By email to: transport2040@dttas.ie

Dr Claire Finn
Strategic Research and Analysis
Department of Transport, Tourism and Sport
Leeson Lane,
Dublin,
D02 TR60

5th March 2019   Our Ref: SCP190105.1

Re. SEA Scoping for Planning Land-Use and Transport – Outlook 2040

Dear Dr Finn,

We acknowledge your notice, dated 18th January 2019, in relation to the Planning Land-Use and Transport – Outlook 2040 (PLUTO 2040) strategy and the associated Strategic Environmental Assessment (SEA) Scoping 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 Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. Our comments focus in particular on the EPA's remit and areas of expertise as appropriate and relevant to the particular plan (in particular climate change, air, noise, water, waste, resource efficiency and the inter-relationships between these and other relevant topics e.g. biodiversity).

We welcome that one of the four key priorities of PLUTO 2040 is '*Realising a low-carbon, sustainable transport system in Ireland*'. Our heavily fossil fuel-dependent transport sector faces a number of challenges, including greenhouse gas emissions, air pollutant emissions, serious traffic congestion and noise pollution. With continued population growth, economic expansion and urbanisation expected over the lifetime of the National Planning Framework, it is vital that spatial and transport planning are more closely aligned to ensure that development is underpinned by the necessary transport and other critical infrastructure needed to protect the environment and public health. We need to rapidly decarbonise our transport system, reduce air pollution and transition to more sustainable modes of

transport. Achieving this will require a refocusing of priorities and investment decision making. The preparation of PLUTO 2040, which will set the long-term framework for transport investment over the next two decades, is therefore timely.

A number of comments and recommendations are provided below, in response to the questions posed in the Scoping Report. A list of environmental resources which may assist in carrying out the SEA is provided in Appendix I.

Responses to Scoping Questions

1. *Do you have any suggestions that you would like DTTAS to consider in the preparation of its Planning Land Use and Transport – Outlook 2040 (PLUTO 2040)?*

Governance & Implementation
There would be merits in clearly setting out the governance structure and clarifying what PLUTO 2040 can and cannot do. The inclusion of a diagram/figure showing the relation of the Strategy to higher and lower level plans in the transport planning hierarchy would be useful in this regard.

Given the scale of the transformation needed in the transport sector, strong and ambitious measures to promote sustainable transport are needed, backed up with the required investment and rigorous implementation. Commitments should be accompanied by measurable targets and timeframes for delivery. The Strategy should include be set timeframes for interim progress reporting and review, and progress reports should be made publicly available. The Strategy-implementation reporting should be linked with the SEA monitoring, to enable an evaluation of the environmental performance of the Strategy.

Sustainable Transport
To deliver its priority of '*Realising a low-carbon, sustainable transport system in Ireland*', PLUTO 2040 should seek to integrate land use and transport planning, extend public transport and park-and-rides, significantly expand electric vehicle recharging infrastructure, advance the electrification of rail, promote uptake of alternatives fuels for buses, freight and commercial vehicles, prioritize investment in walking and cycling infrastructure and seek to integrate green infrastructure networks. These priorities should be accompanied by measurable targets and timeframes for delivery.

The inclusion of a graphic illustrating the 'sustainable transport hierarchy', showing walking/cycling at the top and private car use at the bottom, would serve to emphasise the re-prioritisation needed in transport planning and investment decision-making in Ireland.

In preparing the Strategy, various mechanisms to support and promote active (non-motorised) forms of transport e.g. walking, cycling, should be explored. These have multiple co-benefits the environment, health and society and are relatively low cost. They also link closely with several of the UN Sustainable Development Goals. An example could include promoting a programme of Local Authority-led 'walkability' audits of 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.

Health & Well-being
Our transport system is highly fossil fuel dependent, resulting in significant emissions of greenhouse gases and air pollutants. It will be important to make the links between transport and health, in particular the effects of air pollution and noise. The links between traffic congestion/noise and quality of life/well being should also be recognised. There are also social / equality issues around accessibility e.g. access to employment opportunities, access to amenities etc., which link with the SDGs and which should be addressed in the Strategy.

