quality of life to attract investment and the preparation of Urban Area Plans (UAPs).</li> <li>Promote <b>compact urban growth</b> by targeting a greater proportion of future housing development, up to 50% of housing built in in Dublin and up to 30% of housing built in other settlements, to be accommodated within and close to the existing built up footprints.</li> <li>Embed a <b>network of Key Towns</b> throughout the Region, which have the capacity to deliver sustainable compact growth and employment for their catchments in tandem with enabling public transport, infrastructure and services.</li> <li>Promote <b>balanced growth</b> in a limited number of economically active settlements which have the identified capacity and potential for moderate growth.</li> <li>Focus on <b>consolidation and targeted 'catch up' investment</b> to support self-sustaining local employment and in services and amenities in places that have experienced rapid commuter driven population growth.</li> </ol>	<p>The new growth enablers presented in the RSES articulate a more focussed summary of the RPOs as already assessed as part of the draft RSES.</p> <p>The RSES explicitly states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p> <p>This statement is accompanied by RPOs 3.2 and 3.3 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>RPO 7.16 states: Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</p> <p>RPO 4.2 states: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p> <p>RPOs 7.12, 7.13, 7.14 and 7.15 deal specifically with the requirements around Flood Risk to ensure compliance with national guidelines and in respect</p>	<p>6. Promote compact urban <b>growth to realise targets of at least 50%</b> of all new homes to be built, <b>to be within or contiguous to the existing built up area of Dublin city and suburbs and a target of at least 30% for other urban areas.</b></p> <p>8. Promote balanced growth in a limited number of economically active settlements which have the identified capacity and potential for <b>self-sustaining growth.</b></p> <p>9. <b>Promote targeted</b> 'catch up' investment to support self-sustaining local employment, and in services, <b>sustainable transport</b> and amenities in places that have experienced rapid commuter driven population growth.</p>	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

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		<ol style="list-style-type: none"> <li>10. Promote regeneration and revitalisation of <b>small towns and villages</b> and support local enterprise and employment opportunities to ensure their viability as service centres for their surrounding rural areas</li> <li>11. Support <b>rural areas</b> by harnessing natural resources to develop renewables, recreation and tourism opportunities including green infrastructure planning and the development of an integrated network of greenways, blueways and peatways.</li> </ol>	<p>of managing and reducing flood risk and the protection of environmentally sensitive sites and habitats.</p> <p>Further, the RSES will include an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.</p> <p>A suite of Guiding Principles in the RSES further aid plan preparation and decision making in the region.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	<p>Amend Growth Enablers for Dublin City &amp; Metropolitan Area, expand enablers to read as follows;</p>	<ol style="list-style-type: none"> <li>1. To sustainably manage Dublin’s growth as critical to Ireland’s competitiveness, achieving growth of 1.4 million people in Dublin City and Suburbs and 1.65 million people in the Dublin Metropolitan Area by 2031.</li> <li>2. To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin and a target of 30% for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life</li> <li>3. To deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites for housing.</li> <li>4. To increase employment in strategic locations, with a focus on re-intensification and regeneration of lands within the M50, and providing for people intensive employment at other sustainable locations near high quality public transport nodes, building on commercial and research synergies in proximity to large employers and activating strategic sites to strengthen the local employment base in commuter towns.</li> <li>5. Enhance co-ordination across Local Authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability to include district heating and water conservation.</li> <li>6. Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the region and to serve the Nation, and safeguard and improve regional accessibility and service by rail, road and communication, with a key focus the Dublin-Belfast Corridor.</li> </ol>	<p>The new growth enablers presented in the RSES articulate a more focussed summary of the RPOs as already assessed as part of the draft RSES.</p> <p>The RSES explicitly states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p> <p>This statement is accompanied by RPOs 3.2 and 3.3 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>RPO 7.16 states: Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</p> <p>RPO 4.2 states: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p>	<ol style="list-style-type: none"> <li>2. To realise ambitious compact growth targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area of Dublin <b>city and suburbs and a target of at least 30%</b> for other metropolitan settlements, with a focus on healthy placemaking and improved quality of life</li> <li>3. To deliver strategic development areas identified in the MASP, located at key nodes along high-quality public transport corridors in tandem with the delivery of infrastructure and enabling services to ensure a steady supply of serviced sites <b>and to support accelerated delivery</b> of housing.</li> <li>4. To increase employment in strategic locations, providing for people intensive employment at other sustainable locations near high quality public transport nodes, building on commercial and research synergies in proximity to large employers, <b>industry clusters and smart specialisation and activating strategic sites</b> to strengthen the local employment base in commuter towns.</li> <li>5. Enhance co-ordination across Local Authorities and relevant agencies to promote more active land management and achieve compact growth targets through the development of infill, brownfield and public lands, with a focus on social as well as physical regeneration and improved sustainability <del>to include district heating and water conservation.</del></li> <li>6. Protect and improve access to the global gateways of Dublin Airport and Dublin Port for the region and to serve the Nation, and safeguard and improve regional accessibility and service by rail, road and communication, with a key focus on the Dublin-Belfast <b>Economic</b> Corridor.</li> </ol>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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			<p>RPOs 7.12, 7.13, 7.14 and 7.15 deal specifically with the requirements around Flood Risk to ensure compliance with national guidelines and in respect of managing and reducing flood risk and the protection of environmentally sensitive sites and habitats.</p> <p>Further, the RSES will include an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.</p> <p>A suite of Guiding Principles in the RSES further aid plan preparation and decision making in the region.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	<p>Amend Growth Enablers for the Core Region, expand enablers to read as follows;</p>	<ol style="list-style-type: none"> <li>To promote continued growth at more sustainable rates, while providing for increased employment and improved local economies, services and functions to allow towns become more self-sustaining and to create the quality of life to attract investment.