

**Annette Ryan**

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**From:** David Galvin <[REDACTED]>  
**Sent:** Thursday 8 December 2022 09:56  
**To:** Development Plan  
**Subject:** Re. Proposed Amendments to the Draft Clare County Development Plan 2023-2029  
**Attachments:** SCP200903.3 EPA Sub. P.A.Draf.Clare CDP 23-29 .pdf; EPA SEA-LandUse-Recommendations-Guidance\_2022.pdf

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Clare County Council  
Aras an Chontae  
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8<sup>th</sup> December 2022

Our Ref: SCP200903.3

**Re. Proposed Amendments to the Draft Clare County Development Plan 2023-2029**

Dear Ms Quinn,

We acknowledge your notice, dated 28<sup>th</sup> November 2022, in relation to the Proposed Amendments, (the 'Amendments') to the Draft Clare County Development Plan 2023-2029 (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 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 and should be considered, as appropriate and relevant to the Amendments.

**Specific Comment**

We acknowledge the *Addendum to Environmental Assessments* documents prepared separately for these Amendments. In particular, we note the identification and summary of the potential for likely significant effects undertaken for each specific land-use rezoning. We note the SEA recommendations and SEA

mitigation measures proposed and welcome that the approach taken supports the proper and sustainable development of lands.

In proposing the Amendments, Clare County Council should ensure that the Plan, as amended, 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.

In considering the Amendments, Clare County Council should consider the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

Clare County Council should also ensure that the Plan is consistent with key relevant higher-level plans and programmes.

### **Future Modifications to the Draft Plan**

Where further changes to the Draft Plan are proposed, these should be screened for likely significant effects in accordance with SEA Regulations. They should be subject to the same method of assessment applied in the “environmental assessment” of the Draft Plan.

### **SEA Statement – “Information on the Decision”**

Once the Plan is adopted/made, you should prepare an SEA Statement that summarises 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.

Guidance on preparing SEA Statements is available on the EPA website at the following link: [https://www.epa.ie/publications/monitoring--assessment/assessment/EPA\\_Guidance\\_web.pdf](https://www.epa.ie/publications/monitoring--assessment/assessment/EPA_Guidance_web.pdf)

### **Environmental Authorities**

Under the SEA Regulations, you should consult 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.
- 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 also be grateful if you could send an email confirming receipt of this submission to: [sea@epa.ie](mailto:sea@epa.ie).

Yours Sincerely,

A handwritten signature in cursive script that reads "David Galvin".

---

David Galvin  
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Yours Sincerely,

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---

David Galvin  
SEA Section  
Office of Evidence and Assessment







## **SEA of Local Authority Land-Use Plans - EPA Recommendations and Resources**

**2022 Version 1.18**

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**Tracking of Updates for 2022**

<b>Version No.</b>	<b>Date</b>	<b>Updates since previous version</b>
Version 1.15	02/03/2022	Updated Noise Section
Version 1.16	01/04/2022	Updated Water, Waste and Climate Sections
Version 1.17	19/07/2022	Updated Bathing Water, GHG Emissions Projections, EIA Guidelines references
Version 1.18	06/10/2022	Added link to EPA Green Public Procurement Guidance, Air Quality Report 2021

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## 1. Introduction

This document provides key EPA recommendations for Local Authorities to consider when carrying out Strategic Environmental Assessment (SEA) of land-use plans at county and local level. It also includes information on recently published EPA reports and links to other relevant resources.

EPA is one of the statutory Environmental Authorities under the SEA regulations. Our role in SEA focuses on promoting full integration of the findings of the Environmental Assessment into the Plan. It is not the function of the EPA to either approve or enforce Plans or SEAs.

We focus our efforts and resources on reviewing and commenting on key national and regional plans within the planning hierarchy. For Local Authority land use plans at county and local level, we advocate a 'self-service approach' through use of this guidance document. This document is updated regularly.

### **State of the Environment Report – Ireland's Environment 2020**

In preparing the *plan/programme/modification* and associated SEA, the recommendations, key issues and challenges described within our State of the Environment Report [Ireland's Environment – An Integrated Assessment 2020 \(EPA, 2020\)](#) should be considered.

## 2. Key Environmental Recommendations to Consider

### Drinking Water

In considering additional zoning/development and growth of settlements within the Plan area, it is critical that development be closely linked to the ability to provide a safe and secure supply of drinking water and related critical service infrastructure.

We have produced a series of drinking water quality reports, including the *Drinking Water Report for Public Water Supplies – 2020* (EPA, 2021), that should be consulted to ensure the relevant recommendations are implemented to improve drinking water quality. Key issues identified with particular supplies, including significant issues identified through (Irish Water) Drinking Water Safety Plans, should be highlighted for individual plans. We recommend including a commitment to collaborate with Irish Water and other relevant stakeholders in the Plan, to provide an adequate and appropriate drinking water supply.

A 'Remedial Action List' (RAL) of problematic drinking water supplies is released by the EPA on a quarterly basis. It is a dynamic list which records identified and reported issues. Once appropriate mitigation measures are established and implemented, supplies are removed from the RAL. You should consider including a commitment in the Plan to support Irish Water, in addressing issues where water supplies servicing the Plan area included on the RAL. Further information can be found at: <https://www.epa.ie/publications/compliance--enforcement/drinking-water/>.

### **Conservation of Water Resources**

The Plan should include an Objective/Policy promoting the need for the conservation of water resources and also the need for detection/mitigation of infrastructural leakages. It may also be useful to consider developing a Water Conservation Strategy, in association with Irish Water and adjoining local authorities, where appropriate.

## **Waste Water**

Our [Water Quality in 2020](#) (EPA, 2020) highlights that one of the key causes of water pollution is from point sources including discharges from waste water treatment plants. The need to provide and maintain adequate and appropriate wastewater treatment infrastructure to service zoned lands and developments over the lifetime of the Plan should be included as a specific Policy/Objective in the Plan.