Decarbonising Transport
The transformation needed to decarbonise our highly fossil fuel-dependent transport system presents a significant challenge. We welcome this is reflected as one of the four key priorities for PLUTO 2040. In setting the framework for transport investment out to 2040, it is vital that the Strategy reflects the national transition agenda and aligns with national and international commitments on climate change mitigation, as well as relevant transport sector climate plans. Given its importance to the framing and context of PLUTO 2040, the need to decarbonise transport could be acknowledged in earlier sections in the scoping report, for example *section 1.1 Background to PLUTO 2040* and *section 2.1 Need for PLUTO 2040*, as well as the Non-Technical Summary. Some additional key climate-related policies and plans to consider are outlined below in response to Question 4.

Climate Change Adaptation
In terms of increasing the resilience of both existing and future transport infrastructure to the effects of climate change, consideration should be given to other impacts in addition to flooding. This includes more extreme temperatures, soil erosion/landslides, coastal erosion, etc. which have potential to impact on our transport system.

Air Quality
In considering long-term transport planning to 2040, it will be critical that PLUTO 2040 takes account of and aligns with the objectives, actions and measures in the Clean Air Strategy and the National Air Pollution Control Programme.

DCCAE are currently finalising the National Clean Air Strategy, aimed at reducing air pollution and improving air quality. The Strategy intends to provide the strategic policy framework to identify and promote integrated measures across government policy, including transport, to reduce air pollution and promote cleaner air while delivering on wider national objectives such as climate change.

The National Air Pollution Control Programme, currently being prepared by DCCAE, will describe the pathway that Ireland will follow to achieve compliance with the National Emission Ceilings (NEC) Directive. It will set out policy options, actions and measures to achieve compliance with emission targets for five specified air pollutants (NOx, VOCs, Sox, PM2.5 and NH3) across sectors but in particular in the residential, transport, agricultural and energy sectors. It will address NEC emission targets for both 2020 and 2030.

Noise

Noise is now recognised as a serious environmental and health issue. The WHO identifies noise as the second most significant environmental cause of ill health (after air pollution). Transport is the leading source of noise nuisance. In providing the framework for transport investment over the next two decades, PLUTO 2040 should consider future trends in transport and mobility systems and predict the implications for the population's exposure to environmental noise.

The Environmental Noise Directive (END) requires the preparation of 'strategic noise maps' for major roads, railways, airports and agglomerations, as well as the development of action plans to reduce noise exposure. It also discusses the protection of 'Quiet areas' where people can find some respite from noise pollution, particularly in built up areas, in public parks or other quiet areas in an agglomeration, in quiet areas in open country, and near schools, hospitals and other noise-sensitive buildings and areas.

In Ireland, local authorities are required to develop noise action plans for transport related noise sources (major, road, rail and airports) and the two city agglomerations of Dublin and Cork. Round 3 noise mapping information is available on the EPA website at https://www.epa.ie/monitoringassessment/noisemapping/ and should be used to inform future transport planning and development. The need to protect designated 'quiet areas' should also be considered.

PLUTO 2040 should refer to and support the NPF's National Policy Objective 65: 'Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.'

The new Environmental Noise Guidelines published by the World Health Organisation should also be referred to and considered.

In addressing transport-related noise, the focus should not just be on finding an engineering solution, but on creating a preventative and management strategy through the provision of alternative, more environmentally friendly, and more attractive means of transport in our major urban locations, and for better routing and design of roads in our more rural locations.

Biodiversity

The importance of ecological corridors to both designated and non-designated flora and fauna merits recognition in the SEA objectives and assessment criteria. Transport infrastructure can contribute to and exacerbate habitat fragmentation and loss of connectivity, which should be avoided or mitigated where possible. The inclusion of policies/objectives for the development of green infrastructure, to enhance biodiversity as part of future transport development and upgrade of existing infrastructure, would be welcome. The Strategy could also recognise and seek to support the objectives of the All-Ireland Pollinator Plan, for example by promoting the inclusion of native, pollinator-friendly plant/tree species in planting/landscaping schemes.

Public Engagement

PLUTO 2040 should acknowledge the importance and value of public/community consultation and engagement and should pro-actively promote this for any projects arising out the implementation of the Strategy.

2. ***Do you have any comments on the approach to the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) for PLUTO 2040?***

In relation to the proposed SEA Objectives (Table 5.1) and SEA Assessment Criteria (Table 5.2), some comments and suggestions are provided below in response to Question 6.