</li> <li>Drogheda to realise its potential to grow to city scale and secure investment to become a self-sustaining Regional Growth Centre on the Dublin-Belfast Corridor, driving synergies between the Drogheda - Dundalk - Newry cross border network.</li> <li>Commensurate population and employment growth in Key towns, coupled with investment in enabling transport, infrastructure and services to facilitate the achievement of compact growth targets of at least 30% of all new homes to be built, within the existing built up area of settlements.</li> <li>'Catch up' investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.</li> <li>Diversification and specialisation of local economies with a focus on place making and urban regeneration to create the quality of life to attract FDI and indigenous investment and increase high value knowledge-based employment including second site and relocation opportunities.</li> <li>Promote the region for tourism, leisure and recreational activities including development of an integrated greenway network while ensuring that high value assets and amenities are protected and enhanced.</li> </ol>	<p>The new growth enablers presented in the RSES articulate a more focussed summary of the RPOs as already assessed as part of the draft RSES.</p> <p>The RSES explicitly states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p> <p>This statement is accompanied by RPOs 3.2 and 3.3 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>RPO 7.16 states: Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</p> <p>RPO 4.2 states: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure</p>	<ol style="list-style-type: none"> <li>Drogheda to realise its potential to grow to city scale and secure investment to become a self sustaining Regional Growth Centre on the Dublin-Belfast <b>Economic</b> Corridor, driving synergies between the Drogheda - Dundalk - Newry cross border network.</li> <li>Diversification and specialisation of local economies with a focus on <b>clustering, smart specialisation</b>, place making and urban regeneration to create the quality of life to attract FDI and indigenous investment and increase high value knowledge-based employment including second site and relocation opportunities.</li> </ol>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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			<p>providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p> <p>RPOs 7.12, 7.13, 7.14 and 7.15 deal specifically with the requirements around Flood Risk to ensure compliance with national guidelines and in respect of managing and reducing flood risk and the protection of environmentally sensitive sites and habitats.</p> <p>Further, the RSES will include an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.</p> <p>A suite of Guiding Principles in the RSES further aid plan preparation and decision making in the region.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	<p>Amend Growth Enablers for the Gateway Region, expand enablers to read as follows;</p>	<ol style="list-style-type: none"> <li>1. Support continued growth of Athlone, with a focus on quality of life and securing the investment to fulfil its role as a key regional centre and economic driver in the centre of Ireland</li> <li>2. Support compact growth in the regional growth centre of Dundalk to grow to city scale, capitalising on its location on the Dublin – Belfast Corridor to drive the linkage between Dundalk and Newry to strengthen cross border synergy in services and functions.</li> <li>3. 'Catch up' investment to promote consolidation and improvement in the sustainability of those areas that have experienced significant population growth but have a weak level of services and employment for their residents.</li> <li>4. Regeneration of small towns and villages, with a focus on the identification of rural town, village and rural regeneration priorities to bring vibrancy to these areas.</li> <li>5. 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.</li> <li>6. Promote the region as a key destination for tourism, leisure and recreation activities and support the development of an integrated</li> </ol>	<p>The new growth enablers presented in the RSES articulate a more focussed summary of the RPOs as already assessed as part of the draft RSES.</p> <p>The specific reference to publicly owned peatlands in no. 5 is noted. It is acknowledged that peatlands are important ecosystems offering significant benefits for biodiversity as well as offering key ecosystem services such as regulation of climate, water filtration, economic benefits (e.g. energy horticulture sectors), landscape and recreation.</p> <p>The addition of the reference in the key enabler refers to the need to harness the potential of renewable energy in the region looking to publicly owned peat extraction areas as opportunities to promote the creation of replacement greener enterprises notwithstanding the role intact bogs play in carbon sequestration in the first place.</p> <p>EMRA has committed to developing an ecological resource map for the region. This will include designated and undesignated peatlands. The purpose of the resource map is to take a first step in establishing a better understanding of the regional ecological resources and the connectivity that exists between them. This can then be used to better inform decision making across the region. The RSE has already committed, through RPO3.2, to <i>Ensure that all plans, projects and</i></p>	<ol style="list-style-type: none"> <li>2. Support compact growth in the regional growth centre of Dundalk to grow to city scale, capitalising on its location on the Dublin – Belfast Economic Corridor to drive the linkage between Dundalk and Newry to strengthen cross border synergy in services and functions.</li> <li>5. Diversification and growth of smart specialisation of local economies with a strong focus on clustering 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 'Just' transition and realise the benefits of green technologies.</li> <li>6. Promote the region as a key destination for tourism, leisure and recreation activities and support the development of an integrated network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced.</li> </ol>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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		<p>network of greenways, blueways and peatways while ensuring that high value assets and amenities are protected and enhanced</p>	<p><i>activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</i> Furthermore RPO 3.3 states: <i>Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</i></p> <p>The RSES explicitly states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p> <p>RPO 7.16 states: Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</p> <p>RPO 4.2 states: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p> <p>RPOs 7.12, 7.13, 7.14 and 7.15 deal specifically with the requirements around Flood Risk to ensure compliance with national guidelines and in respect of managing and reducing flood risk and the protection of environmentally sensitive sites and habitats.</p> <p>Further, the RSES will include an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.</p> <p>A suite of Guiding Principles in the RSES further aid plan preparation and decision making in the region including specific principles for peatland development.</p>		

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Ch 4	<b>People and Place (86 RPOs)</b>				
	Amend Table 4.1, as follows;	<p><b>New;</b></p> <ul style="list-style-type: none"> <li>Headings for 'Medium to Large Towns' to read i) Moderate Growth Towns and ii) Consolidation Towns</li> </ul> <p><b>Omit;</b></p> <ul style="list-style-type: none"> <li>Population thresholds for 'small towns and villages' and rural areas.</li> </ul>	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.		
