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20 August 2024

EPAC Reference No -1124

**Re: Department of Housing, Local Government and Heritage – Statement of Strategy 2024-2026**

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 2024-2026 for the Department of Housing, Local Government and Heritage (DHLGH).

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 (NPF) update provides significant opportunities to integrate environmental protection across our planning, local government, water protection, biodiversity and heritage services. A more detailed submission on the NPF will be made in the coming weeks as part of the on-going consultation.

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.

### **Strategic Goal A: Sustainable housing system**

As stated in our submission to the previous Statement of Strategy 2023 – 2025 [Link](#), the strategy does not refer to the Department's roles and responsibilities under the Government's National Radon Control Strategy (NRCS). Radon is a serious public health issue, and it is estimated that exposure to radon causes 350 lung cancer cases each year in Ireland. It is the greatest source of exposure to ionising radiation for people living in Ireland. It is important that the actions of the Department to address this public health risk are set out clearly in the Statement of Strategy recognising that primary prevention in new builds is the most cost-effective way to reduce radon levels. The NRCS actions related to the private rental sector aimed at reducing exposure of renters to the radon in private rented accommodation which should be encompassed within the Statement of Strategy.

### **Strategic Goal B: Sustainable management of water resources**

The recent EPA Water Quality in 2023 report noted that water quality in Ireland is not improving overall and nutrient levels remain too high in a large proportion of water bodies. The biological health of our rivers and our lakes have shown small net declines. While some improvements are being made these are being offset by declines elsewhere [EPA-Water-Quality-Indicator-Report-2023-web-11June2024.pdf](#) While many efforts are being made to address the main pressures and stressors on water quality it is imperative that the next River Basin Management Plan is published without further delay. 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.

The 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. The 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 detailed submission on the revised National Planning Framework will be made by the EPA in the coming weeks as part of the on-going consultation.


**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.

Yours sincerely,



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Andy Fanning

Programme Manager, Office of Radiation Protection and Environmental Monitoring