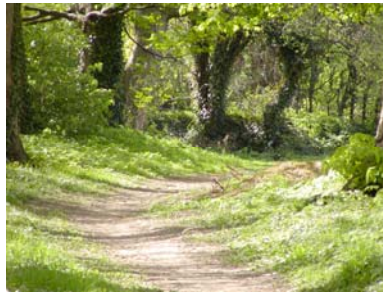


# SEA STATEMENT

ON THE

## SOUTH DUBLIN COUNTY DEVELOPMENT PLAN 2010-2016





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## **SECTION 1 INTRODUCTION**

### **1.1 Purpose of Report**

This is the Strategic Environmental Assessment (SEA) Statement of the South Dublin Development Plan 2010-2016. The main purpose of the SEA Statement is to indicate how environmental considerations, the views of consultees and the recommendations of the Environmental Report have been incorporated in the decision making process in the formulation of the South Dublin Development Plan 2010-2016.

### **1.2 Legislative Context**

The requirement to carry out a Strategic Environmental Assessment stems from the Strategic Environmental Assessment Directive (2001/42/EC) which states:

*'The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans.....with a view to promoting sustainable development.....'*

The Directive was introduced into Irish Law in 2004, through the European Communities (Environmental Assessment of Certain Plans & Programmes) Regulations 2004, S.I. No. 435 of 2004 and the Planning and Development (Strategic Environmental Assessment) Regulations 2004, S.I. No. 436 of 2004.

Article 9 of the SEA Directive (2001/42/EC) provides that the environmental authorities and the public must be provided with an SEA Statement as soon as is practical after a plan is adopted. The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the plan,
- b) how
  - the environmental report,
  - submissions and observations made on the Draft Plan and Environmental Report, and
  - any transboundary consultationshave been taken into account during the preparation of the plan.
- c) the reasons for choosing the plan, as adopted, in the light of the other reasonable alternatives and
- d) the measures selected to monitor the significant environmental effects of implementation of the plan.

### **1.3 Implications of SEA for the Plan Making Process**

In line with the legislation, the South Dublin Development Plan 2010-2016 was required to undergo Strategic Environmental Assessment (SEA). An Environmental Report was prepared in parallel with the production of the Draft Development Plan. The Environmental Report was submitted to the Elected Members alongside the Draft Plan. The purpose of the report was to provide an understanding of the likely environmental consequences of decisions regarding the future accommodation of growth in the county.

Submissions on the Environmental Report and the South Dublin Development Plan 2010-2016 were evaluated at each stage of the process in order to ascertain any further environmental consequences to those already identified. These evaluations were included within the Managers Reports to Council Members on the proposed amendments to the Plan. The Elected Members were required by the legislation to take into account the Environmental Report before the adoption of the Plan.

### **1.4 Production of the SEA**

The Strategic Environmental Assessment of the Draft South Dublin Development Plan 2010-2016 was undertaken internally in the Council by a separate SEA team who closely liaised with the Development Plan Team. Mentoring advice on the SEA process and assessment was provided by CAAS Ltd., Planning and Environmental Consultants.

## **SECTION 2 HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE PLAN**

Environmental considerations were integrated into the Development Plan process at a number of stages in the SEA i.e. the Scoping stage, at the Environmental Report stage and following the submissions and observations from the Environmental Authorities and the public.

In addition, the environmental sensitivities of the County were communicated to the Plan-preparation team on a regular basis from the outset of the Plan preparation process. This process helped identify areas with the most limited carrying capacity within the County and helped ensure that either future growth was diverted away from these areas or that appropriate mitigation measures were integrated into the Plan.

### **2.1 Scoping Report**

A detailed Scoping Issues paper was sent to the statutory Environmental Authorities (the Environmental Protection Agency, the Department of the Environment, Heritage and Local Government and the Department of Communications, Marine and Natural Resources) in December 2009 which noted the environmental issues to be considered, the sources of such information, preliminary environmental objectives and indicators and potential development alternatives. The Environmental Authorities issued detailed responses to the Scoping Issues paper (see Section 3). The issues that arose generally related to the management and potential effects of the development of the County on Natura 2000 site and also noted specific species, areas and sites of concern within the County. The submissions also recommended updated sources of information for use in the Environmental Report. A meeting between representatives of the EPA and SDCC was held on March 2009, and the information provided at this meeting was taken into account during the SEA process.