Agglomerations with no treatment or poorly performing (or at capacity) treatment plants are highlighted in the [Urban Waste Water Treatment in 2020](#) (EPA, 2021). A commitment to support the provision of appropriate measures to address these issues as a priority, in collaboration with Irish Water should be considered where relevant. Measures to ensure that combined storm water overflows, sewers and trade effluent in the area covered by the Plan is also managed properly should also be included as appropriate.

You should also consult our [2021 Code of Practice for Domestic Waste Water Treatment Systems](#), (EPA, 2021).

The [National Inspection Plan for Domestic Wastewater Treatment Systems 2022-2026](#) (EPA, 2021), and [Domestic Waste Water Treatment System Inspections 2020](#) (EPA, 2021) reports should also be considered, as appropriate.

## **Water Framework Directive**

### **Protection of Surface and Ground Water Resources**

Protecting our valuable surface and ground water resources is of vital importance to protect both human health and provide for a healthy environment. In this context, you should provide clear commitments in the Plan to protect surface water, groundwater and coastal/estuarine resources and their associated habitats and species, including fisheries within and adjacent to the Plan area. Where specific recommendations/concerns for water bodies within the Plan area are identified in EPA water quality reports, including the [Water Quality in 2020-An Indicators Report](#) (EPA, 2021) and [Water Quality in Ireland 2013-2018](#) (EPA, 2019), these should also be addressed/considered at an appropriate level in the Plan.

The Plan should also ensure that any specific relevant objectives and measures for individual water bodies, within the Plan area as set out in the existing relevant Water Framework Directive River Basin Management Plan, are provided for in order to ensure water quality is protected/improved/maintained. The Plan should also consider that subsequent water management plans (including catchment management plans) may arise out of current review of the second cycle of WFD River Basin Management Planning should be integrated as appropriate upon their adoption. The 'integrated catchment management' approach for protecting and managing water resources, should also be supported in the Plan. The EPA's [www.catchments.ie](http://www.catchments.ie) website provides useful resources such as GIS mapping and related information that should be useful in preparing the Plan.

The [European Union \(Water Policy\) Regulations 2014](#) (S.I. No. 350 of 2014) sets out the roles and responsibilities of the various stakeholders and the associated requirements in relation to river basin management planning and should be integrated as appropriate. These responsibilities should be reflected in the Plan and the associated environmental monitoring.

### **Protection of Groundwater Resources**



Groundwater aquifers form important sources of drinking water both locally and regionally. Much of the summer seasonal flow in many rivers is also derived from groundwater sources. To maintain high quality water resources within the Plan area, it is important that development is controlled and managed appropriately, in particular in areas of high groundwater vulnerability to avoid transmission of pollutants into important aquifers.

The Plan should include a clear Policy / Objective for the protection of groundwater resources and associated habitats and species. The Plan should also include a commitment to integrate any existing Groundwater Protection Schemes and Groundwater Source Protection Zones, as relevant and appropriate within the Plan area. The Plan should also include a commitment to comply with the [European Communities Environmental Objectives \(Groundwater\) Regulations 2010](#) (S.I. No. 9 of 2010).

Issues to consider relating to protection of groundwater include; *enforcement of planning conditions related to installation, operation and maintenance of on-site wastewater treatment / septic tank systems, connection of all remaining houses within settlement boundaries to wastewater treatment plant, the development of a wastewater leak detection programme* and the implementation and enforcement of the [European Communities \(Good Agricultural Practice for Protection of Waters\) Regulations 2009](#) and associated [European Union \(Good Agricultural Practice For Protection Of Waters\) Regulations 2017](#) (S.I. No 605 of 2017) and [European Union \(Good Agricultural Practice For Protection Of Waters\)\(Amendment\) Regulations 2018](#) (S.I. No 65 of 2018).

#### **Protection and Management of Bathing Waters**

The obligation to protect bathing waters within (and adjacent to) the Plan area should also be reflected in the Plan. Bathing Waters are afforded protection under Directive 2006/7/EC, known as the 'Directive on bathing water', which is transposed into National legislation by the [Bathing Water Quality Regulations 2008](#) (S.I. No. 79) of 2008. In addition, under the Water Framework Directive, recreational waters/bathing water areas are included on the Register of Protected Areas. The Plan should provide for the protection of any waters which are used for bathing within or adjacent to the Plan area.

The EPA's most recent report on bathing water quality [Bathing Water Quality in Ireland – A Report for the Year 2021](#), (EPA, 2022) sets out the status of Irish Seawater and Freshwater Bathing areas and should be integrated as appropriate. The EPA's available bathing water advice/guidance includes an online GIS resource [beaches.ie](http://beaches.ie), which should be considered.

#### **Water Framework Directive & Biodiversity**

Any sites of significant biodiversity value within or adjacent to the Plan area listed on the Water Framework Directive Register of Protected Areas, (such as Fresh Water Pearl Mussel Catchments, designated Salmonid waters, fisheries / shellfisheries), should be protected in preparing the Plan.

#### **Marine Waters**

Where the Plan might have an impact on the marine environment, the Plan should consider the requirements of the Marine Strategy Framework Directive and the environmental commitments set out in Ireland's National Marine Planning Framework, as appropriate and where relevant.

## **Flooding**

The Plan should fully comply with [The Planning System and Flood Risk Management – Guidelines for Planning Authorities](#) (OPW/DHLGH, 2009). These Guidelines place requirements on planning authorities to carry out strategic flood risk assessments and also to ensure that development/zoning

of vulnerable land uses, in areas at significant risk of flooding (flood zones A and B) is avoided. In effect, only flood/water compatible uses should be built in flood plains. Where this is not possible, any proposal for development/zoning is required to include a 'Justification Test' in accordance with the Guidelines. Examples of vulnerable land uses include hospitals, residential developments and essential infrastructure such as transport and utilities (electricity generating power stations, water and sewage treatment) and potential significant sources of pollution (SEVESO sites, IPC sites).

