

Treanor, Bronagh

From: David Galvin [d.galvin@epa.ie]
Sent: 18 May 2018 09:24
To: ldevplan
Subject: Re. Draft County Monaghan Development Plan 2019-25 and SEA Environmental Report
Attachments: SCP 171002.2 EPA Sub Monaghan CDP 2019-25 LAP-comComments.pdf

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Ms Laura Nulty
Executive Planner
Monaghan County Council
The Glen
Monaghan

SCANNED

18 May 2018

Our Ref: SC171002.2

Re. Draft County Monaghan Development Plan 2019-25 and SEA Environmental Report

Dear Ms Nulty

The Environmental Protection Agency (EPA) acknowledges your notice, dated 15th March 2018, regarding the Draft Monaghan County Development Plan 2019-25 (the Plan) and the accompanying Strategic Environmental Assessment (SEA) Environmental Report.

The EPA is one of five statutory Environmental Authorities under the SEA Regulations. Our role in SEA focuses on promoting full integration of the findings of the SEA into the Plan and advocating that the key environmental challenges for Ireland are addressed, with a priority focus on key national and regional plans. It is not the function of the EPA to either approve or enforce the Plan or SEA. A number of key aspects to be considered are outlined below and should be taken into account in finalising the Plan and SEA ER.

Specific Comments on the Plan

Core Strategy

We note the proposed zoning of c134ha of residential lands within the County. It would be useful to describe the proposed zoning in the context of consistency with key high level plans such as the National Planning Framework – Ireland 2040, Relevant CFRAMS etc. A commitment should be made to ensure that the relevant policies and objectives of the Regional Spatial Economic Strategy for the Northern and Western Region are taken into account, upon its adoption.

Infrastructure

We note the many infrastructural projects referenced in the Plan including residential, industrial and infrastructural development, transport, water supply, waste water etc. All proposed development should be planned and implemented in accordance with the requirements of the EIA, Habitats, Floods and Water Framework directives. This should ensure that environmentally sensitive areas which may be impacted are assessed and appropriate environmental protection, management and mitigation measures are put in place and implemented.

The proposed zoning should be linked to the ability to provide adequate and appropriate critical service infrastructure, including water and wastewater infrastructure. The requirements of the Planning System and Flood Risk Management Guidelines (OPW, DEHLG, 2009), should also be fully implemented to ensure that any proposed development / land use zoning is appropriate to the level of flood risk identified.

Local Area Action Plans

The adoption of 'Local Area Action Plans' and the intention to prepare others in order to direct sustainable development at specific strategic sites is noted, as is *Table 9.14 Objectives for Local Area Action Plans*. Where relevant, the Plan and SEA ER should highlight the need to adequately remediate any contaminated soils/material/groundwater that may be identified in implementing Local Area Action Plans.

Transition to low carbon climate resilient economy and society

The EPA's most recent State of Environment Report *Ireland's Environment – An Assessment 2016* highlighted the need for urgent action to address climate change and to move Ireland towards a low carbon, climate resilient economy and society. Appropriate climate change adaptation and mitigation measures should be included in the Plan. The Plan should also align with the objectives and commitments of the National Policy Position on Climate Action and Low Carbon Development, the National Mitigation Plan (DCCA, 2017), the National Adaptation Framework (DCCA, 2018) and the National Planning Framework (DHPLG, 2017), as well as relevant sectoral, regional and local adaptation plans.

The EPA has published guidelines to support local authorities in developing local climate adaptation strategies (EPA, 2016^[1]). The 'Climate Ireland' website provides information, support and advice to help local authorities, sectors and government departments to adapt to climate change and includes a Local Authority Adaptation Support Wizard. It can be consulted at www.climateireland.ie.

Intensive Agriculture

In the context of the intensive nature of much of the farming activity in Co Monaghan. 8.7 *Intensive Agriculture and Land Spreading of Manure and Sludge* and *AGP2 Intensive Agriculture/Poultry and Pig Farming* are noted. Ireland's Environment-An Assessment 2016 Report (EPA 2017) identifies the significant risk that agriculture poses in the context of meeting future public and environmental health requirements for good quality water. It is important that the catchment management approach to protect and manage our waters, advocated in the River Basin Management Plan for Ireland, is integrated into the Plan and implemented within the County, as relevant and appropriate. This is particularly important in areas of intensive agricultural activity.