	Amend Guiding Principles for Core Strategies. From Chapter 3 - to be relocated in Chapter 4 Expand existing principles no.1-5 and include new principles no. 6-9, to read as follows;	<p>Local Authorities, in developing their Core Strategies and settlement hierarchies will consider the following growth enablers for every part of the Region to meet its potential including;</p> <ol style="list-style-type: none"> <li><b>Economic Growth</b> – Harness opportunities for economic growth by supporting synergies between talent and place, building on identified assets to strengthen enterprise ecosystems and provide quality jobs. Re-intensify employment within existing urban areas, complemented by strategic employment growth in the right locations and diversification of local and rural economies to better withstand economic shocks and sustain national growth.</li> <li><b>Align population, employment and housing growth</b> – Divergence between the places people live and work leads to long-distance commuting and congestion, which is having a negative impact on quality of life. To address this, promote sustainable growth in the right locations and 'catch up' investment and consolidation in local services, amenities and employment in areas that have experienced large scale commuter driven housing development.</li> <li><b>Compact sustainable growth</b> – Promote compact, sequential and sustainable development of urban areas from large to small to realise targets of at least 50% of all new homes to be built, to be within or contiguous to the existing built up area in Dublin city and suburbs and a target of at least 30% for other urban areas. Support co-ordination across Local Authorities and agencies to promote active land management and better use of under-utilised, brownfield and public lands.</li> <li><b>Regeneration and Development</b> – Identify significant ready-to-go regeneration projects in the existing built areas of our cities, towns, villages as well as rural regeneration opportunities, which could leverage private and public-sector support and investment, including NPF and European funding with a focus on social as well as physical regeneration.</li> </ol>	<p>The new growth enablers presented in the RSES articulate a more focussed summary of the RPOs as already assessed as part of the draft RSES.</p> <p>The RSES explicitly states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p> <p>This statement is accompanied by RPOs 3.2 and 3.3 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>RPO 7.16 states: Support the implementation of the Habitats Directives in achieving an improvement in the conservation status of protected species and habitats in the Region and to ensure alignment between the core objectives of the EU Birds and Habitats Directives and Local Authority Development Plans.</p> <p>RPO 4.2 states: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the draft RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p> <p>RPOs 7.12, 7.13, 7.14 and 7.15 deal specifically with the requirements around Flood Risk to</p>	<p>6.Dublin-Belfast <b>Economic</b> Corridor - Safeguard and improve accessibility and service by rail, road and communication between Dublin and Belfast and drive cross border networks between Drogheda, Dundalk and Newry. Post – Brexit, consideration should be given to a process that can establish protocols for environmental protection and movement of people and goods.</p> <p>9.Collaboration – The Assembly will foster collaboration in the allocation of funds to maximise the value for money and delivery of RSES policy and to promote enhanced collaboration between local and regional stakeholders in relation to enterprise and employment, transport, education, retail and service delivery and in the preparation of Local Transport Plans and Urban Area Plans (UAP). There will be a need to co-ordinate the sources of funding of infrastructure, including community facilities that will be located within Joint Urban <b>Area</b> Plans.</p>	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

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		<p>5. <b>Strategic connectivity</b> – Protect and enhance global connectivity including the TEN-T network to ensure the best use of existing and planned transport infrastructure, safeguard national assets and improve sustainable mobility. Enhance regional accessibility as part of an integrated land use and transport strategy to enable the development of designated towns on strategic and public transport corridors and in tandem with enabling infrastructure.</p> <p>6. <b>Dublin Belfast Corridor</b> - Safeguard and improve accessibility and service by rail, road and communication between Dublin and Belfast and drive cross border networks between Drogheda, Dundalk and Newry. Post – Brexit, consideration should be given to a process that can establish protocols for environmental protection and movement of people and goods.</p> <p>7. <b>Healthy Placemaking</b> - To realise sustained economic growth and employment including the integration of better urban design, public realm, amenities and heritage to create attractive places to live, work, visit and invest in. Focus on placemaking to create attractive and sustainable communities to support active lifestyles including walking and cycling.</p> <p>8. <b>Climate Action</b> – to accelerate a transition to a greener, low carbon and climate resilient region with focus on energy transition, carbon sequestration and reduced travel demand through the promotion of sustainable settlement patterns. Support the Climate Action Regional Offices and Local Authorities in their implementation of climate strategies.</p> <p>9. <b>Collaboration</b> – The Assembly will foster collaboration in the allocation of funds to maximise the value for money and delivery of RSES policy and to promote enhanced collaboration between local and regional stakeholders in relation to enterprise and employment, transport, education, retail and service delivery and in the preparation of Local Transport Plans and Urban Area Plans (UAP). There will be a need to co-ordinate the sources of funding of infrastructure, including community facilities that will be located within Joint Urban Plans.</p>	<p>ensure compliance with national guidelines and in respect of managing and reducing flood risk and the protection of environmentally sensitive sites and habitats.</p> <p>Further, the RSES will include an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.</p> <p>A suite of Guiding Principles in the RSES further aid plan preparation and decision making in the region.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	<p>Amend Section 4.3 to include additional guidance that reads as follows;</p>	<p>Core Strategies should apply prioritisation measures rather than de-zoning of land where a surplus of lands is identified in existing plans with regard to the NPF Implementation Roadmap up to 2031. In preparing Core Strategies account should also be given to the consideration of sequential lands which are suitable for the delivery of housing but may not be forthcoming in the Plan period having regard to 2031 Roadmap targets, subject to proper planning and sustainable development.</p>	<p>Prioritisation of lands which are adequately is welcomed as it aligns with national policy and also prevents potential for negative effects on AQ, W, S, BFF and other receptors as a result of pollution. The opportunity should be taken when reviewing core strategies to provide for protection and / enhancement of BFF and the Natura 2000 network in particular rather than holding on to all zonings, some of which will present difficulties to develop in the future given pathways for impact. This would represent proper planning and sustainable development.</p>		
	<p>Amend Guiding Principles for Athlone Joint Urban Area Plan (UAP). Decouple from RPO 4.4 to</p>	<p>The RSES envisages a population target of 30,000 is for the entire settlement of Athlone up to</p>	<p>As previously assessed in the ER, the Joint Area Action Plan will be subject to its own</p>	<p>The RSES envisages a population target of 30,000 is for the entire settlement of Athlone up to</p>	<p>No additional likely significant effects (either positive or negative) in respect of the</p>