The OPW website to access flood risk management plans, flood maps and information on flood risk management in Ireland can be consulted at: [www.floodinfo.ie](http://www.floodinfo.ie).

The Plan should include a commitment to carry out strategic flood risk assessments, in line with the Flood Risk Management Guidelines, to inform the development and implementation of the County Development Plan and lower level local area plans respectively.

A specific Policy should be included to provide for/promote appropriate flood risk assessments to be undertaken, where development / zoning is being proposed in the Plan area where there is significant risk of flooding, in accordance with the Guidelines referred to above.

The Plan should also promote the development, where appropriate, of adaptation measures to account for the likely increased risk of flooding due to climate change within the Plan area, including implementation of adequate and appropriate Sustainable Urban Drainage Systems. Additionally, the Plan should provide for protection, management, and as appropriate, enhancement of existing wetland habitats where flood protection/management measures are necessary.

Integrated Coastal Zone Management should also be considered as relevant and appropriate, to inform the preparation of coastal plans and programmes.

## Climate Change / Climatic Factors

Urgent action is needed to address climate change and to move Ireland towards a low carbon, climate resilient economy and society. Climate change adaptation and mitigation measures should be included in the Plan as appropriate and the Plan should be consistent with the *National Policy Position on Climate Action and Low Carbon Development*<sup>1</sup>, the *National Climate Action Plan 2021* and the *National Adaptation Framework*, as well as relevant sectoral, regional and local adaptation plans.

The Agency recently published [Ireland's Greenhouse Gas Emissions Projections for 2021-2040](#) (EPA, 2022) which should be taken into account in preparing the Plan, as appropriate and relevant.

The EPA has published an update of its 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<sup>2</sup>). This guidance will dovetail with the DHLGH review of the Development Plan, Planning Guidelines for Planning Authorities (2007). The update and review of both these guidance documents will enhance linkages and create synergies between the plan-making and SEA processes. Key aspects to be considered in the Plan and SEA, where relevant, include:

- Direct and indirect impacts of the Plan on greenhouse gas emissions and removals (Mitigation)

<sup>1</sup> <http://www.dcae.gov.ie/en-ie/climate-action/publications/Pages/National-Policy-Position.aspx>

<sup>2</sup> <http://www.epa.ie/pubs/advice/ea/EPA%20SEA-Climatic-Factors-Guidance-Note.pdf>

- 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)

### Mitigation

To fulfil national commitments on greenhouse gas emissions reduction, Ireland must effectively switch away from fossil fuel sources of energy by 2050. The Plan should reflect the need to reduce greenhouse gas emissions and to protect, maintain and enhance carbon stocks. The inclusion of specific policies/objectives which promote the integration of climate change mitigation measures at a regional and local level in land use planning within the Plan area should also be considered. In developing and implementing mitigation-related measures, opportunities should be sought to maximise the potential co-benefits of for the wider the environment and society, such as improvements in air quality, water quality, biodiversity, public amenity, renewable energy, tourism etc.

### Adaptation

Climate change is already discernible in Ireland, especially within the temperature record, and projected climate change impacts include higher intensity rainfall events, more intense storms and storm surge, sea level rise, warmer temperatures and longer periods of low rainfall.

Under the National Adaptation Framework (DCCA, 2018) a number of Government Departments are required to prepare sectoral adaptation plans in relation to the priority sectors they are responsible for. Local Authorities are also required to prepare local adaptation strategies. These plans and strategies will be reviewed at least once every five years in line with reviews of the Framework. The first round of adaptation plan and strategy development was completed in 2019. These sectoral adaptation plans and local authority strategies can be found at <https://www.climateireland.ie/#!/tools/adaptationStrategyExplorer>

These were prepared in line with DECC Guidelines to assist local authorities prepare adaptation strategies (DECC, 2018<sup>3</sup>) and the relevant sectors prepare sectoral adaptation plans. (DECC, 2018<sup>4</sup>). The local Guidelines were prepared building on earlier guidelines published by the EPA to support local authorities in developing local climate adaptation strategies (EPA, 2016).

In keeping with the approach of the National Adaptation Framework, the local Guidelines say that the local adaptation strategy should be used to mainstream adaptation over time into the plans and policies of the local authority (i.e. during the review of local authority development plan or other plans and policies).

It is noted that policy developments such as the Climate Action and Low Carbon Development (Amendment) Bill 2020, Climate Action Plans and Local Authority Climate Action Charter (DECC, 2019) place additional obligations on local authorities.

In preparing the Plan and associated SEA, the degree to which climate change impacts, individually and in combination, are likely to influence its implementation and operation and coherence with any relevant sectoral adaptation plans should be considered. Aspects to be considered include the resilience of existing and proposed infrastructure and systems to climate variability. This analysis may include an assessment of responses to recent extreme weather events and the adequacy of existing

<sup>3</sup><https://www.dccae.gov.ie/en-ie/climate-action/publications/Pages/Local-Authority-Adaptation-Strategy-Development-Guidelines.aspx>

<sup>4</sup><https://dccae.gov.ie/en-ie/climate-action/publications/Pages/Sectoral-Planning-Guidelines-for-Climate-Change-Adaptation.aspx>



systems and procedures. Other climate change impacts to be considered include changes in native species and habitats and the spread of invasive species, pests and pathogens. To minimise any adverse impacts identified in the SEA, the Plan should include appropriate climate change adaptation measures that can be implemented either directly or through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, Integrated Coastal Zone Management Plans etc.

The 'Climate Ireland' platform 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 <http://www.climateireland.ie/#/>

### Monitoring

The Plan and SEA should consider monitoring for both climate mitigation and climate adaptation monitoring aspects, where relevant and appropriate.

### Role of the Office of the Planning Regulator (OPR) with respect to climate change

One of the statutory functions of the OPR is to evaluate and assess local authority development plans. Whilst neither an environmental authority under the SEA Regulations nor a decision-making authority, the OPR has an important role in ensuring that plans meet their legislative and policy requirements, which includes the requirement to undertake SEA.