These issues raised and associated responses were incorporated into the [Scoping Report](#) which was issued in April 2009. The scoping report was taken into account during the preparation of the Environmental Report. The issues and associated responses are dealt with in greater detail in Section 3 of this document.

### **2.2 Environmental Report**

The [Environmental Report](#) is prepared alongside the Development Plan and investigates, describes and evaluates the effects of implementing the Development Plan on the receiving environment. The report also assesses and identifies development alternatives for the County, and identifies the most sustainable strategy. The intention is that the Development Plan should adhere to the preferred development strategy as far as possible.

Overall, the preparation of the Environmental Report influenced the formulation of the Development Plan as follows;

- 1 It raised the awareness of the existing level of environmental information in the County and also the EU and National legislation governing the environment
- 2 It facilitated translating the Baseline environmental information to a GIS basis and in deriving an Environmental Sensitivity Map for the County
- 3 It introduced sixteen Strategic Environmental Objectives (SEOs) that formed the basis for creating Environmental Receptor Targets and Indicators to monitor the environmental impacts of implementing the Development Plan
- 4 It demonstrated the Sustainable/Selective Concentration approach as the best development scenario using assessments of the SEOs and Environmental Sensitivity Analysis
- 5 It provided a transparent assessment of each proposed policy and objective which allowed further fine-tuning to reduce negative environmental impacts

The detail of these influences is expanded on below.

**2.2.1 Baseline:** The Environmental Report contains a range of baseline information in South Dublin County Council area on key environmental headings such as

- 1 Population and Human Health
- 2 Biodiversity (Flora and Fauna)
- 3 Landscape/Geology/Soil
- 4 Agriculture and Forestry
- 5 Water Quality
- 6 Air Quality
- 7 Waste Management
- 8 Material Assets
- 9 Cultural Heritage and
- 10 Climate Change and Sustainability

### **2.2.2 Mapping of Environmental Sensitivities**

Geographical Information System (GIS) software was used in order to weight a number of environmental sensitivities and map them in layers; this allowed for the identification of concentrated areas of sensitivity within the County. Environmental sensitivities are indicated by colours which range from extreme vulnerability (red) to high vulnerability (orange) to moderate vulnerability (yellow) and low vulnerability (grey).

Where the mapping shows a concentration of environmental sensitivities there is an increased likelihood that development will conflict with these sensitivities and cause environmental deterioration. The map (see next page), was utilised in the evaluation of policies, local objectives and in association with the assessment of alternative development scenarios (see Section 4).

**2.2.3 Key Environmental Issues Identified:** The key environmental issues in the South Dublin County area were identified in the Environmental Report as

- 1 Depopulation in older areas and growth at edge of the developed area on greenfield land
- 2 Pressure on Designated Nature Sites (SACs, pNHAs) the SAAO, and in the river valleys and the mountains
- 3 Loss of Landscape Character particularly in the Uplands due primarily to one-off housing
- 4 Need to improve the status of water bodies under the EU Water Framework Directive
- 5 Need to identifying Potential Flooding areas along the Dodder, Liffey and Camac
- 6 Traffic Noise and Movement
- 7 The presence of 3 Seveso Sites in the Naas Road area
- 8 Deficiency in water supply and waste water infrastructure at regional level
- 9 Transport – South Dublin has the lowest % of people travelling to work by Public Transport (school by Bus/ Luas/ Dart) compared to the other Dublin Local Authorities.
- 10 Climate Change and how it is influenced by the Growth of Traffic movement and volumes

The following **Gaps in the Baseline** environmental information were identified in the report