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	<p>include as standalone Guiding Principles, expanded to read as follows:</p>	<p>2031. This includes lands within the combined functional area of the two Local Authorities of Westmeath and Roscommon. The preparation and adoption of a Joint Urban Area Plan (UAP) shall be a priority for Westmeath and Roscommon County Council. The joint UAP under agreement of both local authorities is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population which should be generally in proportion to existing population levels in each local authority area. The Joint UAP should also support and provide for the following:</p> <ol style="list-style-type: none"> <li>1. A strategic vision for the future development of Athlone as a Regional Growth Centre including the development of critical mass and reflect its role as a regional driver</li> <li>2. A boundary for the plan area to support the achievement of compact growth targets with a minimum of 30% of new homes to be built within the existing built up area, supported by the large scale delivery of existing Local Area Plan (LAP) lands at Curragh Lissywollen, Cornamagh, Cornamaddy and Monksland / Bellanamullia</li> <li>3. Preparation of a joint Economic Strategy to promote increased employment and enterprise opportunities in Athlone, and to facilitate enhanced co-ordination between local authorities, enterprise agencies and regional stakeholders to support the phased delivery of serviced employment lands at Garrycastle IDA, Blyry, Creggan and Monksland.</li> <li>4. The regeneration of underused, vacant or derelict town centre lands and the consolidation of retail and commercial functions in line with a joint Retail Strategy to be prepared by the local authorities.</li> <li>5. Identify infrastructural investment priorities and promote a joined-up approach to the delivery of key enabling infrastructure to facilitate the sequential delivery of strategic residential, employment and regeneration development areas</li> <li>6. Support the upgrading of the Water Supply and Treatment System to meet the growth targets set in this strategy.</li> <li>7. Promote Athlone as a sustainable transport hub, of national and regional importance and support the preparation of a joint Local Transport Plan between Westmeath and Roscommon County Councils in collaboration with transport agencies and key stakeholders to improve sustainable mobility in the town.</li> <li>8. Support the proposal to make AIT a Technological University and for the development of a 'smart cities' approach to drive research, innovation and EU funding opportunities in Athlone.</li> <li>9. Support the development of a cross sectoral approach to maximise the tourism potential of the River Shannon and Lough Ree, involving</li> </ol>	<p>environmental assessments which will have regard to the necessary environmental legislation, as is required similar to a Local Area Plan.</p> <p>The RSES recognises that where other strategies and plans undergo review or changes to reflect the national and regional policy objectives and outcomes of both the NPF, and subsequently the RSES, they should also consider any relevant environmental requirements.</p> <p>The RSES explicitly states that feasibility studies will be carried out to support decision making in relation to policy base for this RSES and this will include an environmental appraisal which considers the potential effects on the wider environment, including specifically the Natura 2000 Network (See Chapter 3 Growth Strategy - Assessment of Possible Impacts – Environmental Assessment).</p> <p>The narrative explicitly states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p> <p>This statement is accompanied by RPOs 3.2 and 3.3 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>The importance of Athlone in the context of proximity to significant sites of nature conservation interest recognised for their European and national importance is re-iterated here for clarity. The development of Athlone as a Regional Growth Centre has the potential for negative impacts on BFF and W in particular and as such the joint UAP must recognise and reflect the increased sensitivity of constraint in the area and the risk for adverse effects alone and in combination with other plans and projects on sites of nature conservation interest, their habitats and their species.</p>	<p>2031. This includes lands within the combined functional area of the two Local Authorities of Westmeath and Roscommon. The preparation and adoption of a <b>statutory</b> Joint Urban Area Plan (UAP) by Westmeath and Roscommon County Councils is to be a priority. The joint UAP under agreement of both local authorities, is the appropriate mechanism to determine the functional urban area and plan boundary along with the distribution of population which should be generally in proportion to existing population levels in each local authority area. <b>In tandem with the requirements outlined in the Implementation Roadmap for the National Planning Framework</b> the Joint UAP for the Regional Centre of Athlone should endeavour to support and provide for the following:</p> <ol style="list-style-type: none"> <li>2. A boundary for the plan area to support the achievement of compact growth targets with a minimum of 30% of new homes to be built within the existing built up area, supported by the large scale delivery of lands at Curragh Lissywollen, <b>Lissywollen South</b>, Cornamagh, Cornamaddy and Monksland / Bellanamullia.</li> <li>3. <b>Preparation of a wider collaborative Economic Development Strategy</b> to promote increased employment and enterprise opportunities in Athlone, and to facilitate enhanced co-ordination between local authorities, enterprise agencies and regional stakeholders to support the phased delivery of serviced employment lands at Garrycastle IDA, Blyry, Creggan and Monksland. <b>In promoting the economic development of Athlone, this may include support for the consideration/ investigation of fast track planning mechanisms such as, the designation of an SDZ.</b></li> <li>11. Support ongoing implementation of flood risk management and flood alleviation measures <del>to facilitate the growth of Athlone subject to the outcome of appropriate environmental assessment and taking account of the proximity of sites of international nature conservation interest</del> to facilitate the growth of Athlone.</li> </ol>	<p>SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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		<p>Westmeath, Roscommon and Longford County Council and relevant stakeholders.</p> <p>10. Support the implementation of the Athlone Waterfront Strategy Support to provide for public realm and amenity enhancements and tourist related developments along the waterfront</p> <p>11. Support ongoing implementation of flood risk management and flood alleviation measures to facilitate the growth of Athlone subject to the outcome of appropriate environmental assessment and taking account of the proximity of sites of international nature conservation interest</p> <p>12. Support the development of an Open Space Strategy with provision for a public park in Monksland and the provision of sustainable transport, recreation and amenity spaces to support existing and future populations.</p>			
Ch 5	Dublin MASP - 8 RPOs				
	Amend Guiding Principles. Further summarised to read as follows:	<ol style="list-style-type: none"> <li><b>Dublin as a Global Gateway</b> – In recognition of the international role of Dublin, to support and facilitate the continued growth of Dublin Airport and Dublin Port, to protect and improve existing access and support related access improvements.</li> <li><b>Compact sustainable growth with accelerated housing delivery</b> – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target to 50% of all new homes within or contiguous to the built-up area in Dublin, and at least 30% in other settlements. To support a steady supply of sites to accelerate housing supply and to achieve higher densities in urban built up areas, supported by improved services and public transport.</li> <li><b>Integrated Transport and Land use</b> – To focus growth along existing and proposed high quality public transport corridors and nodes on the expanding public transport network and to support the delivery and integration of 'BusConnects', DART expansion and LUAS extension programmes, and Metro Link, while maintaining the capacity and safety of strategic transport networks.</li> <li><b>Increased employment density in the right places</b> – To plan for increased employment densities within Dublin city and suburbs and at other sustainable locations near high quality public transport nodes, near third level institutes and existing employment hubs, and to relocate less intensive employment uses outside the M50 ring and existing built-up areas.</li> <li><b>Alignment of growth with enabling infrastructure</b> – To promote quality infrastructure provision and capacity improvement, in tandem with new development and aligned with national projects and improvements in water and</li> </ol>	<p>Refinement of existing content already assessed in the SEA/AA/FRA of the draft RSES.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>	<ol style="list-style-type: none"> <li>Compact sustainable growth and accelerated housing delivery – To promote sustainable consolidated growth of the Metropolitan Area, including brownfield and infill development, to achieve a target to 50% of all new homes within or contiguous to the built-up area of Dublin city and suburbs, and at least 30% in other settlements. To support a steady supply of sites and to accelerate housing supply, in order to achieve higher densities in urban built up areas, supported by improved services and public transport.</li> <li>Alignment of growth with enabling infrastructure – To promote quality infrastructure provision and capacity improvement, in tandem with new development and aligned with national projects and improvements in water and waste water, sustainable energy, waste management and resource efficiency, including district heating and water conservation measures.</li> </ol>	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.

