



**Response to Public Consultation on  
Eastern and Midland Regional Assembly  
Draft Regional Spatial and Economic Strategy  
from  
Green Party/ Comhaontas Glas**

23<sup>rd</sup> January 2019

## **Introduction**

We welcome the opportunity to respond to the draft Regional Spatial and Economic Strategy (RSES).

In our submission in advance of the drafting of the RSES, we pointed out that Project Ireland 2040, also known as the National Planning Framework (NPF)/National Development Plan (NDP) fails to put Ireland on the path for transitioning to sustainable spatial and economic patterns. We have continued at the national, regional and local level to focus on the failure of the Government to base the NPF/NDP (Project Ireland 2040) on a Strategic Environmental Assessment process containing a useable assessment of the environmental impact of the combined Framework/Plan. Unfortunately, to date, we still have not seen an assessment of the environmental impact of Project Ireland 2040, including of its climate impact, much of which is susceptible to quantitative assessment using long-standing assessment methods run by the National Transport Authority.

In our a submission before the draft, we pointed out that it would, therefore, have to go further than the NPF/NDP and we focussed our submission on some of the elements required for the RSES to be a sustainable spatial and economic strategy.

## **Goals and Vision**

In our previous submission we made said:

The Strategy should start by establishing overall goals. The Sustainable Development Goals (SDGs) were adopted by Ireland and the other UN members in 2015. We suggest the goals for the Strategy should reflect those of the SDGs which form the greatest challenges in the Irish context and are most relevant to the development of a regional spatial and economic strategy.

The overall goals should be developed taking account of other international commitments we have made including in the UN Framework Convention on Climate Change and the UN Convention on Biological Diversity. They should incorporate the transition to a low-carbon climate resilient environmentally sustainable economy which the Oireachtas established as a national objective in 2015.

The vision the Strategy should aim for is one of sustainable prosperity and a responsible economy, not just as a generalisation, but expressed in terms of the objectives already established at national and international levels and measured by meaningful indicators.

We very much welcome the fact that the draft RSES is based on the Sustainable Development Goals (SDGs). Relying on the SDGs in the development of the Regional Strategic Objectives (RSOs) has led to those objectives being much closer aligned to sustainable development than if they had simply relied on the National Strategic Objectives. For example, the proposed “RSO 4 Healthy Communities” reflects an understanding that health relies on the protection of the environment as well as healthcare and services much better than the associated “NSO 10 Access to Quality Childcare, Education and Health services”.

Our greatest concern in relation to this aspect of the RSES is in relation to indicators. No indicators are specified in the Strategy itself and those set out in the Strategic Environmental Assessment Report are poorly thought out and unclear. We note that the SEA Report itself says

“It is noted that this monitoring proposal will only be finalised following consultation to allow stakeholders the opportunity to suggest targets and indicators which they feel better represent the environmental receptor and/ or better track progress in achieving objectives.”

The stakeholders should have been consulted before the draft was published and we should now be giving our opinion on proposed indicators, rather than reacting to proposals which aren't credible.

## **Biodiversity**

In our previous submission we said:

The Strategy should set out the basis on which land use and spatial planning will play its part in halting and reversing biodiversity loss, as well as protecting our rivers and lakes, and mitigating and adapting to climate change.

Although Ireland committed in the Convention on Biological Diversity and has set out policies in the National Biodiversity Plan, to halt the loss of biodiversity, biodiversity continues to be diminished at an alarming rate both nationally and globally. The Strategy must take the need to protect and restore biodiversity as one of its starting points.

This includes setting out spatial planning principles and considerations for the identification and implementation of large-scale biodiversity and landscape areas. One of the most important challenges for the Region is the large-scale rewetting and restoration of the great raised bogs of the Midlands. The restoration of our natural and semi-natural woodlands, in locations across the Region is a further example.

In large areas of the Region, “rewilding” approaches could both serve to generate eco-tourism based incomes for local people and enable the cost-effective protection of water quality and nature conservation. The Strategy should commit to realising the benefits for local people, for the Eastern and Midland Region as a whole, and for the natural environment of increased wilderness.