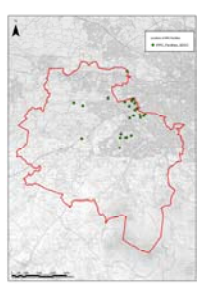
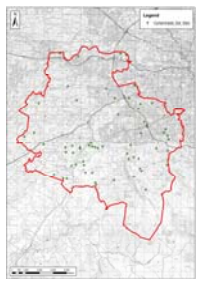
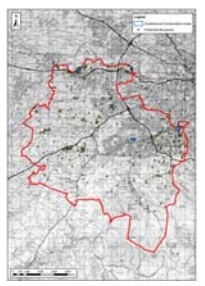
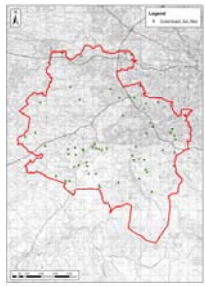
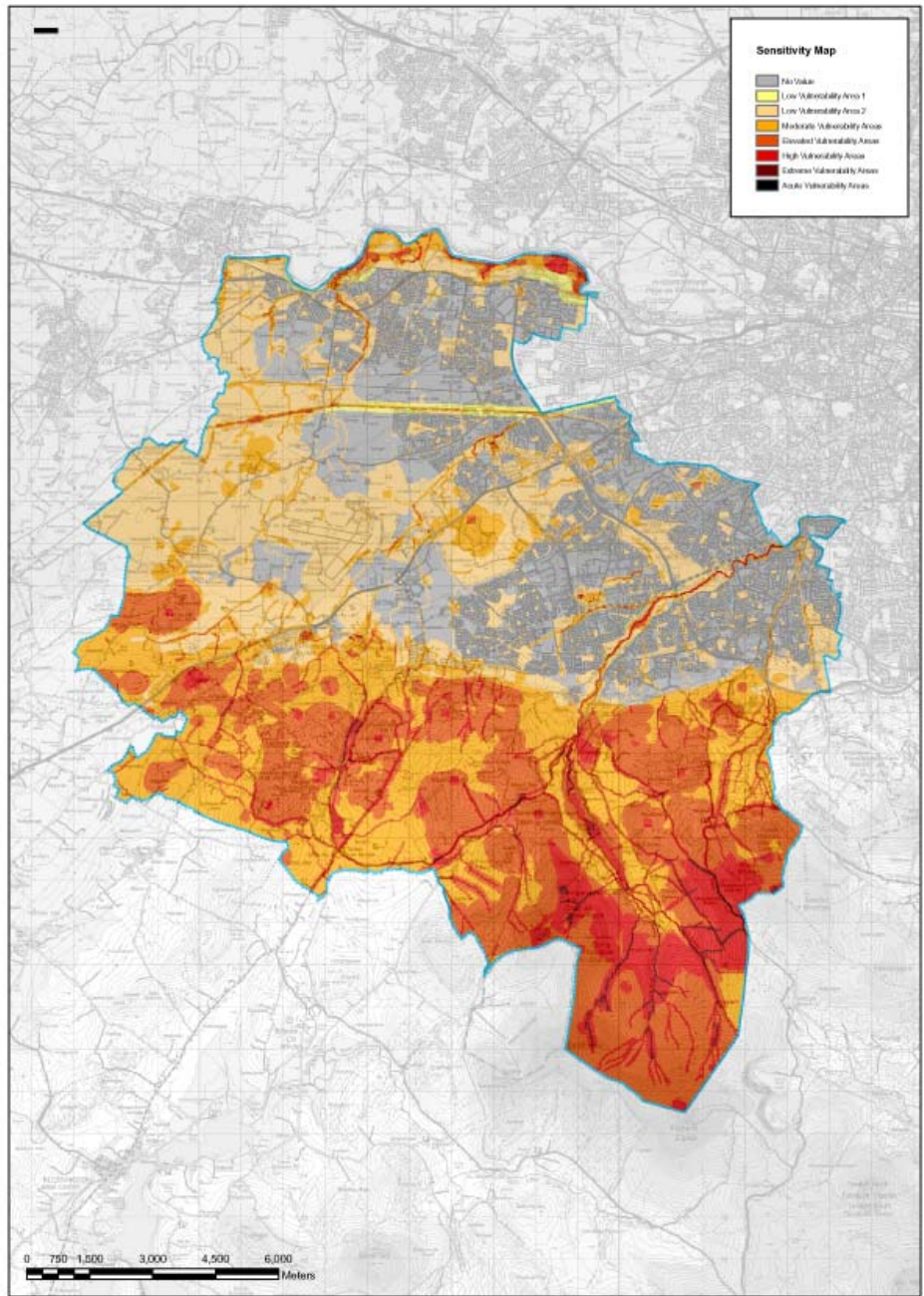
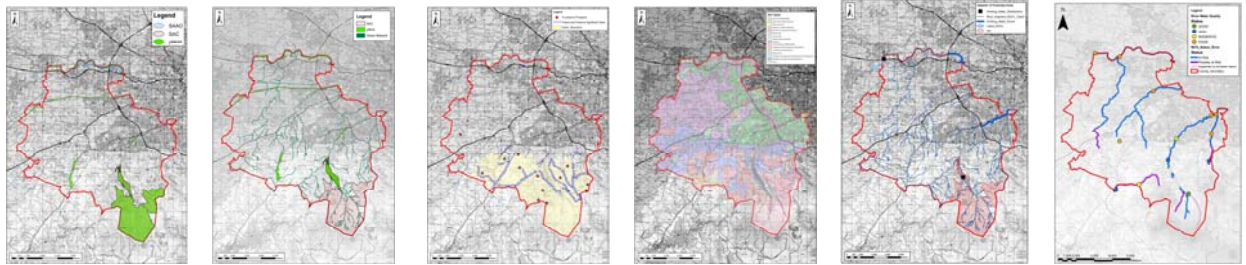
- 1 The lack of a Biodiversity Plan
- 2 An incomplete Landscape Character Assessment
- 3 A lack of information regarding floodplains and flood risk areas.

