



Administrative Officer,  
Forward Planning,  
Planning Department,  
Longford County Council,  
Aras an Chontae,  
Great Weather Street,  
Co. Longford  
N39 NH56

17<sup>th</sup> October 2024

**RE: Publication of the Draft Longford Town Local Area Plan 2025-2031**

Dear Sir/Madam,

Further to the notice given to this Department of the publication of an invitation for submissions on the Draft Longford Town LAP (**the draft LAP**), the following submission outlines its observations in respect of a number of policy areas for which the Department is responsible.

The Government is committed to achieving climate neutrality no later than 2050 with a 51% reduction in GHG emissions by 2030. These legally binding objectives are set out in the Climate Action and Low Carbon Development (Amendment) Act 2021 (**the Climate Act**). The Climate Act supports Ireland's transition to net-zero and the achievement of a climate neutral economy no later than 2050. It also establishes a legally binding framework with clear targets and commitments, to ensure the necessary structures and processes are in place to deliver national, EU and international climate goals and obligations in the near and long term. Against this background, strategies must be devised to reduce and manage climate change risks through a combination of mitigation and adaptation responses, both in the medium and longer term.



The Department of the Environment, Climate and Communications' vision of a climate neutral, sustainable, and digitally connected Ireland will be achieved by collaboratively delivering policies and programmes to empower people, communities, and businesses to continue the transition to a better quality of life for current and future generations. This vision also aligns with the UN 2030 Agenda for Sustainable Development and the 17 SDGs, which provide a plan of action for people, prosperity and planet, with the commitment to leave no-one behind.

The step change in our ambition from a low carbon to climate neutral Ireland requires strong leadership across Government and the wider public sector. This Department will drive the climate agenda by engaging with local authorities to build resilience in citizens, communities, and business to overcome climate adaptation challenges, maximising climate mitigation and adaptation opportunities and facilitating the transition to a truly Circular Economy.

This will also help to deliver on the Government's 'whole-of-society' approach for the successful implementation of the SDGs, driving in particular the achievement of Goal 7 on Affordable and Clean Energy, Goal 12 on Responsible Consumption and Production, and Goal 13 on Climate Action. Achieving the SDGs overall will require fundamental changes in many parts of Irish life, but it is also an opportunity to create a cleaner, greener, fairer economy and society.

The Department asks that you take the material outlined in the following sections into consideration when finalising the Longford town Local Area Plan, which align with our Statement of Strategy for the period 2024-2025, Le Chéile 25, which itself sets out our vision, mission, and six strategic goals in key policy areas.

The Department also asks that you take into consideration the framework of Agenda 2030, the Sustainable Development Goals (SDGs) and their respective targets, in the overall drafting of the Plan, and in relation to the specific areas outlined below.



## **The Longford County Development Plan (LCDP) 2021-2027**

The Planning and Development Acts 2000 (as amended) requires the LAP to be consistent with the objectives of the Development Plan and its Core Strategy. In this regard, DECC notes the positive objectives of the LCDP 2021-2027, which integrates climate change adaptation considerations into all functions and activities of the Local Authority. Objectives at County level for climate action, renewable energy infrastructure, communications infrastructure inter alia should be reflected by objectives and actions of the LAP, as relevant for the plan area, to support implementation of national, regional and county level policy on these themes.

The following recommendations are an opportunity to strengthen objectives of the LAP.

### **Climate Action**

The Climate Action Plan 2024 (CAP24) is the third annual update to Ireland's Climate Action Plan. The CAP24 lays out a roadmap of actions to meet our national climate objective of pursuing and achieving the transition to a climate resilient, biodiversity rich, environmentally sustainable and climate neutral economy by 2050. The draft LAP makes no reference to the CAP24.

However, the Department notes the policy and objectives in the respective County Development Plan (**CDP**) which:

- Supports the implementation and achievement of European, national, regional and local objectives for climate adaptation and mitigation, including the Climate Action Plan.<sup>1</sup>

Having regard to same, the Local Authority should ensure that the LAP includes reference to, supports the implementation of and is consistent with the CAP24, in accordance with Section 15(1) of the Climate Action and Low Carbon Development Act, 2015 (as amended).