As part of the plan evaluation role, the OPR reviews plans to ensure consistency with relevant national and regional policies; including the National Planning Framework and the Regional Spatial and Economic Strategies. The OPR also has a particular focus on climate change aspects of development plans.

The OPR has published a new Case Study Paper entitled '*Climate Action and the Local Authority Development Plan*'. The paper is available from the OPR website using the following link: <https://publications.opr.ie/view-file/89>. The paper demonstrates how local authority development plans have the potential to play a significant role, at local level, in supporting wider efforts to ensure that Ireland meets its ambitious climate mitigation targets.

## Air

Air quality legislation in Ireland highlights the need "*to avoid, prevent or reduce harmful effects on human health and the environment as a whole*". In addition, it requires that Local Authorities where appropriate "*shall promote the preservation of best ambient air quality compatible with sustainable development*". These requirements should be incorporated by means of a specific plan objective / policy.

It is also worth noting that the [National Clean Air Strategy](#) (DECC) is currently being prepared, with the intention of developing the necessary policies and measures to comply with new and emerging EU legislation, in addition to supporting climate change mitigation.

Recent [EPA reports on air quality](#) include the *Air Quality in Ireland 2021 Report* (EPA, 2022) which sets out the most recent status in each of the four air quality zones in Ireland. Where relevant, the EPA have also published [Urban Environmental Indicators for Nitrogen Dioxide levels in Dublin](#) (EPA, 2019) to also take into account.

The EPA manages the national ambient air quality monitoring network and measures the levels of a number of atmospheric pollutants. The pollutants of most concern are those whose main source is traffic such as Particulate Matter and Nitrogen Dioxide should to be taken into account. Information

in relation to these aspects is available at: <https://www.epa.ie/publications/monitoring--assessment/air/ambient-air-monitoring/>

## Noise

In Ireland, the Environmental Noise Directive (END) is implemented through S.I. No. 549 of the Environmental Noise Regulations 2018, as amended in 2021<sup>[1]</sup>. The END requires Member States to prepare and publish, every 5 years, strategic noise maps and noise management action plans for transport noise sources (roads, rail and airports) and industry. The aim of the END is to provide a common framework to avoid, prevent or reduce the harmful effects of exposure to environmental noise. In this context, as appropriate, the Plan should promote the implementation of the Environmental Noise Directive and associated national regulations.

<http://www.irishstatutebook.ie/eli/2018/si/549/made/en/print> & [S.I. No. 663/2021 - European Communities \(Environmental Noise\) \(Amendment\) Regulations 2021 \(irishstatutebook.ie\)](#)

The National Planning Framework <https://npf.ie/> recognises the significance of environmental noise and includes National Policy Objective 65 to '*Promote the pro-active management of noise where it is likely to have significant adverse impacts on health and quality of life and support the aims of the Environmental Noise Regulations through national planning guidance and Noise Action Plans.*' As part of the LA Performance framework (REMCI) reporting priorities, there are two new targets for noise in 2021 (i) NAPs Reporting Deadline, and (ii) Strategic Noise mapping data collection phase. A local authority WG are currently developing a 'Noise in Transportation - Planning Advice Note' which is expected to be finalised in May 2021<sup>5</sup>.

The noise action plans (NAPs) involve the identification of measures needed for the prevention and reduction of environmental noise. The LAs are now required to report progress (each year) on the implementation of their NAPs. The Noise Action Plans should be considered and reviewed by Local Authorities as required, to reflect the Plan period and associated development proposals. Consideration should be given to any relevant noise maps, and action plans. Strategic noise maps are designed to assess population noise exposure resulting from major roads, railways and airports. Noise action plans are designed to act as a means of managing environmental noise through land use planning, traffic management and control of noise sources. The fourth round of noise mapping is currently underway in Ireland and the maps should be completed in early 2023. <http://noise.eionet.europa.eu/help.html>.

For larger urban areas, the extra value placed on Quiet areas will be a key priority as part of noise action planning going forward. One of the key messages in the SOER 2020 Noise chapter is that '*Local Authorities should promote the value of designating quiet areas in cities for health and wellbeing.*' <https://www.epa.ie/publications/monitoring--assessment/assessment/state-of-the-environment/irelands-environment-2020--chapter-4--environmental-noise.php/>. Separately, the SOER 2020 noise chapter also has three key messages around noise that could be relevant.

While there have been some positive developments around the designation of quiet areas, it's an area that could be promoted further. There might be opportunities to link to initiatives and research around green and blue spaces for health and wellbeing. Dublin City Council has designated eight Quiet Areas (QAs) while South Dublin County Council, Limerick City and County Council as well as

<sup>[1]</sup> The Environmental Noise Regulations 2018 both revise and revoke the Environmental Noise Regulation 2006 and transpose the common noise assessment methods (CNOSSO) Directive 2015/996.

<sup>5</sup> The LA group is being led by Kildare Co Council (John O'Neill) and Limerick City & Co Council (Simon Jennings).

Kilkenny County Council are all doing some good work on the identification of quiet areas in their cities. Consideration should also be given to protect designated quiet areas in open country or along the coasts.

## Waste Management

The Plan should promote the integration of land use zoning and development to existing and planned availability of waste management infrastructure and capacity. This includes the redevelopment of brownfield sites and management of contaminated soil. The Plan should also refer to and incorporate the relevant aspects of the [Waste Action Plan for a Circular Economy](#) (DECC, 2020) and the relevant Regional Waste Management Plan, along with recognition and provision for the beneficial management of materials that are prevented from becoming waste, or those waste materials that have achieved end-of-waste status.

