

By email to: rses@southernassembly.ie

RSES Submissions
Regional Planning Unit
Southern Regional Assembly
Assembly House
O'Connell Street
Waterford
X91 F8PC

8th March 2019

Our Ref: SCP171204.2

Re. Draft Regional Spatial and Economic Strategy for the Southern Region and associated SEA Environmental Report

Dear Sir / Madam,

We acknowledge your notice, dated 18th December 2018, in relation to the Draft Regional Spatial and Economic Strategy for the Southern Regional Assembly (the RSES) and accompanying Strategic Environmental Assessment (SEA) Environmental Report.

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

We welcome the preparation of the RSES, which sets out how the commitments and objectives of the National Planning Framework (NPF) are to be realised within the Southern Region over the lifetime of the RSES. We acknowledge the extensive consultation and engagement undertaken by the Regional Assembly and the SEA team throughout the preparation of the RSES and we welcome that the feedback during consultation provided has been broadly reflected in the draft strategy and SEA Environmental Report. We also welcome that environmental sensitivity analysis was undertaken as part of the SEA process using the EPA-funded Environmental Sensitivity Mapping (ESM) tool.

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

The scale of the key environmental challenges facing Ireland should not be underestimated. Recent EPA reports show we will not meet our 2020 or longer-term targets on reducing greenhouse gas emissions. Water quality in rivers continues to decline¹, while 28 wastewater treatment plants serving large urban areas continue to fail to meet EU Standards². These reports clearly point to the need for more integrated land and catchment management practices, greater investment in infrastructure and accelerated action on climate change.

The NPF, if effectively implemented, will guide spatial planning in Ireland onto a more environmentally sustainable pathway and ensure that zoning and development is underpinned by adequate and appropriate infrastructure to protect the environment and public health. In finalising the RSES, there is merit in aligning the regional policy objectives more closely and more explicitly with the objectives and commitments in the NPF. The regional-level commitments relating to climate action and wider environmental protection could be strengthened and we include specific recommendations in this regard below.

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

General Comments and Recommendations

Overarching Environmental Regional Policy Objectives

In Chapter 2, we note the overarching 15 strategy actions proposed to build a strong, resilient, sustainable region. We welcome in particular

- action 4 (decarbonising transport sector and promoting cycling, walking),
- action 7 (strengthening/protecting natural and cultural/built heritage),
- action 8 (enhancing environment through sustainable development and transition to low carbon / climate resilient society),
- action 9 (infrastructure/services led development to ensure sustainable wastewater / environment resources)

We welcome that an integrated framework plan is being considered for the development of the key harbour /port areas within the region. In preparing these integrated framework plans, there is merit in adopting a collaborative approach such as that taken by the relevant authorities and key stakeholders in preparing and implementing the Shannon Integrated Framework Plan (SIFP). In preparing these plans, the requirements of the SEA and Habitats Directives should be fully considered. It is worth noting that while the SIFP for the Shannon Estuary is a non-statutory plan, it underwent SEA/ AA to coordinate the assessment of environmental sensitivities within the region. In addition, the approach adopted by Dublin Port Company for the Dublin Port Master Plan would be worth examining. This was carried out in collaboration with the port company and the local authorities. This plan was subsequently incorporated into local authority development plans by means of Variations.

¹ 'Water Quality in 2017 – An Indicators Report' (EPA, 2018)

² Urban Waste Water Treatment in 2017 (EPA, 2018)

While we note the objective in *RPO 118 – Green Infrastructure* to support LAs acting together to co-develop infrastructural management plans to enhance biodiversity, the RSES could consider including a stronger commitment to prepare a Regional Biodiversity Action Plan and commit to its implementation at a local authority level.

We welcome that the EPA-funded Environmental Sensitivity Mapping (ESM) tool was used as part of the SEA to assess the relevant environmental sensitivities within various key settlement areas. We expect the ESM Tool to be publicly launched in mid-2019. This tool has the potential to inform more evidenced-based spatial planning at regional and local authority level. You should consider including a commitment in the RSES to promote / encourage its use at local authority level as part of the development plan process. This would help reinforce the need to put the environment at the heart of land use planning. It should be noted however, that it is not intended for the tool to be used at a project level, given the level of detail used.