In addition, we recommend including a summary of the SEA assessment key findings and recommendations as a specific section in the Strategy, to show how they have been considered in the Strategy. Where specific mitigation measures or recommendations are provided in the SEA (and AA), these should be reflected in the Strategy. Where any of the mitigation measures or recommendations put forward in the SEA Environmental Report or Natura Impact Report are not incorporated into PLUTO 2040, appropriate justification should be provided.

3. ***Chapter 3 sets out the current baseline environment conditions and future trends. The environmental issues are summarised in Table 3-2. Do you have any comments on these?***

In carrying out the SEA, useful baseline data sources/guidance may include:
- Our SEA GIS Tool allows public authorities to explore, interrogate and produce high level environmental summary reports. It is intended to assist in screening and scoping exercises. The tool is available through EDEN www.edenireland.ie
- The 'Climate Ireland' portal ([www.climateireland.ie)](www.climateireland.ie) provides information, support and advice to help public authorities to adapt to climate change and includes an Adaptation Support Wizard.
- Our WFD Application provides a single point of access to water quality and catchment data from the national WFD monitoring programme. The Application is accessed through EDEN https://wfd.edenireland.ie/ and is available to public agencies. Publicly available data can be accessed via the Catchments.ie website.
- Air Quality: You can access EPA air quality reports at: www.epa.ie/pubs/reports/air/quality/ and EPA air quality monitoring data at: www.epa.ie/air/quality/data/.
- Greenhouse Gas Emissions and Projections: EPA data on Ireland's annual greenhouse gas emission inventories and projections is available at: www.epa.ie/climate/emissionsinventoriesandprojections/
- Round 3 noise mapping information is at:
- www.epa.ie/monitoringassessment/noisemapping/
- The EPA maintains an 'SEA Spatial Information Sources' inventory on our website (last updated July 2018), which can be used to inform the preparation of the Environmental Report. Data sources/links include Air Quality, Climate, Biodiversity,

Flora, Fauna, Geology, Soils, Hydrology and Water Quality. The baseline data and sources referred to in Section 3 of the Scoping Report should be reviewed against this inventory.

- Baseline from the recent NTA Integrated Implementation Plan could also be integrated as appropriate. The assessment findings may also be useful to take into account for the different transport options being considered in PLUTO 2040.
- The 'GISEA Manual – Improving the evidence base in SEA' (EPA, 2017) may also be of assistance.
- OPW Flood Risk Management Plans and associated flood risk mapping is available at www.floodinfo.ie.

Section 3.2 Population, Human Health and the Economy, in the context of shifting demographics and settlement patterns, it would also be useful to also consider the aging nature of the Ireland's population (given the Strategy's 2040 horizon).

Section 3.4 – Biodiversity, Flora and Fauna – the potential for transport infrastructure to impact on ecological corridors/connectivity should be a key consideration. In addition, there is growing evidence and concern about the impact of transport-related air emissions (in particular nitrogen pollution) on ecosystems, which should also be considered.

Section 3.8 - Air Quality should reflect, as a key priority issue, the need for the transport sector to meet stringent new air emission reduction targets under the National Emission Ceilings Directive and the forthcoming National Air Pollution Control Strategy.

Section 3.12 – Climate Change should more clearly highlight, as a key issue, the need to decarbonise transport, and the scale of the transition needed. This section should also refer to the National Adaptation Framework 2018 (instead of the Climate Change Adaptation Framework 2012).

 4. ***DTTAS has reviewed plans, policies and programmes relevant to PLUTO 2040 in Chapter 4. Are there any others that should be considered?***

Links between PLUTO and other key policies/plans/programmes
The summary of the scope of the various plans, policies and programmes, provided in Appendix B, is useful. In some cases, the links/relevance to PLUTO 2040 could be clarified further. There is also merit in separating the various plans according to their position in the hierarchy, so that all national level relevant plans are contained with the same section. As a national-level Strategy, the links between PLUTO 2040 and other key national level plans would be important to highlight, to ensure alignment at a national level.

It would be useful to includes a schematic showing the linkages between PLUTO 2040 and other key plans, policies and legislation. This would serve to highlight the key significant plans/policies/legislation of relevance to the Strategy.

Under 'Land Use and Material Assets', the reference to the Regional Planning Guidelines should be removed and replaced with the Regional Spatial and Economic Strategies.

Some additional key plans, programmes and policies to consider are outlined under the headings below. In some cases, the plans listed below replace older plans referred to in Table 4.1 and Appendix B; these tables/sections should be reviewed and updated accordingly.

