

## ***Comhar* – the National Sustainable Development Partnership**

### **Comments on the draft Operational Programme for the Southern and Eastern Region, 2000-2006**

#### **Introduction**

*Comhar* welcomes the opportunity to comment on the draft Operational Programmes for the period 2000-2006. Given the short time which has been available to us for consideration of the draft OPs, these comments are not as comprehensive as we might have wished. However, we feel that a number of important issues need to be raised at this point.

Before commenting on specific aspects of this OP for the Southern & Eastern Region, there are a number of general comments which we wish to make. We have identified a number of general cross-cutting issues, common to all of the OPs, and have prepared a separate paper on these. The comments on this particular OP should be read on conjunction with those on the more general issues.

While we are commenting separately on the two regional OPs, we note that there is a significant amount of overlap between them. Many of our points, therefore, will relate equally to both Programmes. The extent of the overlap highlights, in our view, the need for careful integration of policies across OPs; this may require particular attention by the Monitoring Committees.

Owing to the short time available to us for consideration of the draft OPs, we have focused to a considerable degree on trying to identify major issues – including gaps or omissions – which need to be addressed in finalising this Programme. In some cases, it has only been possible to draw attention to general concerns, without time for elaboration. Were more time available, we might wish to draw attention to other issues also. If possible, we may address these at a later stage.

As we did not receive Annex 1 to the draft OP (i.e. the financial tables giving the proposed breakdown of the allocations under the Programme and sub-programmes), we have been unable to consider any financial issues. This lack of information has been particularly problematic in considering proposed investment under the waste management measure.

Finally, we believe that an important issue needing to be addressing in this particular OP is that it gives inadequate recognition to the characteristics of rural areas (remoter rural areas in particular) within the Region, because of the distorting effects of a higher degree of urbanisation on the regional statistics. We believe that it is very difficult to prescribe measures for such a disparate Region (e.g., the widely different needs of such areas as Tallaght and West Clare); indeed, to attempt to do so conflicts with the idea of local sustainability.

Specific comments on the text of the draft OP, and issues arising, are given below.

## **Chapter 2 Ex Ante Evaluation**

While the draft Programme includes an *ex ante* evaluation of the environmental position in the region and text in respect of environmental impacts of the individual measures, it should also include an overall eco-audit which brings together the environmental effects of the measures and identifies environmental policies, standards, etc., to be complied with.

### Environment

This section understates the range and extent of issues affecting the environmental quality of the region. In the overview section there is reference to “the relatively minor worsening” that has taken place, but the analysis fails to mention a number of areas of concern:

- (1) There is no mention of the impacts of tourism on the environment (other than a passing reference under archaeological heritage). Such impacts include:
- The impacts of very rapid increase in urban tourism – e.g. the growth in the short-stay market in Dublin with accelerated demand for new facilities including hotels, hostels, etc. with consequent impacts on the quality of the built environment;
  - Negative impacts of the Seaside Resort Tax Incentive Scheme which has had significant negative impacts on the quality of the built environment both within towns and villages and on the rural coastal landscape of parts of, e.g., Clare (Kilrush, Lahinch, etc.), Kerry, Cork (Youghal), Waterford, Wexford (Courtown, Gorey, etc.);
  - Impacts of individual holiday or second homes – on environmental resources and on community structure (price factors, closure in off-season, etc.);
  - Pressures on water and other resources, for example in congested tourism areas such as parts of Clare and Kerry;
  - Traffic impacts- both within congested centres such as Killarney, Skibbereen, etc., arising from large-scale developments or expansion of facilities in the rural landscape;
  - Landscape pressures (ecological, visual) e.g. the Burren; Wicklow uplands; and
  - Pressures on coastal habitats arising from proposed golf course developments (e.g. Doonbeg, Co. Clare) and other recreational uses.
- (2) There is no reference to any of the *negative* impacts of the Village and Urban Renewal measure under the previous OP (which include inappropriate development - loss of character, homogeneity, scale, over-development, etc.; inadequate incentives to re-use and rehabilitate older buildings). There is an assumption made that all impacts arising from the scheme are positive. The analysis does not give recognition to the intrinsic importance of retaining heritage but refers solely to economic factors.

- (3) There is no reference to the issue of dispersed housing and associated impacts on water resources, waste management, energy usage, and landscape quality.
- (4) There is no reference to impacts of forestry on water quality, archaeological heritage, and landscape quality.
- (5) The section on marine pollution makes no mention of the impacts of aquaculture on the marine environment, which is an issue of concern in a number of coastal areas in the region including, for example, Bantry Bay.
- (6) There is an assumption in the section on Natural Heritage (p.11) that designated sites and candidate Special Areas of Conservation are no longer under threat from development pressures. This is not in fact the case. Some of the pressures referred to are affecting proposed SACs. More explicit reference should be made to the importance of biodiversity, and how this can be supported through integrated policies.