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		<p>waste water, sustainable energy, waste management and resource efficiency, including district heating and water conservation measures.</p> <p>6. <b>Social Regeneration</b> – To realise opportunities for social as well as physical regeneration, particularly in those areas of the metropolitan area which have been identified as having high relative deprivation</p> <p>7. <b>Identify Future Development Areas</b> – To identify future development area that may be delivered beyond the lifetime of the draft RSES, but within the longer-term 2040 horizon set out by the NPF.</p> <p>8. <b>Metropolitan Scale Amenities</b> – To enhance provision of regional parks and strategic Green Infrastructure to develop an integrated network of metropolitan scale amenities, and to develop greenways/blueways along the canals, rivers and coast as part of the implementation of the National Transport Authorities’ Cycle Network Plan for the Greater Dublin Area.</p> <p>9. <b>Co-ordination and active land management</b> – To enhance co-ordination across Local Authorities and relevant agencies to promote more active urban development and land management policies that help develop underutilised, brownfield, vacant and public lands.</p>			
	<p>Amend Rail projects, to include new amendments to DART, LUAS and Metrolink projects (See also proposed amendment no.74 and 108) List of rail projects to read as follows;</p>	<ul style="list-style-type: none"> <li>• DART Expansion Programme - new infrastructure and electrification of existing lines, including provision of electrified services to Drogheda and further north on the Northern Line, Celbridge-Hazelhatch or further south on the Kildare Line, Maynooth and M3 Parkway on the Maynooth/Sligo Line, while continuing to provide DART services on the South-Eastern Line as far south as Greystones</li> <li>• New stations to provide interchanges with bus, LUAS and Metro network including at Kishoge, Heuston West, Cabra, Glasnevin, Pelletstown and Woodbrook</li> <li>• Implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy</li> <li>• Complete construction of Metrolink from Swords to Sandyford, including underground extensions to UCD and Knocklyon from Charlemont.</li> <li>• LUAS Green Line Capacity Enhancement in advance of Metrolink; and</li> <li>• Appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan, Poolbeg, Hazelhatch, Booterstown and Blessington.</li> <li>• In principle there is a need to carry out an evaluation of underground metro routes within the M50</li> </ul>	<p>The majority of the rail projects were previously assessed and it was stated in the mitigation that these priorities should be pre-faced by the following text: <i>...subject to appropriate environmental assessment and the outcome of the planning process.</i></p> <p>The assessment previously recorded is relevant to the proposed amendments. This includes positive long-term benefits to PHH, AQ, CF and MA by investing in much needed rail based public transport infrastructure.</p> <p>A modal shift from car to public transport has significant direct and indirect positive impacts for PHH, AQ and CF in particular with reduced transport-related emissions such as particulate matter, NOx and greenhouse gases.</p> <p>It was previously acknowledged that the construction of any linear transport option has inherent potential for negative impacts on BFF, CH, LandS, LS and W in particular as a result of short-term temporary construction-related impacts and longer-term permanent operational impacts associated with fragmentation of habitats, disturbance of species, deterioration of environmental quality and in some cases introduction of nuisance which would particularly be the case with respect to any underground extension of Metrolink to UCD and Knocklyon.. The construction and operational impacts arising from the proposed rail-related development proposals must be subject to robust feasibility,</p>		

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			route selection, appropriate environmental assessment (EIA, AA EclA and FRA) and the planning process at the project level.		
	Amend Road Projects, to reflect national road projects. List to read as follows;	<ul style="list-style-type: none"> <li>M4 Maynooth to Leixlip</li> <li>M11 from Jn 4 M50 to Kilmacanogue</li> <li>N3 Clonee to M50</li> <li>N81 Tallaght to Hollywood</li> </ul> <p><b>Omit;</b></p> <ul style="list-style-type: none"> <li>Dublin Port Southern Access Route</li> </ul>	<p>The majority of the road projects were previously assessed with the exception of the N81 Tallaght to Hollywood.</p> <p>As with the other road projects mentioned, there is potential for negative changes to BFF and PHH as a result on provision of roads projects. Key concerns include: negative impacts in key indicators of conservation value including air and water quality; potential disturbance to key species; potential reduction of habitat area; and potential habitat or species fragmentation as a result of routing; and continued promotion of car based modes of transport will also negatively influence climate change with potential indirect effects for European sites at a national and regional scale.</p> <p>The RSES clearly states as part of RPO 8.8 that support for delivery of these roads is <i>subject to appropriate environmental assessment and the planning process.</i></p> <p>Where this is also applied to the N81 road project no additional likely significant effects in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	Amend Park & Ride. To be renamed;	'New and Enhanced park and Ride;	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.		
	Amend Table 5.1 Phasing/Enabling Infrastructure for MASP as follows;	<p><b>City Centre within the M50</b></p> <ul style="list-style-type: none"> <li>City Centre: Short to Medium term; No requirement for infrastructure, Long term; capacity supported by DART Underground</li> <li>Naas Road/Ballymount (significant brownfield lands in South Dublin and Dublin City Council areas, with potential for residential development and more intensive employment/mixed uses) Medium to Long Term; include new Luas stop</li> </ul> <p><b>North-South DART Corridor</b></p> <ul style="list-style-type: none"> <li>Bray Fassaroe*: Short-medium term; High capacity bus between Bray and Fassaroe</li> </ul> <p><b>North-West Corridor</b></p> <ul style="list-style-type: none"> <li>Dublin 15 lands**: Short term; Improved Bus connections to Dublin Enterprise Zone</li> <li>Maynooth; Short to medium term; DART expansion, road upgrades, bridge, sewer connection and Maynooth Outer Orbital Route.</li> <li>Dunboyne; Amend to "Sequential development prioritising zoned and serviced lands near the railway station and town centre and at Dunboyne North at M3 Parkway station"</li> </ul> <p><b>Metrolink/LUAS Green line</b></p>	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from the proposed alteration to the draft plan subject to the application of the mitigation measures already proposed including the need for SEA/AA/EIA of plans and projects emanating from the RSES; and critically the support for transport infrastructure [road, rail etc] being subject to the outcome of appropriate environmental assessments and planning.		

