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Our Ref: SCP220302.2

Re. Draft National Cycle Network Plan and SEA Environmental Report

Dear Mr Bowen,

We acknowledge your notice, dated 6th May 2022, in relation to the Draft National Cycle Network Plan (the 'NCN') and accompanying SEA Environmental Report.

This submission is comprised of four parts, viz, this cover letter addressing high-level review observations, and three Appendices: with Appendix I providing specific comments on the SEA Environmental Report and overall SEA process; Appendix II providing specific comments on the NCN; and Appendix III referencing relevant chapters in the recent Ireland's Environment - An Integrated Assessment (SOER2020) as considered relevant to 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 strategic 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.

Overview

The EPA recognises the importance of promoting and implementing a shift to more sustainable modes of transport, including cycling. The transport sector is responsible for 20% of Ireland's greenhouse gas emissions. It is important that the NCN provides an adequate, connected cycle network to contribute to the transformational shift to sustainable modes of transport, while also recognising the need to protect green and blue spaces as they provide spaces for communities and enable a connection to nature. The NCN should implement and promote the multiple benefits of this transport management plan for air pollution, noise mitigation, wellbeing and climate action.

Integration

A key element of effective Strategic Environmental Assessment is to ensure that the key environmental issues, mitigation measures and any recommendations from the SEA Environmental Report are integrated into the plan. In the case of the NCN the SEA Environmental Report states that due to the high-level nature of the cycle corridors proposed for the NCN, it is not possible to propose specific mitigation measures for each corridor. While this may be the case, the SEA Environmental Report could, however, refer to tiering in environmental assessments. I refer you to the EPA funded research project “[Tiering in Environmental Assessments](#)¹” and the associated guidance document with the research. The research identifies that SEAs and their associated plans should provide guidance, mitigation and monitoring recommendations for lower tier environmental assessments, i.e. environmental impact assessments (EIAs).

The NCN would benefit from the inclusion of a section or chapter related to “Environmental Assessment” showing how the assessment process and the SEA recommendations have been integrated into the NCN. In particular, the NCN should include clear commitments to implement the recommendations, mitigation measures and monitoring arrangements identified in the SEA.

Water Framework Directive

Hydromorphology is the second most significant pressure on water quality in Ireland. This pressure relates to damage to habitat and natural river or lake processes through physical modification. Examples of such modifications include morphological changes such as river channel alteration, and hydrological modifications such as surface water abstraction.

The NCN should be cognisant of the potential for any developments within the riparian zones beside waterways, including cycleways, to permanently alter river riparian habitat and thus have a significant and lasting impact on the hydromorphology of a water body.

The NCN should also ensure the wider WFD objectives are adhered to and not compromised during implementation.

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

Yours Sincerely,



Dr Brian Donlon
Senior Scientific Officer

¹<https://www.epa.ie/publications/research/epa-research-2030-reports/research-391-tiering-of-environmental-assessment--the-influence-of-strategic-environmental-assessment-on-project-level-environmental-impact-assessment.php>



Office of Evidence and Assessment

Appendix I: SPECIFIC COMMENTS ON THE SEA ENVIRONMENTAL REPORT

General Comments

As a general comment, the layout of the SEA ER would benefit from being reorganised to follow the flow of information listed in the *Schedule 2* of the SEA Regulation (S.I. 435 of 2001, as amended). For example, the assessment of the baseline information and the relationship between the NCN and other plans and programmes would merit inclusion in the main body of the report rather than as appendices.

Non-Technical Summary

In accordance with *Schedule 2 Information to be contained in the Environmental Report* of the SEA Regulations (S.I. 435 of 2001, as amended) the SEA Environmental Report should include a non-technical summary. The non-technical summary should include a summary of the information listed under *Schedule 2, (a) – (i)* of the aforementioned regulations.

Scope/geographical coverage of the NCN plan

The scope refers to setting out a coordinated network of cycle corridors connecting settlements of 5,000 inhabitants or more. Both the SEA ER and the NCN should take account of future projections of population growth, and in particular specific areas where it is expected that settlements will exceed 5,000 inhabitants within the lifetime of the plan. The National Planning Framework and the Regional Spatial and Economic Strategies may be of assistance in this regard.

Alignment with Plans & Programmes

TII should ensure that the NCN aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments. The NCN should be consistent with the Climate Action Plan 2021 and draft River Basin Management Plan 2022-2027.

In addition, the NCN must be consistent with the National Planning Framework (in particular National Policy Objectives 22, 27 and 46²) and the three Regional Spatial and Economic Strategies.

Furthermore, the SEA Environmental Report and the NCN would benefit from the inclusion of a schematic showing the relevant plan hierarchy for EU and national transport related plans, e.g. the European Green Deal, National Investment Framework for Transport in Ireland, etc. This would help identify areas which need closer coordination and integration.

We welcome the inclusion of the reference to the UN Sustainable Development Goals (SDG) in the SEA Environmental Report. There would be merit in discussing the relevance of particular goals and their links with the NCN. In particular, Goal 3: Good Health and Wellbeing, Goal 11: Sustainable Cities and Communities and Goal 13: Climate Action, could all be discussed to provide clarity on the relationships between the NCN and these SDGs.