In addition, the Plan should promote and incorporate the relevant recommendations in the following series of EPA reports including:

- Draft National Hazardous Waste Management Plan 2021-2027 (EPA, in preparation)
- EPA [National Waste Statistics](#)
- [National Waste Statistics Summary Report for 2019](#) (EPA, 2021)
- [Progress Report on the National Hazardous Waste Management Plan](#) (EPA, 2018)

These, and other resources are available at: <https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/waste/>

## Radon

Where significant concentrations of radon occur within the Plan area, these should be taken into account in the Plan or associated development control measures, as appropriate. Radon Maps are available at <https://www.epa.ie/environment-and-you/radon/radon-map/> which should be useful in identifying potential for significant radon accumulations within the Plan area. Reports on radioactivity monitoring of the Irish environment are also available at <https://www.epa.ie/environment-and-you/radon/>.

### **3. Wider Environmental Recommendations to Consider**

#### Biodiversity

Biodiversity within the Plan area may include designated and undesignated sites, habitats, species and networks of importance at an international, national, regional or local level. The protection of ecological resources is a key consideration which needs to be addressed. In this regard, the Plan should include clear Policies/Objectives to conserve and protect all designated sites within, and in the vicinity of the Plan area (including the habitats and/or species for which they have been selected, or which they support), and should also promote the protection of undesignated sites and local biodiversity features.



The Plan should also promote the need to protect and where possible improve wider aspects of biodiversity including ecological corridors / linkages / green infrastructure, areas of important local biodiversity, the provision of buffer zones between developments and areas of significant biodiversity and ensuring appropriate control and management measures for invasive species.

Plans should be supported / informed by available habitat mapping (including wetland mapping) and other ecological surveys as relevant. The Plan should refer to and reflect the relevant commitments in Ireland's *National Biodiversity Action Plan 2017-21* (DHLGH, 2017). The NPWS are currently progressing preparation of the *National Biodiversity Action Plan 2023-2027*. Additionally, the NPWS have published the [Article 17 Report on the Status of EU Protected Habitats and Species in Ireland](#) (NPWS, 2019). Local Heritage/Biodiversity plans should be highlighted and should promote the implementation of key actions set out in these plans. Where not established, commitments should be included to prepare these plans.

### **Appropriate Assessment**

The Plan should make reference to the DECLG Publication '[Appropriate Assessment of Plans and Projects in Ireland- Guidance for Planning Authorities](#)' (2009; revision 2010), in relation to the requirements of Article 6 of the Habitats Directive.

The Plan should refer to the need to comply with the requirements of Article 6 of the Habitats Directive. The Plan should, where relevant, be subject to the requirements of the Habitats Directive. It should include a clear policy/objective that sets out a requirement for AA Screening for new, reviewed or amended Plans and proposed projects, in relation to potential effects on European sites in view of their conservation objectives. Any potential for cumulative/in-combination effects associated with other relevant Plans/Programmes/Projects should be considered.

You should consult with the National Parks and Wildlife Service (NPWS) regarding screening of the *Plan* for Appropriate Assessment. Where Appropriate Assessment is required, any findings or recommendations should be incorporated into the SEA and the *Plan*, as appropriate.

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: <https://gis.epa.ie/EPAMaps/AAGeoTool>

### **Green & Blue Infrastructure**

Where the development of new greenways and blueways is considered, these should look to support rather than replace existing green infrastructure. The EPA report '[Our Environment, Our Health, Our Wellbeing: Access to Blue/Green Spaces in Ireland](#)' and associated toolkit (EPA, 2021) explores the key forces and patterns at work in relation to access to blue/green spaces in Ireland and possible impacts in national, regional and local contexts through data analytics, visualisation and mapping.

### **Integrated Biodiversity Impact Assessment**

In 2012, we published guidance on [Integrated Biodiversity Impact Assessment – Streamlining AA, SEA and EIA Processes. Best Practice Guidance](#). This guidance aims to inform practitioners, plan/project proponents and consent authorities on integrating SEA, EIA and AA processes and requirements in order to streamline biodiversity considerations.

## Energy Conservation & Renewable Energy

When considering energy conservation / renewable energy aspects of the Plan, where relevant, the [Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change](#) (DHLGH, 2017) should be taken into account. The Government White Paper – *Ireland's Transition to a Low Carbon Energy Future 2015-2030* (DECC) should also be considered.

The relevant renewable energy / energy conservation actions in the National Mitigation Plan should be integrated. Additionally, the Plan should, where relevant, include a commitment to prepare and implement an 'Energy Conservation Strategy' and associated awareness campaign within the lifetime of the Plan where feasible.

The Plan should also support and promote the need for energy conservation measures to be incorporated into buildings. Relevant guidance in this regard, can be found on the website of the Sustainable Energy Authority of Ireland: [www.seai.ie](http://www.seai.ie).

There is merit in including a commitment where relevant and appropriate, to use energy derived from renewable energy systems (e.g. solar, wind, bioenergy, geothermal etc.) and energy storage networks and systems within the Plan area.

## Landscape

The Plan should provide for the protection of designated scenic landscapes, scenic views, scenic routes and landscape features of national, regional, county and local value. The Plan should also take into account the landscape character adjoining the Plan area. Visual linkages between established landmarks and landscape features and views should be taken into account when land is being zoned and when individual development proposals are being assessed / considered. The *National Landscape Strategy* (DHLGH, 2015) should be taken into account and integrated as appropriate into the Plan.

## Geology / Geomorphology

The Plan should protect any designated Geological and Geomorphological NHAs/pNHAs, which may be present/designated within or adjacent to the Plan area in consultation with the Geological Survey of Ireland.

## Human Health / Quality of Life

In addressing human health and quality of life, the Plan should consider the socioeconomic status of the population within the plan area and in particular should consider any socioeconomic inequalities. This is important to ensure that the Plan does not exacerbate any existing inequalities and ideally promotes and supports the balancing of existing socioeconomic inequalities.

The Plan should ensure provision of adequate and appropriate infrastructure and to serve both the existing community and likely future predicted increases in population within the Plan area. In preparing the Plan, there is merit in exploring current practice and opportunities with respect to promote the protection and, as appropriate, improvement of "Quality of Life". Where relevant, the application of existing "Quality of Life Indices" would be considered in consultation with relevant statutory and non-statutory bodies/organisations. We also refer you to the relevant aspects already

referred to above under water, biodiversity, air, energy as the links between a high-quality environment and improved health and wellbeing are well established.