The additional information required in Policy AGP2 for assessing applications for intensive poultry units or similar specialised agricultural developments, is noted. We also note that Policy *AGP2* includes reference to the measures contained therein being additional to *Policy AG01*, however *Policy AG01* is not referenced elsewhere in the Plan. Where relevant and appropriate, there is merit in further detailing the mitigation objectives of *Policy AG01*.

European Union INTERREG Programme

The Plan references various individual project funding streams under the European Union's INTERREG Programme. The Plan could consider including a summary of how the aims and objectives of the INTERREG V Programme (2014-2020) are to be integrated into the Plan, and including a reference to this programme in the list of plans / programmes / strategies listed in *Appendix 1 Relationships with Legislation and other Plans and Programmes*.

In assessing transboundary aspects of the Plan, the following should also be taken into account:

- EU Programme for Peace and reconciliation in Northern Ireland and the Border Region of Ireland for 2014-2020 (PEACE IV)
- SONI Transmission Development Plan for Northern Ireland 2018-2028

Specific Comments on the SEA Environmental Report

Non-Technical Summary

We note that the Non-Technical Summary (NTS) of the Plan is included as an appendix and is titled *1a-Strategic Environmental Assessment Appendix*. To provide clarity and reflect the importance of the NTS as a non-technical reference, we recommend that it be included as part of the main SEA Environmental Report and is titled *Non-Technical Summary*. There is also merit in including *Table 10.1 Selected Indicators, Targets and Monitoring Sources* in the Non-Technical Summary.

Scoping Submissions

It would be useful to include in Section 3.4 Scoping a summary of the key environmental considerations identified in submissions received at the scoping stage of the Plan.

Climate Change Mitigation and Adaptation

The climate-related Strategic Environmental Objective (C1) in *Table 5.1 Strategic Environmental Objectives, Indicators and Targets* is specific to transport. Consideration should be given to reflecting other wider aspects of climate change mitigation and adaptation in the strategic environmental objectives set out for the Plan. We further recommend that the SEA ER should include a section outlining how climate change mitigation and adaptation measures have taken into account in preparing the Plan.

Mitigation

We note, in *Table 9.1 Integration of Environmental Considerations*, the inclusion of detailed information on the possible environmental effects of implementing the Plan. It would be also useful to describe how the full range of likely significant effects (Schedule 2B (f) of SI 436/2004) have been considered.

Environmental Baseline

We welcome the inclusion of *Section 4.11 Overlay of Environmentally Sensitivity Mapping* and *Figure 4.14 Overlay Mapping of Environmental Sensitivities*. It would also be useful to consider taking into account any areas at risk from high levels of radon.

Greenway Development

In relation to the development of new and existing greenways referred to in the Plan, the National Greenways Strategy currently being prepared by the Department of Transport, Tourism and Sport should be taken into account.

Habitat/Green Infrastructure Mapping

Any available habitat/green infrastructure mapping of the Plan area should be considered in the context of the protection of biodiversity and associated ecosystems. Where habitat/green infrastructure mapping is not available, a commitment to undertake such mapping within the lifetime of the Plan would be welcome. This will assist in ensuring that land use planning and associated development is informed by up to date habitat mapping related data

Monitoring

We note the inclusion of *Table 10.1 Selected Indicators, Targets and Monitoring Sources*. The Monitoring Programme should be flexible enough to take account of specific environmental issues as they arise. The programme should monitor both positive and negative effects and be designed to allow possible cumulative effects and unforeseen adverse effects to be identified and responded to as appropriate. There is also merit in linking the SEA monitoring/reporting with the Plan review and reporting. This will provide an opportunity to monitor and assess the effectiveness of the mitigation measures.

Future Amendments to the Plan

Where amendments to the Plan are proposed, these should be screened for likely significant effects in accordance with the criteria set out in *Schedule 2A* of the SEA Regulations (SI 436 of 2004) and should be subject to the same method of assessment applied in the “environmental assessment” of the Plan.

SEA Statement – “Information on the Decision”

Following adoption of the Plan, an SEA Statement, should summarise the following:

- 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.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned.

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

Yours sincerely



David Galvin
Scientific Officer
SEA Section
Office of Evidence and Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork

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^[1] http://www.epa.ie/pubs/reports/research/climate/EPA_Research_Report164.pdf



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¹ http://www.epa.ie/pubs/reports/research/climate/EPA_Research_Report164.pdf



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