² NPO 22 relates to facilitating tourism development, in particular a national greenways, Blueways and Peatways Strategy, which prioritises projects on the basis of achieving maximum impact and connectivity at national and regional levels; NPO 27 relates to ensuring the integration of safe and convenient alternatives to the car in design of communities, by prioritising walking and cycling accessibility to both existing and proposed developments, and integrating physical activity facilities for all ages; NPO 46 relates to cross border co-operation with relevant departments in Northern Ireland to ensure enhanced transport connectivity between Ireland and Northern Ireland, to include cross-border road and rail, cycling and walking routes, as well as blueways, greenways and peatways.

The NCN should also take account of the National Biodiversity Action Plan which is currently under review. Any relevant actions from the revised action plan should be incorporated into the NCN.

Relevant Aspects of the Current State of the Environment

Water Quality

Hydromorphological pressures have been identified as the 2nd most prevalent significant pressure type within At Risk waterbodies during the 3rd Cycle Water Framework Directive Characterisation process. This pressure relates to damage to habitat and natural river or lake processes, through physical modification. Examples of such modifications include morphological changes such as river channel alteration, and hydrological modifications such as surface water abstraction.

Currently, the River Hydromorphology Assessment Technique (RHAT) is used to determine the hydromorphological condition of our rivers and the natural quality of the riparian zone (i.e. the corridor adjacent to the river extending up to 20m from the bank) feeds into the overall RHAT score amongst other criteria. However, hydromorphological condition currently only feeds into the WFD status assessment within High Status objective waterbodies.

The EPA has developed the MQI-Ireland hydromorphological condition assessment tool which provides a hydromorphological condition class for every river reach in the country (Good, Moderate, etc.). The MQI-Ireland tool comprises 15 hydromorphological condition indicators (MQI indicators) related to: longitudinal connectivity, lateral connectivity, channel morphology and, riparian condition. In this regard, any developments which involve permanent alteration of river riparian habitat can have a significant and lasting impact in either the RHAT or MQI condition assessment. This can have implications in our ability to meet our Environmental Objectives under the Water Framework Directive and can also contribute to waterbodies being designated as heavily modified depending on the nature and scale of the physical alterations. Any proposed developments associated with the NCN within the riparian zone of rivers and lakes should therefore carefully consider their long-term future impact on water quality and in particular hydromorphology, within this context.

SEA Objectives

Population and Health

The objective would be enhanced by referencing increased accessibility to active modes of transport.

The assessment question "*Promote the use of healthier modes of travel?*" could be amended to refer to the "*...use and benefits...*".

Water

The objective could be amended as follows: "*Protect, restore and where necessary improve and maintain water quality (surface waters and ground waters) to meet the objectives of the Water Framework Directive*".

The assessment question "*Minimise physical alterations to waterbodies?*" could be amended to refer to minimising any hydromorphological impacts.

Alternatives

We acknowledge the detailed analysis of alternatives for the various cycle corridors presented in the SEA Environmental Report. It is not clear how this analysis of the different route options will be reflected in the final NCN. There would be merits in describing the alternatives considered, the

methodology applied, and the preferred corridors selected in the NCN. These should be accompanied by relevant figures showing the preferred corridors.

The alternatives should be assessed against the 'Strategic Environmental Objectives' identified in the SEA Environmental Report.

Mitigation

The examples of mitigation and enhancement measures proposed in Section 5.3 of the report could be incorporated into the NCN as a set of high-level environmental criteria to which projects developed under the NCN could adhere.

In addition to the mitigation measures proposed, there is also merit in including a measure relating to promoting the co-benefits that could be gained for air quality, noise and greenhouse gas emissions as part of the shift to sustainable and active modes of travel.

Integration of SEA into the NCN

The mitigation measures from the SEA Environmental Report should be incorporated into the NCN. The SEA Environmental Report states that due to the high-level nature of the nature of the corridors proposed for the NCN, it is not possible to propose specific mitigation measures for each corridor. While this may be correct, the SEA Environmental Report could refer to tiering in environmental assessments. I refer you to the EPA funded research project "[Tiering in Environmental Assessments](#)³" and the associated guidance document with the research. The research identified a range of good practice approaches to impact assessment tiering. The research identifies that SEAs and their associated plans should provide guidance, mitigation and monitoring recommendations for lower tier environmental assessments.

Monitoring

The Monitoring Programme should be flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise during implementation. 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, responsibilities and reporting.

If the monitoring identifies adverse impacts during the implementation of the NCN, Transport Infrastructure Ireland should ensure that suitable and effective remedial action is taken.

The implementation of the NCN should include provisions for annual reporting on implementation of the NCN commitments. The NCN implementation, environmental monitoring and reporting should be aligned with the environmental monitoring and reporting required under the SEA legislation. This will assist in evaluating the environmental performance of the NCN.