While we welcome the content of the draft, it hasn't taken on the majority of the recommendations above. We propose that the final Strategy should reflect these recommendations.

## **Water Quality**

In our previous submission we said:

The implications of the Water Framework Directive became clear in the European Court of Justice's decision in the Weser case; all planning authorities are responsible for

incorporating the Directive's obligations into their decisions. The Strategy should set out how those obligations are to be implemented.

We agree with the incorporation of the Water Framework Directive into the Regional Policy Objectives (RPOs) insofar as it goes. However, we suggest that the RPOs should explicitly require that the test established in the Weser case be applied by local authorities in their planning decisions.

## **Understanding of the Circular Economy**

In our previous submission we said:

The issues paper refers to the Circular Economy in a number of regards which is welcome. The challenge now is to understand the implications of the circular economy for spatial planning.

Will the circular economy lead to less transport demand, contrary to the assumptions made at national level of increasing volumes of trade? What sort of clustering of economic activity will it lead to?

A low-carbon circular economy is profoundly different to the energy-intensive linear economy we have at the moment. Spatial planning for the circular economy is far more than simply reusing brownfield urban sites, welcome as that is. The Strategy should go as far as it can in setting out the principles of spatial planning for a circular economy and put in place a process which will ensure that the Assembly and local authorities can adequately engage with this important challenge.

The draft Strategy could better engage with the circular economy in a more prescriptive sense. We repeat the recommendations above and urge the Assembly to analyse how spatial planning policies and economic policies can help in the transition to the circular economy.

## **The National Transition Objective**

In our previous submission we said:

The issues paper looks ahead to 2020, 2030 and 2050. In December 2015 the Paris Agreement was adopted. In the same month, the Climate Action and Low Carbon Development Act set the pursuit and achievement of a low-carbon, climate resilient and environmentally sustainable economy by 2050 as a national transition objective and legally obliged the Government to plan and work towards it.

Therefore the RSES should set out the path to that decarbonised economy as it relates to spatial planning, land use and infrastructure.

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. What is particularly important for giving effect to both legal obligations is the comparative analysis of different emissions levels which would result from alternative strategies or alternative elements of the Strategy.

Unfortunately, this hasn't happened. The draft Strategy and SEA Report have failed to use the existing data and analytical techniques available to CODEMA, the Environmental Protection Agency and the National Transport Agency to carry out a quantitative analysis of greenhouse gas emissions from the Region and the different emissions levels which would result from alternatives. We consider that the Assembly is not complying with its obligations under the SEA Directive in this regard.

We recommend that the Strategy sets out explicitly

- that the implementation of all elements of the RSES is subject to quantitative analysis of greenhouse gas (GHG) emissions, and their consistency with the National Transition Objective, and
- that the Strategy requires that quantitative analysis is carried out of the GHG emissions of County/City Development Plans, Local Area Plans, and other plans under the RSES and that the RSES requires that these plans are consistent with the National Transition Objective.

## **Planning to reduce transport emissions**

In our previous submission we said:

The Strategy must set out a path towards a low-carbon transport sector including an approach to spatial planning which both relies on and supports low-carbon mobility.

In 2009 *Smarter Travel – A Sustainable Transport Future A New Transport Policy for Ireland 2009-2020* was adopted. In it the Government set out a policy for sustainable transport and set 5 targets:

To achieve these goals and to ensure that we have sustainable travel and transport by 2020, the Government sets the following key targets:

- Future population and employment growth will predominantly take place in sustainable compact forms, which reduce the need to travel for employment and services
- 500,000 more people will take alternative means to commute to work to the extent that the total share of car commuting will drop from 65% to 45%
- Alternatives such as walking, cycling and public transport will be supported and provided to the extent that these will rise to 55% of the total commuter journeys to work

- The total kilometres travelled by the car fleet in 2020 will not increase significantly from current levels
- A reduction will be achieved on the 2005 figure for greenhouse gas emissions from the transport sector.