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		<ul style="list-style-type: none"> <li>Dun Laoghaire Rathdown; Short to medium term- Omit Metrolink</li> <li>Swords-Lissenhall;** Medium to Long Term; Improved bus connections</li> </ul> <p>*Development at Fassaroe will be undertaken in collaboration between Wicklow County Council and transport agencies</p> <p>**Dublin Enterprise Zone and Lissenhall are not directly served by existing or planned rail and will require improve bus connections and demand management measures</p>			
	<p>Amend Core Strategy, to include additional guidance that reads as follows;</p>	<p>The determination of population targets for local authorities within the MASP including the population targets for the city and the Metropolitan Key towns is a matter for the agreement in consultation with the MASP Implementation Group after the adoption of the RSES to inform the preparation of core strategies of the relevant city and county development plans.</p>	<p>The SEA ER, NIR and FRA identify the environmental sensitivities and considerations relevant to population growth. These sensitivities and the mitigation identified in each of the MASP and key growth towns must be applied as the lower tiers of planning are rolled out.</p>	<p>The determination of population targets for local authorities within the MASP <b>in accordance with the NPF and this strategy</b>, including the population targets for the city and the metropolitan key towns, <b>should be agreed in consultation with the MASP Implementation Group, within six months of publication of the RSES</b> to inform the preparation of the core strategies of the relevant city and county development plans. <b>Should it not be possible to reach agreement within the above timeframe, the matter will be referred to the Minister for further determination.</b></p>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>
	<p>New Guiding principles for the location of strategic employment</p>	<p>Include a high-level summary of Section 6.3 Guiding Principles, to read as follows: The Economic Strategy sets out Guiding Principles for the location of strategic employment areas that include access to;</p> <ul style="list-style-type: none"> <li>suitable locations (depending on the extent to which an enterprise is people or space intensive);</li> <li>serviced sites (based on whether an industry is dependent on a particular infrastructure such as energy, water, transport or communications networks);</li> <li>connectivity (including access to international markets that requires proximity to an airport/port);</li> <li>skilled labour force (proximity to third level education and lifelong learning) and</li> <li>local strengths (a diverse sectoral mix, emerging clusters or cross industry value chains),</li> </ul> <p>See Section 6.3 for full list of Guiding Principles."</p>	<p>The RSES explicitly states that at the project consent stage if it appears that any element of the RSES cannot be implemented without adverse impacts which cannot be adequately mitigated or compensated then the proposals will only make provision for the level and location of development for which it can be concluded that there will be no adverse effect.</p> <p>This statement is accompanied by RPOs 3.2 and 3.3 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>RPO 4.2 states: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p> <p>RPOs 7.12, 7.13, 7.14 and 7.15 deal specifically with the requirements around Flood Risk to ensure compliance with national guidelines and in respect of managing and reducing flood risk and</p>	<ul style="list-style-type: none"> <li>suitable locations (depending on the extent to which an enterprise is people or space intensive <b>or subject to environment constraints</b>);</li> <li>local strengths (a diverse sectoral mix, research, innovation and technology centres, <b>start-up hubs and incubators</b>, emerging clusters or cross industry value chains),</li> </ul>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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			<p>the protection of environmentally sensitive sites and habitats.</p> <p>Further, the RSES will include an Appendix identifying key aspects of the environmental profile of all the Regional Growth Centres and Key Towns which will inform future decision-making for project/plans.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	<p>Amend Table 5.2 Strategic employment development areas, to include UCD &amp; Knocklyon (see also proposed amendment no.68 and 108) as follows:</p>	<ul style="list-style-type: none"> <li>Metrolink/LUAS Greenline; South County Dublin (Cherrywood, Ballyogan, Sandyford, UCD &amp; Knocklyon)</li> </ul>	<p>The inclusion of UCD and Knocklyon is noted. As with RPOs already assessed, it is essential that the development in these areas is phased in line with services provision. While UCD is serviced by bus connection and is in direct proximity to good road and rail [DART] provision, additional public transport capacity will be required to facilitate further employment in parallel with a clear strategy to reduce dependence on car transport to prevent valuable strategic development lands being devoted to car parking. Similarly to unlock potential for strategic lands in Knocklyon it is essential that Metrolink/LUAS Greenline plans for services in that area are committed in both planning and budgetary terms before advancing the area as a strategic employment development area.</p> <p>RPOs 3.2 and 3.3 detailing the requirements for environmental assessment of all plans, projects and activities including SEA, EIA and AA as appropriate and that identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</p> <p>RPO 4.2 states: Infrastructure investment and priorities shall be aligned with the spatial planning strategy of the RSES. All residential and employment developments should be planned on a phased basis in collaboration with infrastructure providers so as to ensure adequate capacity for services (e.g. water supply, wastewater, transport, broadband) is available to match projected demand for services and that the assimilative capacity of the receiving environment is not exceeded.</p> <p>RPOs 7.12, 7.13, 7.14 and 7.15 deal specifically with the requirements around Flood Risk to ensure compliance with national guidelines and in respect of managing and reducing flood risk and the protection of environmentally sensitive sites and habitats.</p>		

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			No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.		
Ch 6	Economy and Employment				
		<i>Support Offaly County Council, Bord na Mona and Coillte in the development of the 'Midlands Cycling Destination – Offaly'</i>	Potential for medium to long-term direct positive impacts in AQ, CF, PHH and indirect positive impacts on MA. However, as above, cycleways have the potential for direct and indirect negative impacts on BFF in particular as a result of habitat loss and disturbance from routing and species disturbance and / or loss as a result of disturbance from cyclists and associated parking and service facilities that may be required. A robust feasibility study and route selection is therefore needed to ensure that this RPO does not give rise to negative effects on BFF and W and does not lead to likely significant effects on any European sites or protected species. It is recommended that this RPO includes reference to a feasibility study and a route selection.		