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<sup>1</sup> CPO 3.1, Chapter 3 Climate Change, Longford County Development Plan 2021-2027



### **Recommendation 1:**

The Department recommends that an objective and / or policy is included in the LAP to support the implementation of CAP24 (and annual revisions).

The Department welcomes the inclusion in the draft LAP of:

- the series of objectives addressing the mitigation and adaptation of the effects of climate change, and.<sup>2</sup>
- the dedicated chapter on climate change, which aims to ensure Longford Town becomes climate resilient town by promoting the economic, social and environmental benefits of low-carbon development, creating an integrated green infrastructure network, prioritising sustainable mobility and building a sustainable densities in appropriate locations.<sup>3</sup>

The Department notes the new National Adaptation Framework (NAF) was approved by Government on the 5<sup>th</sup> of June 2024.

### **Recommendation 2:**

The Department recommends that an objective and /or policy is included in the LAP to support the implementation of the NAF.

### **Local Authority Climate Action Plan**

The Longford County Council Climate Action Plan 2024-2029 (**Longford LACAP**) was approved on the 14<sup>th</sup> of February 2024. The Longford LACAPs central aim are aligned with the Government's national climate objective.

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<sup>2</sup> Section 15.8 Climate Change Objectives, Draft Longford Town Local Area Plan 2025-2031

<sup>3</sup> Chapter 15 Climate Change, Draft Longford Town Local Area Plan 2025-2031



Under section 10(2)(n) of the Planning and Development Act, 2000 (as amended), a CDP must, when being prepared, take into account the LACAP. While this provision is relevant to Development Plans, the preparation of the draft LAP provides a positive opportunity to support the implementation of the LCDP 2021-2027 objectives for climate action and the Longford LACAP.

The Department recommends that the Local Authority ensures that the draft LAP is aligned with the Longford LACAP. It is noted that Longford Town has been identified as the County's Decarbonising Zone (**DZ**) in the Longford LACAP, for a number of reasons including Longford Town meeting the population requirement.

The area of the Longford Town DZ is aligned the draft LAP. The Longford LACAP is centred around five thematic areas of:

- Governance and Leadership
- Built Environment and Transport
- Natural Environment and Green Infrastructure
- Communities Resilience and Transition
- Sustainability and Resource Management.

It is important that the DZ priority areas and related actions are appropriately reflected in the policies and objectives of the Draft LAP, thereby ensuring consistency and alignment between both Plans.

As such, the Department welcomes the objective of the draft LAP, to:

- *'Support the implementation of Longford County Council's Climate Action Plan 2024-2029 any other subsequent Climate related document deemed relevant by the Planning Authority'.<sup>4</sup>*

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<sup>4</sup> CC 04, Chapter 15 Climate Change, Draft Longford Town Local Area Plan 2025-2031



- *‘Support the delivery of the ‘Decarbonisation Zone’ in Longford Town and associated implementation plan promoting measures to reduce Greenhouse Gas (GHG) emissions and improve general environmental conditions in the area’.*<sup>5</sup>

### **Recommendation 3:**

The Department recommends that the LAP include objectives and / or policies to ensure the implementation of DZ priority areas and related actions, thereby ensuring consistency and alignment between both Plans.

### **Renewable Energy**

The National Development Plan 2021-2023 (NDP) and the CAP24 commits to increase Ireland’s proportion of electricity from renewable sources to 80% by 2030. This measure will be achieved through a combination of onshore and offshore renewable sources supported by various support schemes, including the Renewable Electricity Support Scheme (RESS), the Small-Scale Renewable Electricity Support Scheme (SRESS) and the Micro-Generation Support Scheme (MSS)

Small-scale and community generation will be supported via the SRESS. SRESS offers a simpler route to market for community and other small-scale renewable projects. Unlike RESS, the SRESS is not auction-based and support for projects will be provided through a guaranteed tariff. The MSS delivers a range of measures to support micro-generation (both for self-consumption and for export).

The Local Authority should note the updates to the national policy context, in particular the CAP24, including government’s renewable electricity generation targets: Solar PV Capacity targets of 8GW by 2030. Onshore wind capacity of 9GW by 2030, in addition to the commitment to supporting at least 500 MW of local community-based renewable energy projects and increased levels of new micro-generation and small-scale generation.