The EEA have published a report on the environment and health, that may be useful to consider. This report also highlights the importance of access to good quality green and blue space. It can be consulted at: <https://www.eea.europa.eu/publications/healthy-environment-healthy-lives>.

## **Transportation**

The Plan should promote and as appropriate, provide for the provision of sustainable modes of transport. The Department of Transport [\*Smarter Travel – A Sustainable Transport Future – Transport Policy for Ireland 2009-2020\*](#) report (DoT, 2009) should be referred to, in the context of possible initiatives which could be included as objectives within the Plan. The Plan should include and provide support for appropriate access to public transport, dedicated cycleways and pedestrian pathways, access to rapid charging infrastructure etc.

The transport-related actions in the Climate Action Plan 2021 and the National Planning Framework, should also be considered and integrated, as appropriate in the Plan. In seeking to support achieving a low carbon economy, it is important to consider and manage transport related emissions within the Plan area. In this regard the Plan should promote, and as appropriate provide for sustainable modes of transport.

Promoting the development of traffic management measures to reduce the potential for traffic congestion and associated vehicular emissions should be considered. In particular, it would be useful to prepare (and review existing) Integrated Traffic Management Plans, where relevant and appropriate, for the existing urban areas and proposed new urban developments to consider and address the short, medium and long-term traffic management requirements within the Plan area.

## **Infrastructure Planning**

Where zoning/rezoning of lands and the introduction of new development is being proposed within the Plan area, the Plan should promote the need for an integrated planning approach to service any development proposed and authorised during the lifetime of the Plan in collaboration with key stakeholders.

The Plan should, (when considering additional development proposals), support and promote the provision of adequate and appropriate critical service infrastructure, surface and storm water drainage, public transport, waste management, community services and amenities etc. on a planned and phased basis. This is in the context of taking into account and addressing existing infrastructural inadequacies to meet the expected needs of predicted increases in population associated with the Plan implementation.

The potential impact on human health, habitats and species of ecological importance, flood risk and water quality should be taken into account in considering proposed additional infrastructure or in proposed upgrading of existing infrastructure.

## **Environmental Impact Assessment (EIA)**

The Plan should highlight that, under EIA and Planning & Development legislation, certain projects arising during the implementation of the Plan may require an EIA. It should be noted that projects

may also need to take into account the requirements of the Habitats Directive and associated regulations. It should be noted that the EPA's role in relation to carrying out EIA relates only to activities which are licensable by the EPA, namely Industrial Emissions (IE), Integrated Pollution Control (IPC), and Waste Management Act activities and licensing of wastewater discharges.

Guidelines on information to be contained in Environmental Impact Statements and Advice Notes on Current Practice in preparation of EIS are available at the following link:

<https://www.epa.ie/publications/monitoring--assessment/assessment/guidelines-on-information-to-be-contained-in-environmental-impact-statements-ei.php>

The EPA has also published [Guidelines on information to be contained in Environmental Impact Assessment Reports](#) (EPA, 2022) These Guidelines are primarily intended to be an authoritative reference to those preparing Environmental Impact Assessment Reports (EIARs) for projects covered by the EIA Directive. The Guidelines are a statutory document that should be regarded by those preparing EIARs and the decision makers considering the EIARs as part of the EIA process



## Appendix 1a: Links to environmental guidance/reports

Air	<a href="https://www.epa.ie/publications/monitoring--assessment/air/">https://www.epa.ie/publications/monitoring--assessment/air/</a>
Bathing Water	<a href="https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/">https://www.epa.ie/publications/monitoring--assessment/freshwater--marine/</a>
Biodiversity	<a href="http://www.npws.ie/guidance-appropriate-assessment-planning-authorities">http://www.npws.ie/guidance-appropriate-assessment-planning-authorities</a> <a href="http://www.npws.ie/publications">http://www.npws.ie/publications</a>
Climate Action	<a href="https://www.dccae.gov.ie/en-ie/climate-action/Pages/default.aspx">https://www.dccae.gov.ie/en-ie/climate-action/Pages/default.aspx</a> <a href="https://www.epa.ie/publications/monitoring--assessment/climate-change/">https://www.epa.ie/publications/monitoring--assessment/climate-change/</a> <a href="https://www.climateireland.ie/">https://www.climateireland.ie/</a>
Cumulative Effects Assessment	<a href="https://www.epa.ie/publications/monitoring--assessment/assessment/good-practice-guidance-on-cumulative-effects-assessment-in-sea.php">https://www.epa.ie/publications/monitoring--assessment/assessment/good-practice-guidance-on-cumulative-effects-assessment-in-sea.php</a>
DHPLG Guidelines / Legislation	<a href="https://www.housing.gov.ie/planning/planning">https://www.housing.gov.ie/planning/planning</a>
Drinking Water	<a href="https://www.epa.ie/publications/monitoring--assessment/drinking-water/">https://www.epa.ie/publications/monitoring--assessment/drinking-water/</a>
EIA	<a href="https://www.housing.gov.ie/planning/planning">https://www.housing.gov.ie/planning/planning</a>
Energy Conservation	<a href="http://www.seai.ie">www.seai.ie</a>
Flood Risk	<a href="https://www.flooding.ie/Planning/">https://www.flooding.ie/Planning/</a>
Geology / Geomorphology	<a href="http://www.gsi.ie">www.gsi.ie</a>
Ground Water	<a href="https://www.epa.ie/our-services/monitoring--assessment/freshwater--marine/groundwater/">https://www.epa.ie/our-services/monitoring--assessment/freshwater--marine/groundwater/</a>
Landscape Character Assessment	<a href="http://www.heritagecouncil.ie/">http://www.heritagecouncil.ie/</a>
Marine	<a href="https://www.marine.ie/Home/home">https://www.marine.ie/Home/home</a>
Noise	<a href="https://www.epa.ie/our-services/monitoring--assessment/noise/noise-mapping-and-action-plans/#d.en.86024">https://www.epa.ie/our-services/monitoring--assessment/noise/noise-mapping-and-action-plans/#d.en.86024</a>
Radon	<a href="https://www.epa.ie/our-services/monitoring--assessment/radiation/">https://www.epa.ie/our-services/monitoring--assessment/radiation/</a>
SEA EPA resources	<a href="https://www.epa.ie/publications/monitoring--assessment/assessment/Updated Draft SEA Guidelines (DHLGH, 2021)">https://www.epa.ie/publications/monitoring--assessment/assessment/Updated Draft SEA Guidelines (DHLGH, 2021)</a>
State of Environment	<a href="https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/state-of-environment-report-/">https://www.epa.ie/our-services/monitoring--assessment/assessment/irelands-environment/state-of-environment-report-/</a>
Surface Water	<a href="https://www.epa.ie/our-services/monitoring--assessment/freshwater--marine/#">https://www.epa.ie/our-services/monitoring--assessment/freshwater--marine/#</a>
Transportation	<a href="https://www.nationaltransport.ie/planning-policy/">https://www.nationaltransport.ie/planning-policy/</a> <a href="https://www.tii.ie/technical-services/environment/">https://www.tii.ie/technical-services/environment/</a>
Waste Management	<a href="https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/">https://www.epa.ie/our-services/monitoring--assessment/waste/national-waste-statistics/</a> <a href="https://www.epa.ie/our-services/monitoring--assessment/waste/">https://www.epa.ie/our-services/monitoring--assessment/waste/</a>
Waste Water	<a href="https://www.epa.ie/environment-and-you/waste-water/">https://www.epa.ie/environment-and-you/waste-water/</a>

