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Ms Caroline Phelan  
Senior Planner  
Planning Department  
Galway County Council  
City Hall  
College Road  
Galway

12<sup>th</sup> February 2021

Our Ref: SCP210101.2

## **Re. SEA Scoping for Galway City Development Plan 2023-2029**

Dear Ms Phelan,

We acknowledge your notice, dated 9<sup>th</sup> February 2021, in relation to the Galway City Development Plan 2023-2029-Environmental Report Scoping Process (the 'Plan').

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 the 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 recommend that you take this guidance document into account in preparing the Plan and SEA. We also refer you to our Issues Paper submission, dated 1<sup>st</sup> February 2021, which we include, and which should also be taken into account, as relevant.

In preparing the Plan, Galway City 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 Regional Spatial and Economic Strategy for the Northern & Western Region.

### ***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.

Where relevant, aspects of these Key Actions and the SDGs should be taken into account in preparing the Plan to ensure that these align with achieving Ireland's sustainable development and environmental protection ambitions.

### **Specific Comments on the Plan**

#### *Biodiversity*

The Plan should include commitments to protect designated habitats and protected species (and associated ecological corridors/linkages) within, and adjacent to, the Plan area. The EPA has published guidance on [\*Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes. Best Practice Guidance\*](#). The aim of this guidance is to inform practitioners, plan/project proponents and consent authorities on integrating SEA, EIA and AA processes and requirements to streamline biodiversity considerations. This may be useful to consider in preparing the Plan and SEA.

#### *Invasive Alien Species Control and Management*

A clear commitment should be included to ensure that implementation of the Plan, in particular, any proposed development associated with the Plan, addresses the control and management of invasive species.

### *Critical service infrastructure*

In proposing and in implementing the Plan, you should ensure that the Plan is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.

### *Climate Action*

In preparing the Plan, you should take into account the need to align with national commitments on climate change mitigation and adaptation, including those set out in the *Climate Action Plan 2019*, as well as incorporating any relevant recommendations and measures in sectoral, regional and local climate adaptation and mitigation plans.

The Agency recently published [Ireland's Greenhouse Gas Emissions Projections for 2018-2040](#) (EPA, 2019) which should be taken into account in preparing the Plan, as appropriate and relevant.

The Agency has also published an update of the existing good practice guidance note on how to incorporate climatic factors into plans and programmes falling under the remit of the SEA Directive – [Integrating Climatic Factors into the Strategic Environmental Assessment Process in Ireland](#) (EPA, 2019). Key climate-related aspects to consider in the Plan and SEA include:

- Direct and indirect impacts of the Plan on greenhouse gas emissions and removals (Mitigation)
- Direct and indirect impacts of climate change on the implementation of the Plan, e.g. the resilience of critical water service infrastructure to flooding and drought (Adaptation)
- The linkages between mitigation and adaptation (inter-relationships).

### *Coastal Zone Management*

The Plan should include specific coastal zone management objectives and should consider future climate scenarios in terms of predicted higher sea levels and periods of increased frequency of storm conditions and associated flooding. The Plan should ensure the protection of ecological buffers/marshlands/estuaries, in order that the effects of coastal squeeze on protected species/designated habitats can be managed appropriately where possible. The role which estuaries and marshes play in terms of flood alleviation could also be highlighted.

### *Integration of transport & land-use planning*

The Plan should support the need for compact growth and better integration of transport and land-use planning, including walking and cycling infrastructure, public transport, park-and-ride facilities, etc.

### *Key Plans and Programmes*

Some suggested national / regional / sectoral plans to consider in preparing the Plan and SEA are listed below.

#### Spatial Planning

- Local Authority Development Plans

#### Sustainable Development

- National Implementation Plan for the Sustainable Development Goals

#### Tourism

- National Greenways Strategy
- Local authority tourism strategies

#### Climate

- Relevant sectoral, regional and local authority climate adaptation and mitigation plans/strategies – including Climate Change Adaptation Plan for Built and Archaeological Heritage (DCHG, in preparation).
- Relevant OPW Flood Risk Managements Plans and associated flood risk mapping
- National Climate Action Plan 2019
- National Energy and Climate Plan (DCCA, in preparation)
- National Mitigation Plan
- National Adaptation Framework

#### Biodiversity

- National Biodiversity Action Plan
- All Island Pollinator Plan
- Any available biodiversity/heritage plans and habitat mapping

#### Water & Water Services

- River Basin Management Plan for Ireland 2018-2021
- Water Services Strategic Plan / Capital Investment Programme and Draft National Water Resources Plan (Irish Water)

#### Transport

- Planning Land Use and Transport – Outlook 2040 (DTTAS, in prep)

#### Air & Noise

- Local Authority Noise Action Plans
- National Clean Air Strategy (DCCA, in prep)
- National Air Pollution Control Programme (DCCA, 2019)

### **Available Guidance & Resources**

Our website contains various SEA resources and guidance, including:

- SEA process guidance and checklists
- Inventory of spatial datasets relevant to SEA
- topic specific SEA guidance (including *Good practice note on Cumulative Effects Assessment* (EPA, 2020), *Guidance on SEA Statements and Monitoring* (EPA, 2020), *Integrating climatic factors into SEA* (EPA, 2019), *Developing and Assessing Alternatives in SEA* (EPA, 2015), and *Integrated Biodiversity Impact Assessment* (EPA, 2012))

You can access these resources at: [www.epa.ie/monitoringassessment/assessment/sea/](http://www.epa.ie/monitoringassessment/assessment/sea/)

### ***Environmental Sensitivity Mapping (ESM) Webtool***

The ESM Webtool is a new decision support tool to assist SEA and planning processes in Ireland. The tool brings together over 100 datasets and allows users to explore environmental considerations within a particular area and create plan-specific environmental sensitivity maps. These maps can help planners anticipate potential land-use conflicts and help identify suitable development locations, while also protecting the environment. The ESM Webtool is available at [www.enviromap.ie](http://www.enviromap.ie).

### ***EPA SEA WebGIS Tool***

Our SEA WebGIS Tool has been updated recently and is now publicly available at <https://gis.epa.ie/EPAMaps/SEA>. It allows public authorities to produce an indicative report on key

aspects of the environment in a specific geographic area. It is intended to assist public authorities in SEA screening and scoping exercises.

### ***EPA WFD Application***

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.

### ***EPA AA GeoTool***

Our AA GeoTool application has been developed in partnership with the NPWS. It allows users to select a location, specify a search area and gather available information for each European Site within the area. It is available at: <http://www.epa.ie/terminalfour/AppropAssess/index.jsp>

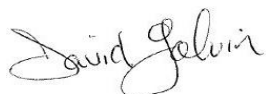
### **Environmental Authorities**

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency;
- Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (formerly Minister for Culture, Heritage and the Gaeltacht (functions transferred from Minister for Environment, Heritage and Local Government/ Minister for Housing, Planning and Local Government to Minister for Culture, Heritage and the Gaeltacht by S.I. 192 of 2011);
- Minister for Environment, Climate and Communications (formerly Minister of Communications, Climate Change and the Environment);
- Minister for Agriculture, Food and the Marine; 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

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](mailto:sea@epa.ie).

Yours Sincerely,



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David Galvin  
SEA Section  
Office of Evidence and Assessment  
Environmental Protection Agency