Regional Landscape Character Assessment

We welcome the intention to develop a regional landscape strategy (RPO 123). The timeframe associated with this should be provided also. We also recommend including measures to encourage local authorities to review their existing county landscape character assessments to ensure they are sufficiently up to date to inform future development over the lifetime of the RSES.

Ecosystem Services and Green Infrastructure

We welcome RPO 107, which commits to incorporating integrated planning for ecosystem services during the preparation of statutory land use plans in the region. This could be strengthened by highlighting the need for a “*green infrastructure first*” approach and provision of guiding advice on how to implement green infrastructure as part of development plans. Our current State of the Environment Report (2016) highlights that high quality green and blue spaces are important not just for nature but for peoples’ health & wellbeing, particularly in the context of an increasingly urban society and increasing settlement densities.

Transition to a Low Carbon & Climate Resilient Region

We welcome in Chapter 5 - Environment, the high-level regional objectives made in relation to decarbonisation in the electricity supply, heating, transport and agriculture sectors and alignment with national-level climate commitments (National Mitigation Plan and National Adaptation Framework).

To support these commitments, we recommend including a specific commitment for the Regional Assembly to prepare a *Regional Decarbonisation Plan* for the Southern Region, in collaboration with the new Climate Action Regional Office and other relevant key stakeholders within the lifetime of the RSES. This plan should consider and propose ambitious measures and targets for various sectors within the region to tackle climate change. It should align with the National Climate and Energy Plan (DCCAE, in prep), which represents a key element of the national effort to deliver on Ireland’s climate change commitments, and which will require effective implementation at a regional and local authority level. It should also align with other relevant sectoral and local authority climate plans. The inclusion of a graphic showing the hierarchy of relevant climate-related plans and their associated targets and commitments, would be a useful addition.

While we welcome that the RSES includes commitments in relation to improving building energy efficiency, energy conservation and the use of renewable energy sources, the inclusion of specific targets and timeframes for delivery of this at local authority level this would be welcome. Support for the promotion of *'sustainable buildings'* that achieve certification under systems such as the Home Performance Index (HPI) and Leadership in Energy and Environmental Design (LEED) at local authority level, would be a useful addition.

In relation to power generation, there is a need for an accelerated exit from coal and peat (including co-firing with biomass) for energy production. We would welcome if the RSES included commitments to support and promote innovative opportunities to maximise the potential of micro-generation. The National Development Plan includes an action to pilot *'climate-smart countryside'* projects, which could also be supported in the RSES. These are intended to establish the feasibility of the home and farm becoming net exporters of electricity through the adaptation of smart metering, smart grids and small-scale renewable technologies, for example, solar, heat pumps and wind.

We would welcome further support/commitments in the RSES to expand the re-fuelling infrastructure network for electric vehicles, to make it as easy for people to re-charge a vehicle as it is to fill up with diesel or petrol. Additional opportunities to encourage a higher level of ambition for decarbonising the public transport fleet (e.g. by going full electric) could be also promoted, particularly within the regional metropolitan areas.

Alignment with Other Key Plans and Programmes

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

Critical Water Service Infrastructure - Coordination and Integration

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

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

Recent extreme weather events have highlighted the vulnerability of our water supply infrastructure. The 2018 summer drought highlighted the need for additional headroom for the region, in the context of planning for population, industrial, tourism and economic development over the period of the RSES.

With 50% of national population growth targeted at '*large and smaller towns, villages and rural areas*' under the NPF, the RSES should promote sustainable management of wastewater in smaller towns, villages and communities, as well as outside the Irish Water network. An unsustainable increase in private treatment plants serving industry and housing estates in rural areas should be avoided.