Note: The above list is indicative only; all of the above may not be relevant to a particular plan



## Appendix 1b: Links to spatial environmental resources

Air	<a href="https://www.epa.ie/our-services/monitoring--assessment/air/#">https://www.epa.ie/our-services/monitoring--assessment/air/#</a> <a href="https://airquality.ie/">https://airquality.ie/</a>
Bathing Water	<a href="http://www.beaches.ie">http://www.beaches.ie</a>
Biodiversity	<a href="https://maps.biodiversityireland.ie/">https://maps.biodiversityireland.ie/</a> <a href="https://www.birdwatchireland.ie/OurWork/PolicyAdvocacy/BirdSensitivityMapping/tabid/1312/Default.aspx">https://www.birdwatchireland.ie/OurWork/PolicyAdvocacy/BirdSensitivityMapping/tabid/1312/Default.aspx</a> <a href="https://www.npws.ie/research-projects/ecosystems-services-mapping-and-assessment">https://www.npws.ie/research-projects/ecosystems-services-mapping-and-assessment</a> <a href="http://www.wetlandsurveysireland.com/wetlands/map-of-irish-wetlands--map-of-irish-wetlands---map/">http://www.wetlandsurveysireland.com/wetlands/map-of-irish-wetlands--map-of-irish-wetlands---map/</a>
Drinking Water	<a href="https://www.epa.ie/our-services/monitoring--assessment/drinking-water/">https://www.epa.ie/our-services/monitoring--assessment/drinking-water/</a>
EIA	<a href="https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal">https://www.housing.gov.ie/planning/environmental-assessment/environmental-impact-assessment-eia/eia-portal</a>
Flood Risk	<a href="http://www.floodinfo.ie">www.floodinfo.ie</a>
Geology / Geomorphology	<a href="http://www.gsi.ie/Mapping.htm">http://www.gsi.ie/Mapping.htm</a>
Ground Water	<a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/Groundwater.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/Groundwater.aspx</a> <a href="https://www.epa.ie/our-services/monitoring--assessment/freshwater--marine/groundwater/">https://www.epa.ie/our-services/monitoring--assessment/freshwater--marine/groundwater/</a> <a href="https://epawebapp.epa.ie/hydronet/#Water%20Levels">https://epawebapp.epa.ie/hydronet/#Water%20Levels</a>
Noise	<a href="https://gis.epa.ie/EPAMaps/">https://gis.epa.ie/EPAMaps/</a> (Under Environment & Wellbeing)
Radon	<a href="https://www.epa.ie/environment-and-you/radon/radon-map/">https://www.epa.ie/environment-and-you/radon/radon-map/</a>
SEA EPA resources	<a href="http://www.enviromap.ie">www.enviromap.ie</a> <a href="https://gis.epa.ie/EPAMaps/SEA">https://gis.epa.ie/EPAMaps/SEA</a> (SEAGIS Search and Reporting Tool) <a href="http://www.epa.ie/pubs/advice/ea/seaspatialinformationsourcesinventory.html">http://www.epa.ie/pubs/advice/ea/seaspatialinformationsourcesinventory.html</a>
Spatial Planning GIS	<a href="http://www.myplan.ie">www.myplan.ie</a> <a href="https://www.epa.ie/our-services/monitoring--assessment/assessment/mapping/">https://www.epa.ie/our-services/monitoring--assessment/assessment/mapping/</a> <a href="http://gis.epa.ie/SeeMaps">http://gis.epa.ie/SeeMaps</a> <a href="https://gis.epa.ie/EPAMaps/SEA">https://gis.epa.ie/EPAMaps/SEA</a> <a href="https://www.enviromap.ie">https://www.enviromap.ie</a> <a href="https://www.opr.ie/resources/">https://www.opr.ie/resources/</a> <a href="https://www.opr.ie/library/">https://www.opr.ie/library/</a>
Surface Water	<a href="http://www.catchments.ie">http://www.catchments.ie</a> <a href="https://gis.epa.ie/EPAMaps/Water">https://gis.epa.ie/EPAMaps/Water</a>
Green Procurement	<a href="https://www.epa.ie/publications/circular-economy/resources/green-public-procurement-guidance.php">https://www.epa.ie/publications/circular-economy/resources/green-public-procurement-guidance.php</a>

### *The Environmental Sensitivity Mapping (ESM) WebTool*

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

***EPA SEAGIS Search and Reporting Tool***

Our SEA WebGIS Tool has is publicly available at <https://gis.epa.ie/EPAMaps/SEA>. It allows users 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.