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<sup>5</sup> CC 16, Chapter 15 Climate Change, Draft Longford Town Local Area Plan 2025-2031



The Department notes the positive objectives of the LCDP 2021-2027 concerning the support and promotion of renewable energy, including:

- *‘Support and encourage the sustainable development of renewable energy auto-production units (the production of energy primarily for on-site usage) for existing and proposed developments in line with relevant design criteria, amenity and heritage considerations and the proper planning and sustainable development of the area’.*<sup>6</sup>
- *‘Support and encourage the installation of solar collectors and panels for the production of heat or electricity in residential and commercial buildings, in line with relevant design criteria’.*<sup>7</sup>

The Department welcomes the inclusion of objectives (including EC 06, CC 07 and CC21) which generally align with these objectives. It is crucial that all future development seek to increase their contribution to the national renewable electricity generation target and, where possible, aim for developments that are carbon or energy use neutral.

### **Built Environment and Heating**

The CAP24 adopts measures to support the electrification of heating by strengthening our existing Building Regulations and implementing an ambitious National Residential Retrofit Plan. Targets set are 45,000 existing dwellings using heat pumps by 2025, and 400,000 by 2030. The National Residential Retrofit Plan commits the Government to retrofit 120,000 dwellings to B2 or cost optimal by 2025 and 500,000 by 2030.

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<sup>6</sup> CPO 5.140, Chapter 5 Transport, Infrastructure, Energy and Communications, Longford County Development Plan 2021-2027

<sup>7</sup> CPO 5.159, Chapter 5 Transport, Infrastructure, Energy and Communications, Longford County Development Plan 2021-2027



The Department notes policy of the Eastern and Midland Regional Spatial and Economic Strategy (RSES) 2022-2032 and the LCDP 2021-2027, which states:

- *‘Local authorities shall include policies in statutory land use plans to promote high levels of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retro fitting of energy efficiency measures in the existing building stock and energy efficiency in traditional buildings.*

*All new buildings within the Region will be required to achieve the Nearly Zero-Energy Buildings (NZEB) standard in line with the Energy Performance of Buildings Directive (EPBD)’.*<sup>8</sup>

- *‘Set out measures to reduce vacancy and the underuse of existing building stock and support initiatives that promote the reuse, refurbishment and retrofitting of existing buildings within urban centres’.*<sup>9</sup>

The objective of the draft LAP to *‘support high level of energy conservation of energy conservation, energy efficiency and the use of renewable energy sources in existing buildings, including retrofitting of appropriate energy efficiency measures in the existing building stock, and to actively retrofit Longford County Council’s housing stock to a B2 Building Energy Rating (BER)’* is welcomed by the Department.<sup>10</sup>

The Department would encourage the Local Authority to consider implementing policy to support the ambitions of the National Residential Retrofit Plan, in particular, the development of the electrification of heating, having regard to the CAP24, Longford CDP, and the RSES.

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<sup>8</sup> Regional Policy Objective 7.40, Eastern and Midlands Regional Spatial & Economic Strategy

<sup>9</sup> CPO 6.6, Chapter 6 Regeneration, Longford County Development Plan 2021-2027

<sup>10</sup> CC 21, Chapter 15 Climate Change, Draft Longford Town Local Area Plan 2025-2031





## Compact Growth and District Heating

When preparing the draft LAP, due regard should be given to the ambition of the National Planning Framework, Regional Spatial and Economic Strategy and the CDP which requires the achievement of compact growth and explicitly recognises the potential for such compact growth to facilitate the development of low carbon district heating.

Examples include:

- National Planning Framework: *‘District heating networks will be developed, where technically feasible and cost effective, to assist in meeting renewable heat targets and reduce Ireland’s GHG emissions’.*<sup>11</sup>
- Regional Policy Objective 7.38: *‘Local authorities shall consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted. A feasibility assessment for district heating in local authority areas shall be carried out and statutory planning documents shall identify local waste heat sources’.*<sup>12</sup>
- CPO 3.11: *‘Consider the use of heat mapping to support developments which deliver energy efficiency and the recovery of energy that would otherwise be wasted’.*<sup>13</sup>
- CPO 3.12: *‘Carry out a feasibility assessment for district heating and any subsequent Local Area Plans or other statutory planning documents shall identify local waste heat sources, where appropriate’.*<sup>14</sup>

