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A91 W20C

9th December 2020

Our Ref: SCP190904.3

Re. Draft Louth County Development Plan 2021-2027 and SEA Environmental Report

Dear Ms O'Hagan,

We acknowledge your notice, dated 14th October 2020, in relation to the Draft Louth County Development Plan 2021-2027 (the 'Plan') and SEA Environmental Report.

The EPA is one of the 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. For land use plans at county and local level, we provide a 'self-service approach' via our guidance document '*SEA of Local Authority Land Use Plans – EPA Recommendations and Resources*'.

This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority Land Use Plans. We suggest that you take this guidance document into account and incorporate the relevant recommendations, in finalising and implementing the Plan.



Louth County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Eastern and Midlands Regional Spatial and Economic Strategy.

Sustainable Development Goals & Key Actions for Ireland

Our State of Environment Report *Ireland's Environment - An Assessment 2020* (EPA, 2020) identifies thirteen Key Messages for Ireland which align with many of the UN Sustainable Development Goals (SDGs). Delivering Ireland's long-term sustainable development and environmental protection goals will require a concerted effort by government departments to address these key actions:

1. *National Policy Position for Ireland's Environment* - Recognition of the need for an integrated policy position given the many interlinkages and dependencies.
2. *Full Implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies*
3. Promote the benefits of a clean environment for health and wellbeing
4. Systematic change is needed for Ireland to become climate neutral and a climate resilient society and economy.
5. WHO clean air quality guideline values to be adopted within the Clear Air Strategy as specific targets to achieve.
6. Safeguard nature and wild places as a national priority to preserve its legacy for future generations
7. Improve the water environment and tackle water pollution water quality locally at a water catchment level.
8. Reduce human induced pressures on the marine environment
9. Move away rapidly from extensive use of fossil fuels to the use of clean energy systems
10. An agriculture-food sector that demonstrates validated performance around producing food with a low environmental footprint.
11. Drinking water and wastewater infrastructure must meet the needs of our society
12. Move to a less wasteful and circular economy where the priority is waste prevention, reuse, repair and recycle.
13. Promote integrated land mapping approaches to support decision making on sustainable land use.

Chapter 11 of the 2020 State of Environment Report focuses on environmental pressures from transport, understanding the drivers for these pressures and looking at the transformation towards sustainable mobility within the sector.

- The Plan should support the internationally recognised 'Avoid-Shift-Improve' hierarchy approach to changing our transport systems to more being more environmentally sustainable.



- Long-term, integrated spatial and transport planning can achieve compact development and move trips to rail, bus, cycling and walking. Ensuring that a long-term systematic approach to sustainable transport planning is established, implemented and supported by appropriate policies and measures.

The relevant aspects of these Key Actions and the SDGs should be taken into account in preparing the Plan and SEA and reflected in the principles/objectives/measures in the Plan. This will ensure that the Plan aligns with and contributes to achieving Ireland's sustainable development and environmental protection ambitions.

Comments on the Draft Plan

Sensitivity Mapping Webtool

The EPA funded Environmental Sensitivity Mapping webtool may be a useful resource to also consider in the context of identifying environmental sensitivities in the Plan area. This is available at www.enviromap.ie.

Blueways and Greenways

We note Strategic Objective SO7 and the development of a number of Greenways and Blueways, both within the Plan area and in conjunction with adjoining local authorities. We welcome the commitment that these initiatives will be the subject of relevant environmental assessments. There is also merit in the Plan promoting the need to be careful not to remove or degrade existing natural or existing green infrastructure, and potentially negatively impact on any designated European or national sites. Development of new greenways and blueways should support rather than replace existing green infrastructure. We refer to the recent HSE NUIG & UCD research reports and toolkits in relation to the health benefits of blue and green spaces. This toolkit could be used in the monitoring for the plan.

<http://www.epa.ie/pubs/reports/research/health/JS%20-%20NEAR%20Toolkit%20FINAL%20V1.6%201Oct20.pdf>

Content of the Environmental Report

Monitoring

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. Monitoring of both positive and negative effects should be considered. The monitoring programme should set out the various data sources, monitoring frequencies and responsibilities.

If the monitoring identifies adverse impacts during the implementation of the Plan, Louth County Council should ensure that suitable and effective remedial action is taken.

Guidance on SEA-related monitoring is available on the EPA website at <https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html>

Future Amendments to the Plan



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

SEA Statement – “Information on the Decision”

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

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan 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 Plan.

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

Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html>

Environmental Authorities

Under the SEA Regulations, prior to making your SEA determination you should also consult with:

- The Minister for Housing, Local Government and Heritage,
- The Minister for Agriculture, Food and the Marine, and the Minister for the Environment, Climate and Communications, 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,
- 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.

If you have any queries or need further information in relation to this submission, please contact me directly. I would be grateful if you could send an email confirming receipt of this submission to: sea@epa.ie.