***The Office of the Planning Regulator (OPR)***

As mentioned above in the Climate Change / Climatic Factors subsection, one of the statutory functions of the OPR is to evaluate and assess local authority development plans. A further statutory role of the OPR relates to research, training and public awareness. The relationship between SEA and plan-making is an area identified for further research and training, by both the EPA and OPR. The OPR works closely with the EPA and other agencies in driving innovation and learning in order to achieve shared objectives.

To that end, the OPR has developed a number of resources on their website including an online planning library, webinars and research papers. <https://www.opr.ie/research-and-training/>

## Appendix II: Key national & regional plans and programmes<sup>6</sup>

<b>National</b>	
<i>Planning</i>	<ul style="list-style-type: none"> <li>- National Planning Framework (DHLGH)</li> <li>- Rural Development Programme (DAFM)</li> <li>- Urban Development &amp; Building Heights Guidelines for Planning Authorities (DHLGH)</li> </ul>
<i>Agriculture</i>	<ul style="list-style-type: none"> <li>- CAP Strategic Plan 2023-2027 / FoodWise 2025 / Agri Food Strategy 2030 (DAFM)</li> </ul>
<i>Biodiversity</i>	<ul style="list-style-type: none"> <li>- National Biodiversity Plan (DHLGH)</li> <li>- National Peatland Strategy, SAC Raised Bog Management Plan (DHLGH)</li> </ul>
<i>Climate</i>	<ul style="list-style-type: none"> <li>- Climate Action Plan 2019 (DECC)</li> <li>- Sectoral Climate Change Adaptation Strategies and Low Carbon Roadmaps</li> <li>- National Mitigation Plan (DECC)</li> <li>- National Adaptation Framework (DECC)</li> <li>- National Policy Position on Climate Action and Low Carbon Development (DECC)</li> <li>- EU Climate Adaptation Strategy 2021</li> </ul>
<i>Communications</i>	<ul style="list-style-type: none"> <li>- National Broadband Plan (DECC)</li> </ul>
<i>Energy</i>	<ul style="list-style-type: none"> <li>- National Renewable Electricity Policy Framework (in preparation DECC)</li> <li>- Grid 25 Implementation Strategy (Eirgrid)</li> <li>- Framework for Alternative Fuel Infrastructure in Transport (DoT)</li> <li>- Offshore Renewable Energy Development Plan (DECC)</li> <li>- National Bioenergy Plan (DECC)</li> </ul>
<i>Forestry</i>	<ul style="list-style-type: none"> <li>- National Forestry Programme / Forestry Policy Review (DAFM)</li> </ul>
<i>Landscape</i>	<ul style="list-style-type: none"> <li>- National Landscape Strategy (DHLGH)</li> </ul>
<i>Tourism</i>	<ul style="list-style-type: none"> <li>- 10 Year Tourism Strategy (Fáilte Ireland)</li> </ul>
<i>Transport</i>	<ul style="list-style-type: none"> <li>- Smarter Transport / Strategic Framework for Integrated Land Transport (DoT)</li> <li>- National Greenway Strategy (DoT)</li> </ul>
<i>National Overview</i>	<ul style="list-style-type: none"> <li>- State of the Environment Report 2020 (EPA)</li> </ul>
<i>Waste</i>	<ul style="list-style-type: none"> <li>- Waste Action Plan for a Circular Economy (DECC, 2020)</li> </ul>
<i>Water</i>	<ul style="list-style-type: none"> <li>- Draft National Hazardous Waste Management Plan (EPA, in preparation)</li> <li>- National River Basin Management Plan for Ireland (DHLGH)</li> <li>- National Marine Planning Framework (DHLGH)</li> <li>- Seafood Operation Programme / Strategic Aquaculture Programme (DAFM)</li> <li>- Harnessing Our Ocean Wealth (DAFM)</li> <li>- Water Services Strategic Plan (Irish Water)</li> <li>- Capital Investment Programme (Irish Water)</li> <li>- Draft Water Resources Management Plan (Irish Water)</li> <li>- National CFRAMS Programme (OPW)</li> </ul>
<b>Regional</b>	
<i>Planning</i>	<ul style="list-style-type: none"> <li>- Regional Spatial and Economic Strategies</li> <li>- Shannon Integrated Framework Plan</li> </ul>
<i>Energy</i>	<ul style="list-style-type: none"> <li>- County Renewable Energy / Wind Energy Strategies</li> </ul>
<i>Forestry</i>	<ul style="list-style-type: none"> <li>- Forestry and Freshwater Pearl Mussel Plan (DAFM, in preparation)</li> </ul>
<i>Tourism</i>	<ul style="list-style-type: none"> <li>- Wild Atlantic Way</li> <li>- County Tourism Strategies / Visitor Experience Development Plans</li> </ul>
<i>Transport</i>	<ul style="list-style-type: none"> <li>- Shannon Tourism Masterplan</li> <li>- Transport Strategy for Greater Dublin Area</li> <li>- National Investment Framework for Transport Investment</li> <li>- Metropolitan Area Transport Strategies</li> </ul>
<i>Waste</i>	<ul style="list-style-type: none"> <li>- Regional Waste Management Plans</li> </ul>
<i>Water</i>	<ul style="list-style-type: none"> <li>- Relevant CFRAMS Flood Risk Management Plans</li> <li>- Pollution Reduction Programmes for Shellfish Waters</li> </ul>

<sup>6</sup> Plan-makers should identify key relevant plans/programmes/strategies in the SEA. The above list is indicative only; all of the above may not be relevant to a particular plan.