One-off Housing

The RSES should ensure that one-off housing in non-serviced rural areas is tightly controlled within local authority land use plans and only permitted in areas where suitable drainage for domestic wastewater treatment systems can be achieved. We welcome RPO 24(e) which promotes serviced sites within the footprint of rural settlements over more remote one off housing. To drive the delivery of this, we recommend that a commitment is included in the RSES requiring local authorities to identify and prioritise a programme for the provision of serviced sites within smaller towns and villages within 1 year of the adoption of the RSES, where serviced sites can be provided. A commitment towards requiring a rolling two-year implementation plan be prepared by local authorities subsequently would also be welcome. This should be supported by specific targets and timeframes to drive its implementation. This will ensure the integrity and vitality of rural settlements is maintained, and impacts on rural landscape and the environment are minimised.

Sustainable Transport

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

In Section 2 – Regional Transport Strategy, there is merit in including a graphic illustrating the 'sustainable transport hierarchy', showing walking/cycling at the top and private car use at the bottom. This would serve to emphasise the re-prioritisation needed in transport planning and investment decision-making.

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

Greater emphasis is needed on the infrastructure necessary to support the uptake of electric cars, public transport usage and alternative fuels. The RSES should also consider behavioural change aspects and how it can do more to encourage commuters and others to move to low carbon transport options.

More sustainable options are also needed for freight transport across the region. We recommend that a separate strategy for freight transport is prepared. Given the presence of regionally important ports in the region, the risk to supply chains from extreme weather and climate should be considered as part of this.

Brownfield Redevelopment

We welcome the focus on brownfield over greenfield development and the inclusion of specific targets for this for both urban areas (RPO 8). This supports the NPF's vision and the core-strategy based approach to development. It also recognises the value of greenfield sites to human health, flood relief, amenity/recreation and as an ecological resource. Objective RPO8 would benefit however from including regeneration of brownfield lands in rural villages / settlements over greenfield also, where possible.

In prioritising brownfield development, it will be important that these areas, which may have legacy soil contamination issues, are subject to appropriate investigations and environmental assessments. Contaminated soil arising from urban regeneration should be managed in accordance with the relevant regional waste management plan.

RSES Implementation

Delivery of the RSES will require effective implementation of the Regional Policy Objectives at regional, county and local level. This will require a collaborative, partnership approach between the Regional Assembly and local authorities across the region. You should consider including an objective that commits the Regional Assembly to deliver, coordinate and be accountable for achieving the vision and ambitions of the Strategy.

In finalising the RSES, we recommend including a commitment to establish an implementation group to monitor and review progress in delivering the RPOs over the lifetime of the RSES.

We recommend also establishing an environmental subgroup to monitor how effectively the RSESs environmental commitments are being implemented at Local Authority level. Tracking of environmental performance could be linked with the EPA's 4-year *Ireland's Environment* reporting cycle and related annual topic (air, water, climate etc.) reporting by EPA and other authorities.

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

Finally, it would be useful, where possible, to include estimated timeframes for delivery of the key projects and lower-level plans under the RSES, along with the responsible authority(ies).

Future Amendments to the RSES

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

SEA Statement – “Information on the Decision”

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

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

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

Environmental Authorities

Under the SEA Regulations, you should also consult with:

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

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

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

Yours Sincerely,



Tadhg O'Mahony, Senior Manager
Office of Evidence and Assessment

Appendix I – Specific Comments on the RSES

Chapter 1 – Introduction

In Section 1.3 – *Section 3 – Regional Profile*, we note that the region has a strong network of urban centres, including three of the cities marked for significant growth, as well as thirteen large settlements (>10,000 people). We acknowledge the need to continue to build more compact urban settlements and to promote the regeneration of brownfield over greenfield developments where possible.

Chapter 3 People and Places

We acknowledge the inclusion of protection of the environment in objective RPO2. This could be strengthened by including reference to the need for environmentally sustainable development. In Section 3.5 Key Towns, we recommend amending the RPO 9 (e) to refer to “**environmentally sustainable**” development, rather than ‘sustainable development’ to further emphasise the need to put the environment at the heart of decision making.

In Section 3.7 Rural Areas, there is merit in including a commitment requiring Local Authorities to 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.

It would be useful to include information on the level of rural one off houses and any trend information between the last two census periods (2011 & 2016). This would serve to highlight the degree to which measures to discourage ribbon development and one-off rural housing are being implemented at the local authority level.

