

Fullname Carl Strickland

Email [REDACTED]

What area does your submission relate to?

Environmental Assessments

Your comments

Proper environmental assessments are currently not carried out for large scale Strategic developments. A proper assessment should comply to both the spirit and law of the Habitats Directive (Article 6 (3)(4)). The Habitats directive notes via ECJ rulings that assessment should not be salami sliced if they cumulatively impact an SAC. (EG.. Knocksink Wood...intrain and proposed developments). The current compliance adhered by WCC when publishing development plan is to conduct a high level "Natura 2000 Appropriate Assessment" (AA). This is too light. An EIAR should be produced where there are large and multiple zonings close to an SAC, especially a Priority SAC. Developers use an AA to screen their environmental obligations and often use the excuse of 'sub threshold' to avoid producing a proper EIAR. I am concerned local and central planning bodies interpret the EU Habitats directive very lightly in order to avoid development delays at the risk of damage to sensitive Priority SACs. Ireland is currently underperforming in its environmental governance and I would WCC development plan to be more stringent in its environmental assessments within your plan.

CreatedOn

2020-01-02