

Mr Graham Doyle
Secretary General
Department of Housing, Local Government and Heritage
Custom House, Dublin 1, D01 W6X0

Email strategy@housing.gov.ie.

11 May 2023

EPAC Reference No: 0623

Re: Department of Housing, Local Government and Heritage – Statement of Strategy 2023-2025

Dear Mr Doyle

The Environmental Protection Agency (EPA) welcomes the opportunity to submit our views on the proposed updated Statement of Strategy for the period 2023-2025 for the Department of Housing, Local Government and Heritage (DHLGH).

The following recent submissions to DHLGH should be considered in conjunction with this letter:

Submission on NPWS Draft Strategy Statement [LINK](#)

Submission on 4th National Biodiversity Action Plan [LINK](#)

Submission on Marine Strategy [LINK](#)

Submission on draft River Basin Management Plan [LINK](#)

Submission on draft 5th Nitrates Action Plan [LINK](#)

Submission on Arterial Drainage [LINK](#)

A healthy environment is fundamental to our economy and our health and wellbeing. This updated strategy, the current programme for Government and the forthcoming National Planning Framework review provides significant opportunities to integrate environmental protection across our planning, local government, water protection, biodiversity and heritage services.

Ireland has declared climate and biodiversity emergencies. It will be important that concrete actions to address these emergencies are integrated into all areas under the DHLGH's remit; for example, through the protection of water and biodiversity, and through planning, local government and housing policies. The main aspect from a climate

perspective is the need to ensure that the policy areas, plans and frameworks within DHLGH's remit are all fully integrated – biodiversity, water, and planning, to ensure that they are all mutually supportive and co-beneficial. The Strategy should identify how it will support the achievement of Climate Action policy objectives into the future. The integration of climate considerations should be significantly strengthened to better reflect the interconnected nature of the pressures on water quality and the drivers of greenhouse gas emissions. The EPA sees significant potential to achieve water quality outcomes through the targeting of climate measures.

One of the key recommendations in the EPA's 2020 State of Environment Report is that there needs to be an overall 'All of Government' vision for protecting and managing our environment into the future. DHLGH's responsibility for local government is a critical element in relation to this, given the importance of local authorities in the implementation of environmental legislation and policies in the State. In this context, the Department should set out how it will support the local authorities to deliver on their critical roles in environmental regulation to protect the environment and public health.

The role that the Department has in relation to implementing elements of UN Sustainable Development Goal (SDG) number (14) is outlined in the Strategy. The EPA suggests that the Department also has lead roles in relation to a number of the sub-tasks under SDG 1, 6 & 11 and also have supporting roles in SDG 15 and recommends that this should be highlighted to in the updated Statement of Strategy.

In preparing this response we have considered your existing strategic goals (A to F) and make the following specific comments.

Strategic Goal A: Sustainable housing system

The existing Statement of Strategy does not refer to the Department's roles and responsibilities under the National Radon Control Strategy. Radon is the second most important cause of lung cancer in Ireland giving rise to 350 new cases of cancer each year. It is important that the actions of the Department to address this public health risk are set out clearly in the Statement of Strategy. The technical guidance to prevent radon in new buildings is a critical element in national action to protect citizens from this modifiable cancer risk. Recognising that primary prevention in new builds is the most cost-effective way to reduce radon levels, opportunities to strength the radon preventive measures in new builds should be promoted by the Department over the lifetime of their strategy. Moreover, the EPA suggests that actions under Strategic Goal A should be considered to determine if there is any modification that can be made to them to enhance protection of citizens from unnecessary radon exposure. Other actions assigned to the Department under the National Radon Control Strategy should also be included into the Statement of Strategy such as provision of radon prevention training courses.

Strategic Goal B: Sustainable management of water resources

The recent EPA Water Quality in Ireland 2016-2021 report highlighted that 46% of Ireland's surface waters are in moderate, poor or bad ecological status. Despite the actions taken under the 2nd cycle River Basin Management Plan, water quality is not improving.

In finalising the 3rd cycle River Basin management plan it is essential that the measures in the final Plan are fully resourced and implemented and that the Plan is monitored, tracked and adapted if necessary to improve water quality. The EPA recommends in finalising the programme of measures for the plan that consideration should be given to actions that address not only water quality but climate adaptation and wider biodiversity challenges in an integrated fashion.

EPA fully supports the goal to ensure full transposition and implementation of all water related EU directives and the resolution of EU infringement cases on Water.

EPA Drinking Water reports over many years have found that the compliance with drinking water standards in group schemes and small private supplies is substantially poorer than in public water supplies. In this context, EPA acknowledges the urgent need to complete the review of the rural drinking water services with a view to eliminating drinking water quality failures in rural waste supplies. In relation to public drinking water, EPA recognises the role of the Department in leading the implementation of the national lead strategy. EPA recommends that a progress report on implementation of the strategy be published and that this is explicitly committed to within the Statement of Strategy.

With respect to urban wastewater, EPA sees it as essential that investment in wastewater infrastructure should be prioritised to focus on compliance with the Urban Wastewater Treatment Directive, ensure elimination of untreated discharges and mitigation of significant pressures identified under the Water Framework Directive.

Strategic Goal D: Planning

A strong regulated offshore planning system is vital to ensure sustainability is achieved across the many sectors (fisheries, energy, transport) involved in the marine space. This will involve coordination and collaboration with many different stakeholders, at national, regional and local level. In light of this having clear governance structures established, monitored and implemented effectively will be critical, to avoid conflicts arising in implementing plans, programmes and policies relating to the marine environment.

Strategic Goals E/F: Climate Change & Biodiversity

EPA recommends that the Department consider what actions are needed to bring Ireland into compliance with the requirements of the Habitats and Birds Directive and incorporate these actions into the strategy table.

The NPWS is an important stakeholder of the EPA with whom we cooperate and coordinate on several work areas in the interest of protecting Ireland's environment. With respect to the NPWS, EPA notes the publication of the strategic review of the service and the commencement of implementation of actions arising. The EPA suggests that progress with the implementation of the actions from the NPWS strategic review should be a key element of the updated Departmental strategy. The recent national land use review made recommendations of relevance to Biodiversity management and EPA recommends that the department reflect these within the statement of strategy. Similarly, the recommendations of recent report of the Citizens Assembly on Biodiversity Loss should be considered in finalising the strategy of the department.

EPA notes that the Department intends to increase the area of marine protected areas with a view to achieving 30% of Ireland's maritime area being protected by 2030¹. The statement of strategy should set out the steps that will be taken to achieve this target (including the planned Marine Protected Areas Bill) alongside interim targets for protected areas within the lifespan of this statement of strategy.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Micheál Lehane', written over a horizontal line.

Micheál Lehane

Director

Office of Radiation Protection and Environmental Monitoring

¹ gov.ie - Ireland announces major boost in marine environmental protection to coincide with COP15 (www.gov.ie)