Ch 7	Environment and Climate				
	Amend Table 7.1 Strategic Natural, Cultural and Heritage Assets to include additional assets under the following headings;	<ul style="list-style-type: none"> <li>• <b>Maritime towns and beaches</b> - Wicklow town</li> <li>• <b>Lakes, Rivers and Canals</b> - Lough Tay – Lough Dan on the Cloghoge River, Vartry Reservoir, River Slaney and tributary Derry River.</li> <li>• <b>Greenways / Blueways:</b> Liffey Valley, Dodder, Lakelands Greenway, Newgrange to Newbridge Greenway, Blessington Greenway, Coastal Greenway from Wicklow to Greystones, Arklow – Shillelagh recreational trail. Refer to the Green &amp; Silver triangular navigation route encompassing Dublin, Royal Canal, River Shannon and Grand Canal.</li> <li>• <b>Bogs and peatlands;</b> Abbeyleix Bog</li> <li>• <b>National and Regional parks;</b> Avondale and Kilmacurragh. Lough Ree and Mid-Shannon Wilderness Park and Lanesborough Commons North Park, Curragh Plains</li> <li>• <b>Medieval, Historic and Walled towns;</b> Kildare, Naas</li> <li>• <b>Heritage sites;</b> Curragh Plains, Balltinglass Hilfort Structure</li> </ul>	<p><i>While the inclusion of these natural assets is broadly positive, encouraging appreciation of the receiving natural and cultural environment, encouraging healthy places and reducing dependency on fossil fuel based transport, there is potential for negative effects particularly in relation to BFF.</i></p> <p><i>Green and blue infrastructure is first and foremost a transport corridor which may (or may not) enhance biodiversity. Where it can be sustainably delivered and sensitively integrated into the natural environment it can provide a corridor for dispersal and enhanced foraging opportunities. However without due recognition of limitations such as light disturbance leading to impacts on bats and birds [feeding, nesting etc.], transport and spread of invasive species and loss/disturbance of habitats and species, the value of the infrastructure can be limited to movement of people. To avoid such a limitation the commitments already made within the RSES should be fully adhered to including:</i></p> <p><b>RPO 3.2:</b> <i>Ensure that all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.</i></p> <p><b>RPO 3.3:</b> <i>Identification of suitable employment and residential lands and suitable sites for infrastructure should be supported by a quality site selection process that addresses environmental concerns such as landscape, cultural heritage, ensuring the protection of water quality, flood risks and biodiversity as a minimum.</i></p> <p><b>RPO 3.4:</b> <i>Local Authorities shall promote an Ecosystems Services Approach in the preparation of statutory land use plans.</i></p>		

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			<p><b>RPO 6.14:</b> Support the preparation and implementation of Visitor Experience Development Plans within the Region to underpin the overarching regional tourism brands and to deliver greater tourism benefits and to promote the natural and cultural assets of the Region.</p> <p><b>RPO 6.17:</b> Support the preparation and implementation of Local Authority Tourism Strategies and Diaspora Strategies. All tourism strategies and plans should include clear monitoring protocols to monitor the ongoing effect of tourism on sensitive features with particular focus on natural and built heritage assets.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	Amend Guiding Principles for Green Infrastructure to include additional bullet point as follows;	<ul style="list-style-type: none"> <li>• <b>Carbon Sequestration</b> - Local Authorities should consider the potential for carbon sequestration in GI Strategies, whereby certain areas can be considered as strategic and integral mechanism for the long-term storage of carbon to mitigate the contribution of fossil fuels emissions and combat climate change.</li> </ul>	As above. The function of the GI should not be assumed to equate to protection of all aspects of the environment. As per RPO 3.2 all plans, projects and activities requiring consent arising from the Regional Spatial and Economic Strategy are subject to the relevant environmental assessment requirements including SEA, EIA and AA as appropriate.		
<b>Ch 8</b>	<b>Connectivity</b>				
	Amend Section 8.3 Guiding Principles for Integration of Land Use and Transport, as follows;	<p><b>New;</b> Include reference to DMURS</p> <p><b>Amend</b> second bullet point as follows;</p> <ul style="list-style-type: none"> <li>• The predicted impact of the potential land use and transport infrastructure on modal split and transport greenhouse gas emissions should be assessed to deliver on national and regional targets using the assessment approaches identified or developed in accordance with RPO 7.28.</li> </ul> <p><b>Omit</b> the following Guiding principles:</p> <ul style="list-style-type: none"> <li>- 'support reverse commuting for those living in urban centres and commuting to work elsewhere'</li> <li>- 'The predicted impact of the potential land use and transport infrastructure on modal split and transport greenhouse gas emissions should be assessed to deliver on national and regional targets'</li> </ul>	Revision of bullet point for clarity. No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.	<p>The Draft RSES provides the basis for the integration of land use and transport planning in the Region, informing the preparation and implementation of plans, programmes and projects at all levels.</p> <ul style="list-style-type: none"> <li>•City and County Development Plans shall undergo assessment of their impact on carbon reduction targets in their preparation, and shall include measures to monitor and review progress towards carbon reduction targets.</li> <li>•Support investment in infrastructure and behavioural change interventions to encourage and support a shift to sustainable modes of transport and support the use of design solutions and innovative approaches to reduce car dependency. Development will have regard to the Design Manual for Urban Roads and Streets, where appropriate.</li> <li>•Where additional road capacity is provided within or around any town which has an objective to cater for traffic that currently uses the road network in central areas and their immediate environs, that this additional capacity would be used for the improvement of the public transport, walking and cycling networks within the towns through the reallocation of road space to these modes.</li> <li>•Ensure the protection of Natura 2000 networks and associated ecological linkages. Plans and projects that have the potential to negatively impact on Natura 2000 sites should be subject to the requirements of the Habitats Directive.</li> </ul>	<p>The additional bullets provide further clarity and context for the Guiding Principles, including consideration of sustainable transport integration and ensuring protection of Natura 2000 networks, which supports the RPOs that follow.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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	<p>Amend Table 8.2 Rail Projects for the Region. to include new amendments to DART, LUAS and Metrolink projects (See also proposed amendment no.68 and 74) List of rail projects to read as follows;</p>	<ul style="list-style-type: none"> <li>• DART Expansion Programme - new infrastructure and electrification of existing lines, including provision of electrified services to Drogheda and further north on the Northern Line, Celbridge-Hazelhatch or further south on the Kildare Line, Maynooth and M3 Parkway on the Maynooth/Sligo Line, while continuing to provide DART services on the South-Eastern Line as far south as Greystones</li> <li>• Provide for an appropriate level of commuter rail service in the Midlands and South-East</li> <li>• Complete the construction of the National Train Control Centre</li> <li>• New stations to provide interchange with bus, LUAS and Metro network at including Kishoge, Heuston West, Cabra, Glasnevin, Pelletstown and Woodbrook</li> <li>• A feasibility study of high-speed rail between Dublin Belfast, Dublin Limerick Junction/Cork will be carried out</li> <li>• Implement the extension of the Dunboyne/M3 Parkway line to Navan during the Mid Term Review of the GDA Transport Strategy</li> <li>• Complete construction of Metrolink from Swords to Sandycroft, including underground extensions to UCD and Knocklyon from Charlemont.</li> <li>• LUAS Green Line Capacity Enhancement in advance of Metrolink</li> <li>• Undertake appraisal, planning and design of LUAS network expansion to Bray, Finglas, Lucan, Poolbeg, Hazelhatch, Booterstown and Blessington.</li> <li>• In principle there is a need to carry out an evaluation of underground metro routes within the M50</li> </ul>	<p>See above. All are subject to the outcome of appropriate environmental assessment and planning.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	<p>Amend Table 8.4 Road Projects for the Region, to reflect national projects. List of road projects to read as follows;</p>	<ul style="list-style-type: none"> <li>• M7 Naas to Newbridge bypass widening, Osberstown Interchange and Sallins Bypass</li> <li>• N2 Slane Bypass</li> <li>• N2 Rath Roundabout to Kilmoon Cross</li> <li>• N2 Ardee to south of Castleblaney</li> <li>• M4 Maynooth to Leixlip</li> <li>• N4 Mullingar to Longford (and Sligo)</li> <li>• M11 from Jn 4 M50 to Kilmacanogue</li> <li>• N3 Clonee to M50</li> <li>• N52 Ardee Bypass</li> <li>• N52 Tullamore to Kilbeggan</li> <li>• N80 Improvements including inter regional and intra regional accessibility.</li> <li>• N81 Tallaght to Hollywood scheme including linkage roads from Baltinglass and Dunlavin to N9 from N81.</li> </ul> <p><b>Omit;</b></p> <ul style="list-style-type: none"> <li>• Dublin Port Southern Access Route</li> </ul>	<p>See above. All are subject to the outcome of appropriate environmental assessment and planning.</p> <p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>		