Other Transport Plans/Strategies
The Strategy should consider the Metropolitan Area Transport Strategies and Metropolitan Area Spatial Plans referred to in the National Planning Framework and Regional Spatial and Economic Strategies, as well as the Integrated Implementation Plan (NTA) for the Greater Dublin Area. The link between the aims of PLUTO 2040 and these lower-level plans would be important to consider.

The National Greenways Strategy may also be useful to consider, in the context of promoting a modal shift towards more active, sustainable forms of transport.

Key Air Quality Plans
As outlined above in response to Question 1, two key additional programmes/strategies to consider are the National Clean Air Strategy and the National Air Pollution Control Programme. The latter will set binding targets for reducing key air pollutants.

Climate Change Mitigation / Decarbonisation / Energy Plans
In relation to reducing transport-related GHG emissions and decarbonizing the transport sector, key plans to consider include the National Mitigation Plan (DHPLG, 2017) and the National Policy Framework for Alternative Fuels Infrastructure for Transport in Ireland 2017-2030.

Other relevant climate-related plans currently being prepared, which should be taken into account upon their adoption, include the National Energy and Climate Plan (DCCAE) (required under the European Commission's Clean Energy Package which sets the framework for facilitating the clean energy transition), the Renewable Electricity Policy and Development Framework, currently being prepared by DCCAE, and the forthcoming All-of-Government Climate Plan.

Climate Change Adaptation Plans
Important plans to consider are the Climate Change Adaptation Plan for the Transport Sector (DTTAS, 2017) and the forthcoming statutory Transport Sector Adaptation Plan required to be prepared by Sept. 2019 under National Adaptation Framework / Climate Action and Low Carbon Development Act 2015.

UN Sustainable Development Goals
PLUTO should be consistent with, and contribute to achieving, the UN Sustainable Development Goals. Ireland's SDG Implementation Plan (DCCAE, 2018) includes specific actions for the transport sector and should be referred to and integrated as appropriate. This is with a view to ensuring that PLUTO is framed within the context of the wider environmental protection and sustainable development agenda.

Tourism
Failte Ireland is currently preparing a 10 Year Strategic Plan, which may be useful to consider in the context of future tourism-related transport demand.

5. ***Do you have any comments or suggestions for the proposed approach outlined in Chapter 5 on considering alternatives for PLUTO 2040?***

Section 5.9 of the Scoping Report outlines that '*Other alternative approaches and scenarios for meeting PLUTO 2040 objectives will be developed for consideration and will be assessed against the objectives outlined in Table 5.2. This will consider looking at the different approaches for balancing PLUTO 2040 objectives within each of the five themes*'.

We recommend considering a tiered approach when preparing and assessing alternatives for the Strategy. This would also align with the approach taken in the NPF. We refer you to the EPA guidance document '<u>Developing and Assessing Alternatives in Strategic Environmental Assessment</u>'.

It will be important to clearly state what the alternatives are being assessed against, and for consistency in the appraisal approach. It will also be important to explain and document the reasons for choosing the preferred alternative.

6. ***Chapter 5 sets out the environmental objectives that will be used to assess PLUTO 2040 and its potential effects on the environment. Table 4.1 summarises these objectives. Have you any comments on these?***

Some comments and suggestions are provided below on the proposed SEA Objectives (and the associated SEA Assessment Criteria outlined in Table 5.2).

- *Population, Economy, and Human Health: Protect and enhance quality of life in relation to transport for people in Ireland while increasing accessibility to economic, employment and community facilities.*
Consider amending the proposed wording of this objective to better reflect the need to protect human health from transport-related air emissions and noise (not just quality of life). We also recommend removing the reference to 'economy', to reflect that the SEA should focus on the environmental (and related human health) aspects. Additional aspects such as cost may be taken into account as part of the alternatives assessment. OPW's Flood Risk Management Plans are an example of this approach, where all options which passed the assessment criteria (including positive cost benefit analysis) were then considered in the SEA.

- *Tourism and Recreation: Avoid damage to recreation areas and amenity facilities through construction of new transport infrastructure and support and enhance access for tourism and recreation.*
Wording could be amended to: 'Protect recreation areas …

- *Biodiversity, Flora and Fauna:* **'Protect and, where possible, enhance** *terrestrial, aquatic and soil biodiversity, particularly EU and national designated sites and protected species,* **and associated ecological corridors'.**

Consider amending the text as shown above, to provide protection for ecological corridors.