These gaps were subsequently addressed in the Development Plan as follows; a Biodiversity Plan will be prepared within the lifetime of the new Development Plan. It is an objective of the Council to further develop the Landscape Character Areas Assessment in accordance with the Draft DOEHLG Guidelines including deriving a series of objectives for each character area. Detailed information concerning floodplains will be incorporated into the Plan when the Liffey CFRAMS Study becomes available (the Dodder information has already been incorporated).



## Mapping of Environmental Sensitivities

Individual maps indicating baseline sensitivities, along with amalgam map of sensitive areas (large map).





## 2.2.4 Strategic Environmental Objectives (SEO)

The SEOs are measures against which the environmental effects of the County Development Plan (CDP) can be tested in order to help identify areas in which significant adverse impacts are likely to occur, if unmitigated. The SEOs are objectives derived from international, E.U. and National strategies, policies, directives and plans that are relevant to the South Dublin County Development Plan. The SEOs are linked to indicators and targets which facilitate monitoring of the implementation of the County Development Plan (see Section 5) and are as follows;

<b>Biodiversity 1 (B1)</b>	To avoid loss of relevant habitats, geological features, species or their sustaining resources in designated ecological sites
<b>Biodiversity 2 (B2)</b>	To avoid significant adverse impacts, including direct, cumulative and indirect impacts, to relevant habitats, geological features, species or their sustaining resources in designated ecological sites by development within or adjacent to these sites
<b>Biodiversity 3 (B3)</b>	To sustain, enhance or - where relevant - prevent the loss of ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity
<b>Human Health 1 (HH1)</b>	To protect human health from hazards or nuisances arising from traffic and incompatible landuses
<b>Soil 1 (S1)</b>	To maximise the sustainable re-use of brownfield lands and the existing built environment, rather than developing greenfield lands
<b>Soil 3 (S3)</b>	To minimise waste production and reduce the volume of waste to landfill and to operate sustainable waste management practices. (S2, an SEO with an objective to minimise losses of highly productive agricultural soils was excluded because of the absence of adequate information in the County)
<b>Water 1 (W1)</b>	To maintain and improve, where possible, the quality of rivers, lakes and surface water
<b>Water 2 (W2)</b>	To prevent pollution and contamination of ground water
<b>Water 3 (W3)</b>	To prevent development on lands which pose - or are likely to pose in the future – a significant flood risk
<b>Climate and Air 1 (C1)</b>	To minimise increases in travel related greenhouse emissions to air i.e. minimise travel demand
<b>Climate and Air 2 (C2)</b>	To reduce car dependency within the County by way of, inter alia, encouraging modal change from car to more sustainable forms of public transport and encouraging development which will not be dependent on private transport
<b>Material Assets 1 (M1)</b>	To serve new development under the CDP with appropriate waste water treatment
<b>Material Assets 2 (M2)</b>	To maintain and improve the quality of drinking water supplies
<b>Cultural Heritage 1 (CH1)</b>	To protect the archaeological heritage of South Dublin with regard to entries to the Record of Monuments and Places - including Zones of Archaeological Potential - and the context of the above within the surrounding landscape where relevant
<b>Cultural Heritage 2 (CH2)</b>	To preserve and protect the special interest and character of South Dublin's architectural heritage with regard to entries to the Record of Protected Structures, Architectural Conservation Areas, and their context within the surrounding landscape where relevant
<b>Landscape 1 (L1)</b>	To protect and avoid significant adverse impacts on the landscape, landscape features and designated scenic routes; especially with regard to areas of high amenity, the Dublin Mountain Area, and the River Liffey and River Dodder Valleys

**2.2.5 Environmental Assessment:** The policies and objectives of the Development Plan were assessed against the SEOs at a number of stages during the process. This allowed for early identification and mitigation of environmental conflicts. This resulted in amendments to existing policies, the addition of environmentally beneficial policies and the removal of policies with significant negative effects. Development Plan policies were also assessed for **secondary, cumulative, synergistic, short, medium, and long term, permanent and temporary, positive, neutral and negative** effects as required under the SEA Directive.