Despite this Government Policy and the obligations of the Climate Action and Low Carbon Development Act 2015, a Transport Strategy for the GDA 2016-2035, which plans an increase of greenhouse gas emissions from the Greater Dublin Area of about 10% over the study period, was adopted in 2016.

The level of public transport, cycling and walking investment announced today in the NPF for the Eastern and Midlands Region will not of itself be enough to achieve the goals in Smarter Travel or the requirements of the Climate Act for transition to a low-carbon transport sector.

The RSES is thereby put in a difficult position. We recommend that in going beyond the NPF, the Strategy should adopt the following principles:

*Road investment should be restricted to investments which can be demonstrated to lead to reductions rather than increases in greenhouse gas emissions.*

*Provision for walking and cycling as the most cost-effective investments, and those with the greatest social and health benefits must be prioritised, using local authorities' own resources and development levy income as well as national funding.*

*Public transport investments must be greater than those planned in the NPF and must be supported by development levy incomes including special development levies.*

*Parking policies, standards, management and charges must support the modal shift in line with the Smarter Travel targets.*

(end of quote)

Firstly, we were mistaken in identifying that the Transport Strategy for the Greater Dublin Area plans an increase of 10% in greenhouse gas emissions over the period 2016 to 2035. In reality, the NTA now estimates that the Strategy will lead to an increase of 30% over the period 2012 to 2035 (compared to an increase of 32% if the Strategy was not implemented).

In relation to Smarter Travel, we note that the draft Strategy refers to it, but it doesn't explain it or set out its targets, not to mind seek to implement it in the RPOs. We recommend that there be a fundamental rethinking of the transport section of the RSES to be consistent with the Smarter Travel policy.

In relation to the recommendations we made at the previous stage:

- We again recommend that the road investment proposals be prioritised/restricted to those which can be demonstrated to lead to reductions not increases in GHG emissions. As discussed earlier, we consider that the lack of quantitative assessment of GHG emissions of these road proposals is in breach of the SEA Directive.
- We note that the walking and cycling objectives have not been identified as Regional Policy Objective and don't understand why this is. We believe that it is important that the public health significance of providing for walking and cycling should be highlighted.
- The need for parking policies to be consistent with the Smarter Travel targets.
- We recommend greater public transport investment, including the following:
  - Explicit support for the completion of the restoration of the Navan rail link;
  - Inclusion of the Metrolink loop running from Charlemont to UCD, Sandyford, Knocklyon, Tallaght, Rathfarnham and Terenure and back to Charlemont
  - Inclusion of Metro West
  - Commitment to bring forward further public transport infrastructure proposals as required to achieve modal shift and support rail-based development.

## **Enshrining the principle of planning around public transport nodes**

In our previous submission we said:

The flaw in the National Planning Framework is deeper than the unbalanced infrastructure expenditure. The lack of sustainable transport investment is matched in the Framework by a surprising lack of commitment to spatial planning oriented to public transport.

The skew of transport investment towards roads and the low level of investment in public transport is not new. But what is new and is surprising about the National Planning Framework, in contrast to planning orthodoxy over the last two decades, is that it does not see the rail system as the core of a decarbonised transport system. In fact, most of the rail lines outside Dublin get no mention in the Framework.

We need to ensure that people making longer trips have a convenient public transport option available to them. This is the reality of public transport in many parts of Europe, and further afield, in places where matching political decisions have been made

- to investment in public transport; and
- to direct development to locations well-served by public transport.

The RSES must reflect the long-standing policy consensus that growth should be directed to towns and neighbourhoods which have rail connections or which are going to be connected to the rail network. We need to ensure that we provide rail services to new development areas and that only areas with good rail links undergo large scale development.

We welcome the Guiding Principles for the Integration of Land Use and Transport in the draft Strategy. They cover the topics referred to in our previous submission in a clear and thorough manner. While we recognise the value of high-quality bus systems, because of the particular advantages of rail-based public transport systems in terms of quality and capacity, we suggest that the Guidelines should specifically highlight rail in this context.