- *Cultural Heritage: Avoid damage to cultural heritage resources and their settings.*

Wording could be amended to: 'Protect cultural heritage….'.

- *Air Quality: Contribute to the mitigation of air pollution resulting from transport.*

Wording could be amended to: *'Contribute to the reduction of air pollution (and improvement of air quality) …'*

- *Water Environment: Prevent deterioration of the water quality status of surface water and groundwater bodies as appropriate to the WFD objectives and avoid increasing flood risk.*

Wording could be amended to: *'Support achievement of the objectives of the Water Framework Directive'.*

- *Climate Change (Mitigation): 'Minimise contributions to climate change (through greenhouse gas emissions) as a result of construction of new transport infrastructure or operation of existing and new transport networks'.*

The wording of this objective could be amended to better reflect the urgent need for the transport sector to dramatically cut its GHG emissions and decarbonise the transport network/fleet. The reference to 'existing and new transport networks' should be expanded to include both the operation and the upgrade of these.

Available Guidance & Resources

Our website (www.epa.ie/pubs/advice/ea/) contains SEA resources and guidance, including:
- SEA process guidance and checklists
- list of relevant spatial datasets
- topic specific SEA guidance, such as consideration of alternatives in SEA.

Good practice guidance on Integrated Biodiversity Impact Assessment and Developing and Assessing Alternatives in Strategic Environmental Assessment is also available.

State of the Environment Report – Ireland's Environment 2016

Our most recent State of the Environment Report (EPA, 2016) identified seven Key Environmental Actions for Ireland. We welcome that these key actions have been reflected in the SEA Scoping Report. Addressing and implementing these key actions, which are also linked to a number of the UN's Sustainable Development Goals, will be important in delivering environmental protection and promoting sustainable development in Ireland in the years ahead. It will ensure that future transport planning and investment is framed within the context of the wider environmental protection and sustainable development agenda.

Environmental Authorities

Under the SEA Regulations, you should also consult with:

- The Minister for Housing, Planning and Local Government

- Minister for Agriculture, Food and the Marine, and the Minister for Communications, Climate Action and Environment, where it appears that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment, and

- where it appears that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, the Minister for Culture, Heritage and the Gaeltacht.

The EPA welcomes the opportunity to comment at this stage of the Strategy and SEA process, and we will continue to engage as PLUTO 2040 and the SEA Environmental Report are progressed.

Should you have any queries or require further information in relation to this submission, please contact me directly.

I would be grateful if an acknowledgement of receipt of this submission could be sent to: sea@epa.ie.

Yours sincerely,

Tara Higgins

_____
Dr Tara Higgins
SEA Section, Office of Evidence and Assessment

Appendix I – Some Key Environmental Resources

Air Quality	http://www.epa.ie/air/quality/data/ (air quality data) http://www.epa.ie/pubs/reports/air/quality/ (air quality reports)
Biodiversity	http://www.npws.ie/guidance-appropriate-assessment-planning-authorities http://www.npws.ie/publications http://maps.biodiversityireland.ie/#/Home http://www.epa.ie/pubs/reports/research/biodiversity/
Climate	https://www.climateireland.ie http://www.epa.ie/pubs/reports/research/climate/ https://www.dccae.gov.ie/en-ie/climate-action
DHPLG Guidelines	https://www.housing.gov.ie/planning/development-management/planning-guidelines
EIA	https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal (new EIA portal)
Flood Risk	www.floodinfo.ie
Landscape Character Assessment	http://www.heritagecouncil.ie/
Noise Maps	https://gis.epa.ie/EPAMaps/ (round 3 noise maps)
SEA resources	https://gis.epa.ie/EIS_SEA/ (SEAGIS Tool) http://www.epa.ie/monitoringassessment/assessment/sea/resources/ (SEA resources and guidance)
Spatial Planning GIS	www.myplan.ie http://www.epa.ie/soilandbiodiversity/soils/land/corine/ http://gis.epa.ie/SeeMaps
State of Environment	http://www.epa.ie/irelandsenvironment/stateoftheenvironmentreport/
Water Quality	http://www.catchments.ie https://wfd.edenireland.ie/ http://www.epa.ie/pubs/reports/water/waterqua/
Waste Management	http://www.epa.ie/pubs/reports/waste/