Assessment of each Development Plan policy is contained within Appendix 1 of the Environmental Report (September 2009), while an abridged assessment of the relevant sections of the Development Plan is contained within Section 8 of the Environmental Report. Both sections contain detailed annotations which explain the rationale behind the assessments.

The policies and objectives proposed by the elected members before the Draft Plan went on public display in September 2009 were also assessed and incorporated into the plan as adopted.

**2.2.6 Mitigation.**

A series of mitigation measures were recommended in the Environmental Report for integration into the Development Plan and the significant ones are summarised below. These have been included within the Development Plan as new policies or amendments to policies.

**Selected Mitigation Measures.**

<b>Biodiversity</b>	Strengthens Habitat Directive requirements in relation to Natura 2000 sites i.e. requires Habitat Directive Screening for all programmes and projects within the County and introduces new National Guidance requirements <b>LHA9</b>
	Requires the preparation of a County Biodiversity Plan within Development Plan time framework <b>LHA15</b>
	Protection for EU and Nationally “protected species” <b>LHA7 LHA8 LHA9 LHA15 LHA17 LHA18 LHA19 LHA20 LHA21 LHA22 LHA28 LHA29 LHA31 LHA32 SLO1 SLO7 SLO37 SLO86 Section 4.3.7.xvii</b>
	Requires that all Planning applications for medium and high density development utilise the ‘Green City Guidelines’ <b>LHA19A<sup>1</sup></b>
	Requires Asset Management Plan for tourist attractions <b>SCR52 LHA9 LHA22 LHA27 LHA29 EE26 EE27 SLO1 SLO37 SLO78 SLO31</b>
	Requires all piped infrastructure providers to assess biodiversity impact <b>Section 2.2.37 2.3.9 Policy WD3</b>
	Western North-South Road from the N7 to the N4 requires a sustainability assessment of the need for the route, and an Environmental Impact Study including alternative alignments on the Grand Canal <b>SLO33</b>
	Biodiversity Action Plan required for development adjoining the Grand Canal (pNHA), including associated habitats. <b>LHA22 SLO37 SLO31</b>

<sup>1</sup> This mitigation measure was introduced by the SEA team post Environmental Report

	<p>Landscape Design Frameworks required for lands rezoned for Tier 2 and Tier 3 employment uses Policy <b>EE13 EE14 EE15 EE19 SLO36</b></p> <p>Further proposals to rezone land for Tier 3 use require a Sustainability Assessment <b>EE13</b></p>
	<p>Wind energy developments require assessment indicating the impact of development on protected bird and mammal species. <b>Policy EC8 Section 2.5.11</b></p>
	<p>Requires the adoption of River Basin Management Plan <i>Programme of Measures</i> when finalised <b>Section 2.3.2 2.3.11 Policy WD5</b></p>
	<p>Requires development not to compromise the quality of surface water (and associated habitats and species) and groundwater. <b>WD2 WD3 WD4 WD5 WD9 LHA19 LHA20 LHA21</b></p>
<b>Waste Water</b>	<p>Development under the Plan shall be preceded by sufficient capacity in the public waste water treatment <b>WD2 WD3 WD4 Section 2.3.9</b></p>
<b>Surface Water</b>	<p>Strengthens Flood Risk Directive 2007/60/EC and introduces the National Guidelines <b>Policy WD13 WD14 WD15 SLO36 SLO7</b></p>
	<p>Expands 10 metre riparian zone where required <b>LHA20 Section 2.3.21</b></p>
<b>Soil and Contamination</b>	<p>Requires appropriate investigations to be carried out into soil and groundwater conditions prior to development work on contaminated sites <b>Policy WD4</b></p>
<b>Landscape</b>	<p>Requires Visual Impacts Assessment of development above the 120m contour with a High Amenity Areas zoning objective <b>SN40 EC3 EE26 EE27 LHA14</b></p>
	<p>Requires the further development of the Landscape Character Areas Assessment in accordance with the National Draft Guidelines including deriving a series of objectives for each character area Policy <b>LHA1</b></p>
<b>Transportation and Climatic Factors</b>	<p>Reduces the potential for traffic congestion and vehicular emissions in urban areas through "integrated place-making design" <b>SCR40 Section 1.4.6 Character Appraisal SN2 SN3 SN4 SN5 SN6 SN7 SN8 SN9 SN10</b></p>