Guidance on SEA-related monitoring is available on the EPA website at <https://www.epa.ie/publications/research/environmental-technologies/research-306-guidance.php>

³<https://www.epa.ie/publications/research/epa-research-2030-reports/research-391-tiering-of-environmental-assessment--the-influence-of-strategic-environmental-assessment-on-project-level-environmental-impact-assessment.php>

Future Amendments to the NCN

Any future amendments to the NCN should be screened for likely significant environmental effects, using the same method of assessment applied in the “environmental assessment” of the NCN.

SEA Statement – “Information on the Decision”

Once the NCN is finalised, an SEA Statement should be prepared that summarises:

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

A copy of the SEA Statement with the above information should be sent 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/publications/research/environmental-technologies/research-306-guidance.php>

Environmental Authorities

In accordance with the SEA Regulations the following authorities should be consulted with:

- Environmental Protection Agency;
- Minister for Housing, Local Government and Heritage;
- Minister for Environment, Climate and Communications; and,
- Minister for Agriculture, Food and the Marine.

APPENDIX II: SPECIFIC COMMENTS ON THE DRAFT NATIONAL CYCLE NETWORK PLAN

The NCN

As referred to in the comments on the SEA Environmental Report the introduction to the NCN would benefit from the inclusion of a schematic outlining the hierarchy of relevant EU and national plans to which the NCN relates, e.g. Zero Pollution, Green Deal, Climate Action Plan 2021, transport plans. It would also be useful for the NCN to include clarity on the lifespan of the plan. Will there be a review or interim review of the plan to assess progress towards implementing the network? If so, it would be useful to clarify when this might take place in the NCN. It might be useful to consider aligning any proposed reviews of the plan with reviews of other relevant plans, e.g. Climate Action Plan.

Vision

The vision for the NCN should make reference to the targets in the Climate Action Plan 2021 in relation to reducing emissions from the transport sector by 2030.

Peatlands and People LIFE Project

There is merit in consulting with the project coordinators for the Peatlands and People Life project in relation to the development of the peatlands cycleways (<https://peatlandsandpeople.ie/>).

Environmental Pressures

The NCN would benefit from a more explicit explanation in terms of environmental pressures that it will address. For example, the plan would benefit from elaborating on how it will contribute towards meeting the relevant actions set out in the Climate Action Plan 2021 in relation to developing a network of cycleways in Ireland and thus also contribute to Ireland's commitment for carbon neutrality by 2030.

Integration of the environmental assessments

The NCN would benefit from the inclusion of a section or chapter related to "Environmental Assessment" showing how the assessment process and the SEA recommendations have been integrated into the NCN. In particular, the NCN should include clear commitments to implement the recommendations and mitigation and monitoring measures identified in the SEA.

Monitoring and Implementation

The NCN would benefit from the inclusion of a chapter relating to monitoring and implementation. This chapter set out how the NCN will be implemented and reviewed over its lifetime. A set timeframe for review would provide an opportunity to evaluate delivery and to reflect relevant external changes, including environmental considerations. This chapter should also include provisions for collaboration with relevant public authorities and stakeholders during the implementation stage. We recommend aligning the implementation monitoring/reporting of the NCN with the environmental monitoring required under the SEA legislation. This would enable the environmental performance of the NCN to be evaluated and provide for increased transparency during implementation. There may be merits in aligning the periodic reviews of the NCN with existing cyclical reporting e.g. State of Environment reports, Long Term Climate Strategies, National Planning Framework, etc. The requirements for SEA and AA should also be considered in future reviews of the NCN.

APPENDIX III: KEY CHAPTERS OF IRELAND'S ENVIRONMENT – AN INTEGRATED ASSESSMENT 2020

Chapter 2 of the SOER2020 relates to [Climate Change](#). This chapter clearly states the scale and pace of greenhouse gas emissions reductions must accelerate. Reducing emissions requires far reaching transformative change across the whole economy, including in transport. Ireland's greenhouse gas emissions profile – with over 20% of emissions coming from transport – is particularly challenging. Ireland must also maximise the use of land as carbon stores, for example through grasslands, wetlands and forestry, to meet targets. These requirements must be balanced in the NAP with a need to ensure sustainable agriculture in Ireland.

Chapter 11 of the SOER2020 relates to [Environment and Transport](#) and states that transport is responsible for 20% of Ireland's greenhouse gases, making it a significant pressure on the environment. The sector requires transformation to shift to more sustainable modes of transport, including cycling. This shift is an essential part of a sustainable and climate-neutral transition for the transport sector. The chapter also outlines the multiple benefits that can be delivered by a modal shift in transport options reducing greenhouse gases, tackling growing traffic congestion, reducing air pollution and noise emissions, and enhancing wellbeing and the economy.

Chapter 14 of the SOER2020 relates to [Environment Health and Wellbeing](#). The chapter highlights that a good-quality, well-protected environment has significant health and wellbeing benefits. Research has shown that access to clean green and blue spaces in our environment is good for us. The provision of health-promoting environments in urban planning is central to Ireland's transition to more compact and urban living. Greater individual action needs to be taken to proactively tackle avoidable health consequences linked to the environment, including making sustainable commuting decisions.

These chapters should be consulted along with the related Key Messages prior to finalising the NCN and the SEA process.