Chapter 4 – A Strong Economy – Innovative and Smart

Consider amending the text of RPO 38 - Regional Economic Resilience as follows “*To **sustainably development**, deepen and enhance our regional economic resilience....*”

In section 4.6, we note the various tourism assets within the areas. It is worth noting that Waterways Ireland have commenced a Tourism Masterplan for the Shannon Region, and Fáilte Ireland have commenced preparation of visitor experience development plans for the Burren & Cliffs of Moher, Three Heads and Dingle Peninsula areas, which should also be considered.

In *section 4.7 Place-making for enterprise development*, including an additional bullet point to incorporate, as appropriate, the DHPLG Building Heights Guidelines would be useful.

In *Section 4.9 – Marine and Coastal Assets*, we welcome Objective RPO 74, to ensure alignment and coordination between land and marine based planning to protect the marine environment.

It would be useful to also describe the environmental resources and protected marine species within the area, to ensure that the protection of these are incorporated into future planning decisions, in seeking to develop marine activities / technologies and the marine economy.

In seeking to enable and support the expansion of regional assets in the blue economy, particularly relating to gas and oil deposits within Ireland’s waters, the RSES should be mindful

to align with Ireland's national policy position on climate change. The impact on greenhouse gas emissions should be fully considered.

Chapter 5 - Environment

Mitigation

We acknowledge the commitment in RPO85 to implement national policy in relation to the national transition objective. We note the objectives related to decarbonisation in the transport sector (including support for investment in electric vehicle charging facilities), as well as support for decarbonisation in the agriculture sector and the waste sector.

We recommend including a target of no net increase in greenhouse gas emissions from development in the region, over the lifetime of the RSES.

In the subsection on 'Resource Efficiency' (p. 116), additional plans to consider include the Renewable Electricity Policy and Development Framework (DCCAIE, in prep.) and the Draft National Energy and Climate Plan. In RPO 94, we acknowledge the intention to support development of a regional renewable energy strategy. This should also consider the requirements of the SEA and Habitats Directives. Additionally, it would also benefit from being undertaken in tandem with regional landscape and regional green infrastructure and biodiversity action planning, to assist in identifying preferential areas for renewable energy developments, in an environmentally sustainable manner. Renewable energy developments should be required to be carried out in an environmentally sustainable manner and sited at appropriate locations.

Adaptation

With regards building resilience to climate change, while we note the support for flood risk management, other aspects should also be considered, such as more frequent storm events, prolonged periods of droughts / increased precipitation etc. In this context, the National Adaptation Framework (DCCAIE) would be useful to refer to and summarise what is required to adapt to climate change.

Further information could be included in terms of the climate-related risks facing the region and what the Regional Assembly proposes in terms of measures to address these, in collaboration with other stakeholders.

There is also merit in considering preparing a regional climate adaptation plan, in collaboration with the relevant climate action regional offices. This would assist in coordinating and aligning local authority climate adaptation planning within the region. It could also consider how regional growth and population increase can be achieved, while taking the necessary measures to adapt effectively to climate change.

Chapter 5 – Section 2 (Protecting conserving and enhancing our natural capital)

There would be merit in providing a summary table of the overall recommendations of the environmental assessment processes. This would also provide a clear link between the RSES preparation process and parallel SEA process.

Integrated Catchment Management

We welcome the support provided to the River Basin Management Plan (RPO115 & 117). We would welcome a commitment to support the work of the Local Authority Water and Community Offices (LAWCO) in promoting an integrated approach to catchment management as part of the implementation of the RSES.

Ecosystem Services

In relation to the subsection on 'ecosystem services', promoting an ecosystem services approach to non-statutory land use plans would also be beneficial. This should be supported by available (and where possible up to date) biodiversity and habitat mapping information.

Green Infrastructure

RPO 118 could also commit to preparing a regional green infrastructure strategy. This would serve to help protect biodiversity and inform development across many sectors within the region, as well as aligning with RPO 119 (Green Infrastructure corridors).

This subsection (and the RSES in general) should provide greater recognition of the wider benefits of a healthy natural environment, in addition to its role in supporting communities and the economy. It should more clearly reflect that the region has significant environmental resources and sensitivities that need protecting and careful management.