	<p><b>Amend Park &amp; Ride.</b> To be renamed;</p>	<p>'New and Enhanced park and Ride'</p>			
<p><b>Ch 9</b></p>	<p><b>Quality of Life</b></p>				

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	<p>Amend Guiding Principles for Urban Infill and Brownfield Regeneration. Expanded Guiding Principles to read as follows</p>	<p>Local authorities, in the preparation of the Core Strategies of their Development Plans, shall consider the following Guiding Principles to deal with the complexities of brownfield and infill sites;</p> <ol style="list-style-type: none"> <li>1. The establishment of a database of strategic brownfield and infill sites as part of the active land management process, that identifies the development capacity and any constraints on sites that are zoned for development including potential contamination and incorporating other relevant databases such as the Derelict Sites Register and the Vacant Sites Register. The database should be spatially referenced and searchable to allow for regular updating and monitoring and so that brownfield re-use can be managed and co-ordinated across multiple stakeholders.</li> <li>2. Proposals for strategic brownfield and infill sites should be accompanied by a site brief and/or masterplan that sets out a phased programme for the regeneration of the site and demonstrates how the proposal will comply with National Guidelines that seek to achieve sustainable compact development and to integrate principles of good urban design and placemaking.</li> <li>3. Local authorities should liaise with the Regional Waste Management Office when considering proposals for the development of brownfield sites that require the offsite disposal of contaminated waste, so that a programme for site remediation can be identified early and considered by all stakeholders. Proposals for brownfield regeneration in strategic locations should be accompanied by a site risk statement and waste plan and for the disposal of any wastes arising including any hazardous or contaminated material.</li> <li>4. Encourage pilot projects for the re-use of brownfield sites and encourage active temporary uses where feasible and as far as practicable to encourage activation of vacant sites that require longer lead in time regeneration processes.</li> <li>5. Set out measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres</li> </ol>	<p>The impacts associated with brownfield development have been considered already in the SEA ER, the NIS and the FRA. It is essential that any proposals for specific site remediation and development are accompanied by a robust risk assessment of potential pathways for impact and that compliance can be achieved with the objectives of not only the Habitats directive but also obligations under the Water Framework Directive.</p>	<p>6. Explore opportunities for biodiversity enhancement to improve ecological connectivity as part of the strategic re-intensification of urban infill and brownfield sites.</p>	<p>This addition is overall positive. Potential for spread of invasive species should also be considered. Otherwise it is considered there are no additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>
	<p>New Guiding principles for Healthy Placemaking. Guiding Principles to read as follows;</p>	<ul style="list-style-type: none"> <li>- Future development prioritises the need for people to be physically active in their daily live and promote walking and cycling in the design of streets and public spaces</li> <li>- New schools and workplaces are linked to walking and cycling networks</li> <li>- Exposure of children to the promotion of unhealthy foods is reduced such as the careful consideration of the location of fast food outlets in the vicinity of schools and parks</li> <li>- Provision of open space should consider types of recreation and amenity uses required</li> </ul>	<p>Positive impacts for PHH. Indirect positive impacts for AQ and CF by encouraging active transports modes such as cycling and walking.</p> <p>As already identified in the NIR and acknowledged in the RSES, there is a need to support decision making on the location and nature of the supporting infrastructure provided by robust feasibility and route section studies and subject to the outcome of appropriate environmental assessment including SEA, EIA, AA as detail becomes available.</p>	<p>Guiding principles for Healthy Placemaking, by ensuring that:</p> <ul style="list-style-type: none"> <li>- Good urban design principles are integrated into the layout and design of new development, as set out in Departmental Guidelines 'Sustainable Residential Development in Urban Areas' and the 'Design Manual for Urban Roads and Streets (DMURS)</li> </ul>	<p>No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.</p>

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		<ul style="list-style-type: none"> <li>- Public open spaces to have good connectivity and be accessible by safe, secure walking cycling routes</li> <li>- Open space to be planned for on a multi-functional basis incorporating ecosystem services, climate change measures, green infrastructure and key landscape features in their design.</li> </ul>			
<b>Ch 10</b>	<b>Infrastructure</b>				
	Amend Table 10.1 Strategic Water Services Projects Amend 1st bullet point to read as follows;	The Water Supply project for the Eastern and Midlands Region to supply water to the Greater Dublin Area (GDA) and other communities including Athlone.	AS noted in the assessment already presented in the ER and NIR, it is acknowledged that an EIAR and Appropriate Assessment of the project will be considered by the planning authority. All potential impacts of the scheme, including abstraction, will be addressed in the EIAR and the Natura Impact Statement that are currently under preparation.		
	Amend Guiding Principles relating to Surface Water. Include new bullet point under existing Guiding Principle to read as follows;	<ul style="list-style-type: none"> <li>• EMRA supports the development of Drinking Water Protection Plans in line with the requirements of the Water Framework Directive and the current and future cycles of River Basin Management Plans. In this regard, EMRA supports the inclusion of objectives in County Development Plans relating to the provision of mitigation and protection measures for all protected areas, including Drinking Water Protected Areas and associated Source Protection Plans.</li> </ul>	Positive impacts for W, PHH and MA. This further supports integration of WFD into land use planning and will contribute to sustainable water management. This in turn will have positive long-term impacts for water dependent ecosystems including those designated as European sites or supporting the health of such sites.		
	Amend Guiding principles relating to the provision of energy network Include new bullet point under existing Guiding Principles to read as follows;	<ul style="list-style-type: none"> <li>• Regard for any National or Regional Landscape/Seascape Character Assessment</li> </ul> <p>Include addition to text in existing second bullet point:</p> <ul style="list-style-type: none"> <li>• "and address issues of climate resilience, biodiversity, impact on soils and water quality."</li> </ul>	No additional likely significant effects (either positive or negative) in respect of the SEA/AA/FRA from this proposed alteration to the draft plan.		