The summary to this section fails to make reference to a number of significant issues including those outlined above. These omissions are carried forward into the remainder of the OP because of the inadequacy of the underlying assumptions in respect of both the quality of the existing environment and of the current pressures.

#### SWOT Summary of the Region

The summary of weaknesses in the Region omits any reference to congestion or environmental pressures arising from tourism – a significant issue in urban and rural areas as outlined above.

#### Role of the Regional OP

Explicit reference should be made to *public* transport (p.16).

### **Chapter 3 Local Infrastructure Sub-programme**

There is an assumption made on p.18 that dependence on roads equates with *private* transport.

Objectives (p.19) – should include explicit reference to public transport.

As above, no reference (p.20, 25) to intrinsic value of biodiversity (but is referred to on p.26 under environmental impact).

#### Non-national Roads Measure

We consider that the omission of reference to public transport in this measure needs to be rectified. It should not be assumed that investment in roads is solely for the benefit of private transport, or that roads measures should be designed primarily for private transport.

#### Waste management measure

The lack of detail on this measure is regretted, although it raises a fundamental point. While we recognise the need for investment in infrastructure for waste recovery and recycling, we feel there is a lack of an overall policy to underpin the OP, focusing in the first instance on waste prevention and minimisation. This priority in the internationally recognised hierarchy of options has to be promoted and implemented in an integrated fashion through national policy and measures (including, for example, legal, fiscal and educational measures). In the absence of such measures, the focus in the OP on recovery infrastructure is inadequate. It is also not clear, due to the lack of detail, what type of infrastructure is envisaged – e.g. will it extend to support for take-back systems, integrated with deposit/return for items such as drinks containers, which would encourage minimisation and re-use.

We also have some concerns that the measure is based substantially on the Waste Management Plans of local and regional authorities, which themselves are largely lacking in targets for waste prevention and minimisation. We are aware that these

Plans have given rise to significant public concerns in many areas about the potential use of incineration as a means of dealing with increasing production of waste. Apart from health concerns about incineration, it is regarded by many as contradicting the waste hierarchy in that it does not promote waste minimisation. The scant detail given in the draft does not allay concerns about the possible funding of incineration (which is sometimes described as a recovery measure) under the OP.

With regard to the reference to investment in hazardous waste landfill capacity, we would also point out that there is a need for research and monitoring of, and short-term safety measures for, old mixed landfill sites. The National Hazardous Waste Management Plan noted the existence of unknown numbers of old landfills where industrial and hospital waste was deposited; however, it is not clear to us that funding is being allocated to the necessary researching and monitoring of such sites.

#### Urban and Village Renewal Measure

This should have as its starting point the need for new measures to take account of the negative impacts of previous schemes, which we have already noted in relation to Chapter 2.

#### Sub-measure 4 – Habitat protection and conservation

This proposed measure could have seriously damaging impacts on National Parks and Nature Reserves. There is no acknowledgement of lessons learnt from the Mullaghmore (Burren) saga and others. Significant qualification is required – e.g. no development within such areas (within adjacent settlements only); funding for re-use of existing buildings, not new structures; etc.

#### Environmental Impact

This section needs to take account of the issues raised above.

Impacts on Poverty, Rural development

Public transport does not feature at all.

## **Chapter 4 Local Enterprise Development Sub-programme**

Tourism

The proposed measure does not take adequate account of the impacts of tourism on the environment. The various tourism sub-measures (1-5) should be integrated. No details are provided of proposed management measure. The proposed development of “major attractors” where none currently exist, and of significant clusters of attractions in less-developed tourist areas, may not be in accordance with the objectives of sustainable tourism and takes no account of the findings of the recent Pilot Initiative on Tourism and the Environment. Alternative approaches to tourism development are required in less-developed regions to ensure a sustainable product. Balanced spread of tourism is not necessarily the most appropriate response. Impacts of tourism on the Irish language as a community language must also be considered.

Other areas where issues of concern arise are forestry and aquaculture.

## **Chapter 5 Agriculture and Rural Development**

As a general comment, we wonder whether it is appropriate to continue to bracket these together in the manner presented. Rural development encompasses a much broader range of activities than agriculture, including tourism, micro-enterprise, etc., and therefore comes within the ambit of Chapter 4.

Environmental impact

The assumption that REPS has had a totally positive impact needs to be significantly qualified.

## **Chapter 6 Social Inclusion**

We have some concerns that the measures in this regard are so generally phrased as to be ineffective, and that practical measures are lacking in substance to meet the aspirations and strategies. It is also unclear whether some of the measures, which have been criticised when previously announced or used, will be adequate or effective in the new Programme.

Measures to combat social inclusion should be integrated into other sub-programmes in addition to those outlined. For example, low-income families could benefit from tourism with changes in the criteria for grants for accommodation and other facilities as well as changes in thresholds and investment requirements.

## **Chapter 7 Implementation**

We have commented separately on issues relating to the Monitoring Committees which are common to all OPs; these should be taken as applying to this OP also.