The RSES should promote the future development / expansion of greenways/blueways that are developed in an environmentally sensitive manner and in accordance with the relevant environmental assessments. The aim should be to maximise the co-benefits of greenways for the environment, economy and society, and avoid damage to sensitive species/habitats etc. Invasive species management and control are particularly important issues for greenways/blue ways and should be addressed in the proposed code of practice.

Biodiversity

RPO 122 commits to supporting the implementation of the All-Ireland Pollinator Plan; there are however a number of other significant national biodiversity-related plans in existence, including the National Biodiversity Action Plan and the National Raised Bog SAC Management Plan, which would equally merit supporting.

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

Landscape

We welcome the intention to develop a regional landscape strategy for the region, including regional landscape character assessment and mapping. We recommend that where possible, this should be completed within the lifetime of the RSES.

Chapter 6 - Connectivity

The RSES acknowledges in *Section 6.3* the need to integrate our transport and spatial planning policies. We note that this integration will be required over many different aspects, such as ports / airports, freight, urban, rural and interurban transport etc. We note the intention to develop a

separate freight transport strategy for the region. The requirements of the SEA and Habitats Directives should be considered, as appropriate in relation to these activities.

Chapter 7 – Quality of Life

In *Section 7.3 – Environment & Built Heritage*, we acknowledge that the RSES includes a commitment (Objective RPO 194), to support initiatives that enhance and protect natural and built heritage and biodiversity.

Chapter 8 – Water & Energy Utilities

Water Services

With regards planning for the provision of water services within the region, in the context of a growing population and climate change considerations, we acknowledge the alignment with Irish Water's National Water Resources Plan. Additionally, the relevant aspects from Irish Water's Capital Investment Plan could also be referred to, to highlight the current (and projected) ability of critical service infrastructure to accommodate population growth in settlements in the region.

We note that the RSES promotes that water services infrastructure investment and priorities are aligned with the spatial planning strategy, to ensure appropriate services are provided without exceeding the assimilative capacity of the receiving environment.

To avoid the over-zoning of development lands, the implementation of the Core Strategy approach to development should be maintained and phased according to the population and growth projects set out in the RSES and the National Planning Framework, and linked to the ability to provide the necessary critical service infrastructure.

In relation to the development of Key Towns, Smaller Towns, Villages and Rural Areas in the region, further growth / development should be in accordance with the principles of proper planning and sustainable development. Where EPA reports identify settlements in the region with issues relating to water quality and drinking water / waste water treatment infrastructure, these should be taken account of, as appropriate and relevant.

In relation to wastewater services infrastructure, the seasonal pressures on critical service infrastructure (such as from tourism) and climate change implications (droughts, storms, flooding) should be integrated as appropriate into the RSES.

Appendix II – Specific Comments on the SEA

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

Content of the Environmental Report

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

Environmental Baseline

Air

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

The latest air pollutant projections can be consulted at:

https://cdr.eionet.europa.eu/ie/eu/nec_revised/projected/envwzy_8a/

Greenhouse Gas Emissions

Recent information on greenhouse gas emissions can be consulted at:

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

Land Cover

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

Recent EPA Reports

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

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

Relevant plans, policies and programmes

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

Assessment of Alternatives

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

Mitigation Measures

We note the proposed mitigation measures and recommendations from the SEA (and AA) processes, summarised in Tables 9.1 through 9.5. All recommendations and mitigation measures arising from the SEA and AA processes should be reflected in the final RSES. Where any of the mitigation measures or recommendations put forward in the SEA Environmental Report or Natura Impact Report are not incorporated into the final RSES, appropriate justification should be provided.

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

Monitoring

We acknowledge the environmental monitoring programme, as described in Table 9.6. The SEA-related monitoring should be linked with the RSES implementation monitoring and reporting, to enable the effectiveness of the RSES in protecting environmental sensitivities to be evaluated.

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

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

Under Objective 5 Air Quality, an improvement in air quality trends is included in relation to emissions from transport of NO_x and PM. This should include reductions in emissions and ambient concentrations of NO₂, NO_x and PM₁₀ and PM_{2.5}.