In that regard, we note and support objectives of the Local Authority which:

- supports and encourages compact growth.<sup>15</sup>

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<sup>11</sup> National Strategic Outcome 9, [National Planning Framework](#), Pg 149

<sup>12</sup> Regional Policy Objective 7.38, Eastern and Midlands Regional Spatial & Economic Strategy

<sup>13</sup> CPO 3.11, Chapter 3 Climate Change, Longford County Development Plan 2021-2027

<sup>14</sup> CPO 3.12, Chapter 3 Climate Change, Longford County Development Plan 2021-2027

<sup>15</sup> CS 03, Chapter 5 Core Strategy Compliance, Draft Longford Town Local Area Plan 2025-2031



- supports the delivery of facilities needed to divert waste away from landfill and promote the prevention, reuse, recycling and recovery of materials (including heat from waste).<sup>16</sup>

#### **Recommendation 4:**

The Department recommends that the Local Authority examine the potential of district heating including district heating derived from waste heat, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies. As such, policies in support of same are encouraged in the draft LAP.

We would draw the attention of the Councils to the National Heat Study, carried out by the Sustainable Energy Authority and published in 2022. The Study provides a comprehensive assessment of the options available to decarbonise Ireland's energy used for heating and cooling homes, businesses, and industry. In examining potential targets for district heating rollout, consideration should be given to the outcomes of the National Heat Study.

#### **Circular Economy and Waste**

New guidance in respect of construction waste management, titled *“Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects”* published by the Environmental Protection Agency in 2021. The purpose of these guidelines is to provide a practical approach to construction and demolition (C&D) waste, which is informed by best practice in the prevention and management of such wastes and resources from design through to construction and deconstruction.

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<sup>16</sup> CS 23, Chapter 15 Climate Change, Draft Longford Town Local Area Plan 2025-2031



The implementation of this best practice is consistent with the circular economy consistent with Government policy under *Whole of Government Circular Economy Strategy 2022 – 2023* and *The Circular Economy Programme 2021-2027* (EPA). The circular economy is also supported under CPO 5.123 of the LCDP 2021-2027.<sup>17</sup>

The Department would welcome the inclusion of reference to these guidelines in the LAP.

#### **Recommendation 5:**

The Department recommends that the LAP includes objectives and / or policies to support circular economy principles and includes reference to the EPA's *Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects* (2021).

In this regard, the Department would advise the Local Authority to consult with their respective Regional Waste Management Planning Office regarding development of the LAP, particularly in relation to any policies which may preclude the continued use of existing waste management infrastructure or development of new waste management infrastructure.

#### **Telecommunications**

The facilitation and support of the development of telecommunications infrastructure is crucial to the development of the modern economy, including for key towns such as Longford Town. In this regard National Strategic Objective 6 of the National Development Plan 2021-2023, states that high-quality, secure, and reliable connectivity to global telecommunications networks is of significant strategic importance to the Irish State. In addition, *Harnessing Digital – the Digital Ireland Framework* (Department of the Taoiseach, 2022) recognises the importance on supporting 5G rollout across all populated areas of Ireland by 2030.

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<sup>17</sup> CPO 5.123, Chapter 5 Transport, Infrastructure, Energy and Communications, Longford County Development Plan 2021-2027



### **Recommendation 6:**

The Department recommends that the draft LAP includes reference to and includes objectives and /or policies to support and facilitate the development telecommunications infrastructure in line with Government policy, including the rollout of 5G.

### **Geoscience Data**

A list of Geological Survey Ireland's (**GSI**) publicly available datasets relevant to planning, Environmental Impact Assessment (**EIA**) and Strategic Environmental Assessment (**SEA**) processes, following European Union (Planning and Development) (Environmental Impact Assessment) Regulations 2018(S.I. No. 296 of 2018), is attached to this submission.

The list provides the datasets available for the following areas:

- Land & Soil
- Water
- Landscape
- Air and
- Climate

The maps and data listed in the attached chart are available on the GSI map viewer. Please read all disclaimers carefully when using GSI data.

