



Submission to:

Department of Housing, Planning,
Community and Local Government

Transposition of 2014 EIA Directive (2014/52/EU) in the Land Use
Planning and EPA Licensing Systems

Key Issues Consultation Paper

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The Institute of Public Health in Ireland

The remit of the Institute of Public Health in Ireland (IPH) is to promote cooperation for public health between the Republic of Ireland and Northern Ireland in the areas of research and information, capacity building and policy advice. Our approach is to support Departments of Health and their agencies in both jurisdictions, and maximise the benefits of all-island cooperation to achieve practical benefits for people in Northern Ireland and the Republic of Ireland.

Our interest in this area comes from both the use of impact assessment as a regulatory tool and the potential impacts of planning and development on public health. With regard to the former we have developed a body of work on health impact assessment specifically and on health in other impact assessments including Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA). Our published work can be found at www.publichealth.ie/publications

IPH welcomes the opportunity to respond to this consultation. Our response focuses on the proposed approaches relating to population and human health on pages 11-12 of the Key Issues Paper. We believe a more holistic approach to health in EIA as supported by the comments below may enhance partnership work with public health stakeholders and practitioners and prevent duplication by reducing the need for separate health impact assessments.

IPH Response to proposed approach to Population and Human Health

IPH would welcome greater recognition of the opportunity provided in Article 3(1) to broaden the understanding of health in the conduct of Environmental Impact Assessments. A significant body of research, including Irish and international studies, has found that the current limited interpretation of 'human beings' in EIA results in a generally weak section where:

- Health is considered in terms of single exposures only;
- Cumulative impacts are not given due consideration;
- A lack of comparison between predicted emissions and baseline health;
- A community profile may be only loosely described and;
- Potential impacts are not routinely considered in any meaningful way.ⁱ

In practice this means that potential impacts on a particular community's health may not be given due consideration. Furthermore sub-groups within that community who may be at higher risk of a negative health outcome due to pre-existing conditions are less likely to be identified.

There is a strong evidence base to support a broader interpretation of population and human health in the conduct of EIA. Health impacts of factors such as transport, employment and industry, housing and greenspace should be routinely incorporated into relevant EIAs particularly with regard to land use planning. A requirement to take into account lifestyles, access to and use of services and social factors in the assessment process would enable broader health consideration beyond environmental hazards to be included. Taking this approach would also facilitate identifying aspects of a project that may have conflicting effects on human health, for example improved air quality but reduced social cohesion or access to services.ⁱⁱ

Furthermore, national policy supports an understanding of population and human health that spans environmental, social and economic determinants of health and wellbeing and the interrelationship between these. Healthy Ireland, the cross-departmental Framework for improved health and wellbeing, sets out

a vision for 'A Healthy Ireland, where everyone can enjoy physical and mental health and wellbeing to their full potential, where wellbeing is valued and supported at every level of society and is everyone's responsibility'. Its four goals: Better health; Less inequality; Health protection and; Intersectoral action have the potential to be influenced through better consideration of health in EIA. It also includes a specific action to 'Further integrate and improve consideration of human health and environmental protection activities across EPA functions and functions of related agencies and sectors.'ⁱⁱⁱ

IPH considers that, in light of the available evidence, adopting a 'business as usual' stance presents a missed opportunity to maintain and improve the health and wellbeing of the population.

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References

i Interpretation of health in EIA

- Investigation into the Assessment of Health Impacts within National Environmental Regulation Processes, Report commissioned by the Environmental Protection Agency. Available at <http://www.epa.ie/pubs/reports/research/health/assessmentofhealthimpactsreport.html>
- Understanding the links between the Environment, Human Health and Wellbeing, Report for a STRIVE funded project. Available at <http://www.epa.ie/pubs/reports/research/health/ercreport15.html>
- (IMP)3 Policy Options D 5.2 Final Report, Project funded by the European Community Sixth Framework Programme, Available at http://ec.europa.eu/environment/archives/eia/eia-studies-and-reports/pdf/D5_2-IMP3-FinalReport.pdf

ii Support for better consideration of health in EIA

- Healthy transport = Healthy lives. London: British Medical Association, 2012.
- Environmental burden of disease associated with inadequate housing. Bonn: WHO Regional Office for Europe, 2011.
- Urban green spaces and health. Copenhagen: WHO Regional Office for Europe, 2016.

iii Healthy Ireland. A framework for improved health and wellbeing 2013-2025.