The Department encourages the Local Authority to consider the following datasets for the specified sections of the LAP listed below:

- 11 Climate Change-Strategic Aim:<sup>18</sup> GSI's datasets for [Geothermal Energy](#)
- 11.2 Biodiversity and Natural Heritage:<sup>19</sup> GSI's datasets on [Geo \(Natural Heritage\)](#)

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<sup>18</sup> 11. Climate Change-Strategic Aim, Chapter 4 Strategic Visions and Aims, Draft Longford Town Local Area Plan 2025-2031

<sup>19</sup> 11.2 Biodiversity and Natural Heritage, Chapter 11 Natural Heritage and Green Infrastructure, Draft Longford Town Local Area Plan 2025-2031



- 11.4.4 Geological Sites:<sup>20</sup> GSI's datasets on [Geoheritage and County Geological Sites](#), as listed in the Longford CDP
- 15.3 County Longford Climate Adaptation Strategy 2019:<sup>21</sup> GSI's datasets on climate related issues such as flooding, historic and predicted, along with other natural geohazards that may be considered under climate adaption, found [here](#).

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<sup>20</sup> 11.4.4 Geological Sites, Chapter 11 Natural Heritage and Green Infrastructure, Draft Longford Town Local Area Plan 2025-2031

<sup>21</sup> 15.3 County Longford Climate Adaptation Strategy 2019, , Chapter 15 Climate Change, Draft Longford Town Local Area Plan 2025-2031



## Conclusion

We would be grateful if Longford County Council would take these matters under consideration in the drafting of the Longford Town Local Area Plan 2025-2031.

Department officials can make themselves available for a discussion on any matters raised in this submission or any other matters within the remit of the Department of the Environment, Climate and Communications, relevant to the preparation of this plan.

Officials can provide support to the County Councils in the following areas:

- Climate Action, Engagement and Adaptation
- Energy Generation and Networks
- Energy Use / Demand in the Built Environment
- The Circular Economy
- Communications
- Environmental Policy and Governance
- Waste and Natural Resources (including geosciences)
- UN Agenda 2030 and the Sustainable Development Goals (SDGs)

Please direct any requests for further consultation to [PlanningNotifications@decc.gov.ie](mailto:PlanningNotifications@decc.gov.ie)

Yours Sincerely,

Planning Advisory Division

Department of Environment, Climate and Communications

Encl.

1. List of Recommendations
2. Supplementary Submission from Geological Survey Ireland.



## **List of Recommendations**

### **Recommendation 1:**

The Department recommends that an objective and / or policy is included in the LAP to support the implementation of CAP24 (and annual revisions).

### **Recommendation 2:**

The Department recommends that an objective and /or policy is included in the LAP to support the implementation of the NAF.

### **Recommendation 3:**

The Department recommends that the LAP include objectives and / or policies to ensure the implementation of DZ priority areas and related actions, thereby ensuring consistency and alignment between both Plans.

### **Recommendation 4:**

The Department recommends that the Local Authority examine the potential of district heating including district heating derived from waste heat, where available, technically feasible and cost effective and commit to carrying out a feasibility exercise and the use of heat mapping in support of same in the draft policies. As such, policies in support of same are encouraged in the draft LAP.

### **Recommendation 5:**

The Department recommends that the LAP includes objectives and / or policies to support circular economy principles and includes reference to the EPA's *Best practice guidelines for the preparation of resource & waste management plans for construction & demolition projects* (2021).



**Recommendation 6:**

The Department recommends that the draft LAP includes reference to and includes objectives and /or policies to support and facilitate the development telecommunications infrastructure in line with Government policy, including the rollout of 5G.





Longford County Council  
Áras an Chontae  
Great Water Street  
Longford  
N39 NH56

20<sup>th</sup> September 2024

**Re: Longford Town Draft Local Area Plan 2025-2031**

**Your Ref: N/A**

**Our Ref: 24/333**

Dear Planning Section,

Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and interpretation and gather various data for that purpose. Please see our [website](#) for data availability.

With reference to correspondence, concerning the Longford Town Draft Local Area Plan 2025-2031, we recommend using our various data sets when conducting the EIAR, SEA, planning and scoping processes for developments, plans and policies. For more detailed information on how to access this data please access 'Data and Maps' [Data & Maps \(gsi.ie\)](#) on our 'Geoscience for planning' webpage. Use of our data or maps should be attributed correctly (please refer to each individual dataset's metadata for correct attribution).

For specific data available for Environmental Assessment and Planning topics please follow this link [[Data by Environmental Assessment and Planning Topic \(gsi.ie\)](#)], where you will find our data arranged by environmental assessment topic as illustrated below:

|   |   |   |
|---|---|---|
| <b>Land and soils</b><br><i>Soil</i> <ul style="list-style-type: none"> <li>Subsoils (Quaternary Geology)</li> <li>Tellus Geochemistry</li> <li>Geotechnical</li> </ul> <i>Geology</i> <ul style="list-style-type: none"> <li>Bedrock</li> <li>Geophysics</li> <li>Bedrock &amp; Quaternary 3D</li> </ul> | <b>Water</b><br><i>Groundwater</i> <ul style="list-style-type: none"> <li>Aquifers GW vulnerability, GWPSs (GWPPs)</li> </ul> <i>Surface water</i> <ul style="list-style-type: none"> <li>Tellus Geochemistry</li> </ul> <i>Estuarine &amp; marine waters</i> <ul style="list-style-type: none"> <li>Marine and coastal</li> </ul> <i>Flooding</i> <ul style="list-style-type: none"> <li>GWClimate</li> <li>Karst</li> </ul> | <b>Climate Change</b><br><i>Carbon accounting / Carbon balance</i> <ul style="list-style-type: none"> <li>Geothermal</li> <li>Carbon capture and storage</li> </ul> <i>Climate change trends</i> <ul style="list-style-type: none"> <li>National coastal change assessment</li> </ul> |
| <b>Cultural Heritage</b><br><i>Archaeology</i> <ul style="list-style-type: none"> <li>Cherish</li> </ul> <i>Underwater Archaeology</i> <ul style="list-style-type: none"> <li>Shipwrecks</li> </ul>   | <b>Material Assets</b><br><i>Built Services</i> <ul style="list-style-type: none"> <li>Natural resources (Minerals &amp; Aggregates)</li> <li>Active quarries</li> </ul>  | <b>The Landscape</b><br><i>Landscape Appearance &amp; Character</i> <ul style="list-style-type: none"> <li>Physiographic units</li> </ul> <i>Historical landscapes</i> <ul style="list-style-type: none"> <li>Historic mines</li> </ul>   |
| <b>Other Relevant Data</b>  |   |   |
| <i>Natural (Geo) hazards</i> <ul style="list-style-type: none"> <li>Landslide Susceptibility Mapping</li> <li>Groundwater flooding</li> <li>Coastal vulnerability</li> <li>Subsidence</li> <li>Radon</li> </ul>   | <i>Natural heritage</i> <ul style="list-style-type: none"> <li>Geoheritage (County Geological Sites)</li> <li>Dimension Stone/Stone Built Ireland</li> </ul>  |   |



### **Specific Comments/Observations**

We have completed the observations section of the attached spread sheet that was shared with us, and we hope that this is useful in highlighting some of our more relevant datasets listed above.

We also note reference to our previous submission (2023, our ref 23/82) in relation to the SEA scoping report in the current SEA report. We are pleased to see inclusion of our comments as Environmental Protection Observations (EPOs) in the SEA report and the Draft LAP.

You may also find our flood risk maps useful for flood risk assessment, these include both historic and predictive maps. Please follow the links above to these datasets.

We encourage you to use any other data sets referenced above for use in your Local area plan and associated environmental assessments.

If we can be of any further help, please do not hesitate to contact me Clare Glanville, or my colleague Trish Smullen at [GSIPlanning@gsi.ie](mailto:GSIPlanning@gsi.ie).

Yours sincerely,

Dr. Clare Glanville  
**Senior Geologist**  
**Geoscience for Planning Programme**  
**Geological Survey Ireland**

Trish Smullen  
**Geologist**  
**Geoscience for Planning Programme**  
**Geological Survey Ireland**

The publicly available data referenced/presented here, should in no way be construed as Geological Survey Ireland support for or objection to the proposed development or plan. The data are made freely available to all and can be used as independent scientific data in assessments, plans or policies. It should be noted that in many cases these data are a baseline or starting point for further site specific assessments.