## SECTION 3: SUBMISSIONS & OBSERVATIONS DURING PROCESS

### 3.1 Introduction

The following section details the significant issues which were raised prior to, during and after the preparation of the Draft County Development Plan and the accompanying Environmental Report and how these were incorporated into the Plan. The submissions range from the initial scoping responses on environmental issues from the Statutory Authorities (February 2009), submissions on the Draft Plan and Environmental Report (September 2009), as contained in Addendum I of the Environmental Report (17<sup>th</sup> February 2010, and submissions on the amendments to the Draft Plan and assessed environmental effects of the amendments (Addendum II of the Environmental Report June 2010).

### 3.2 SEA Scoping Consultations

The Strategic Environmental Assessment scoping issue paper was sent to the Department of the Environment, Heritage and Local Government (DOEHLG), Department of Communications, Marine and Natural Resources (DCMNR) and Environmental Protection Agency (EPA). The responses to the issues paper were taken into account during the carrying out of the Strategic Environmental Assessment. The most significant issues/points raised were:-

- 1 The possible (indirect) environmental impacts on bathing areas, beaches and coastal areas in Dublin Bay by means of environmental vectors (Liffey, Dodder and Grand Canal).
- 2 That the River Dodder and Liffey are significant salmonid fisheries.
- 3 The need for riparian zones alongside rivers and streams.
- 4 That the Appropriate Assessment procedure has a separate legislative process from the Strategic Environmental Assessment process and that this should be dealt with separately from the Environmental Report.
- 5 The specific issues raised by the National Parks and Wildlife Section of the DOEHLG relating to the integrity of Grand Canal corridor in Gollierstown, and the Gortlum-Mountseskin-Aghfarrell area of Brittas was to be taken into account within the Environmental Baseline section of the Environmental Report, and should inform the SEOs relating to biodiversity issues.

These issues and associated responses were incorporated into the [Scoping Report](#) which was issued in April 2009.

A meeting was held with the EPA in March 2009 to establish agreement on the methodology, structure and focus of the SEA.

### 3.3 Submissions and Observations on the Draft Plan and Environmental Report.

The written submissions received from the Environmental Authorities and the Non Statutory Submissions following the public display period (22<sup>nd</sup> September to 2<sup>nd</sup> December 2009) of the Draft Development Plan 2010-2016 (and accompanying Environmental Report and Appropriate Assessment Screening) and the responses are summarised below. The full [Response to Submissions Report \(Feb 2010\)](#) is available.

Submission Summary	Comment
<b>DoEHLG</b> Protect feeding areas of greylag geese that roost on the Poulaphouca Reservoir SPA	The submission resulted in amendment to include this issue in policy <b>LHA19 Flora and Fauna</b>
There appears to be no mention of species	Both E.U. and Nationally protected species are now

protected under National Law	included in policy <b>LHA19 Flora and Fauna</b>
<p><b>The Eastern Regional Fisheries Board</b> Designate lands adjacent to surface waters for protection / enhancement of biological diversity and recreational amenity</p> <p>Septic tank and Percolation areas to conform with the EPA, Code of Practice, Wastewater Treatment and Disposal Systems serving Single Houses 2009</p> <p>All road construction should refer to guideline document "Requirements for the Protection of Fisheries Habitat during Construction and Development Works at River Sites"</p>	<p>The submission resulted in the amendment of <b>Section 2.3.9</b> and <b>4.3.7.xviii Policy LHA20</b> to allow for increased riparian zones in certain circumstances</p> <p>The submission resulted in amendment to <b>Section 1.2.53</b> to include reference to the code of practice</p> <p>The submission resulted in amendment to <b>Section 2.2.37</b> Roads Objectives to include the reference</p>
<p><b>Environmental Protection Agency</b> There is no reference in the Plan to the findings of the SEA or the AA screening process</p> <p>Consideration should be given to the inclusion of a specific Policy/Objective regarding the SEA Directive</p> <p>Include a specific policy to the CFRAMS results / recommendations for the Rivers Dodder and Liffey</p> <p>Refer to the updated <i>Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2006 and 2007</i>, (EPA 2009)</p> <p>Refer to a <i>Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (p.e &lt; 10)</i>, (EPA, 2009)</p> <p>Review existing zoned lands to identify flood risk potential; specifically those identified as floodplains zoned for development in the 2004-2010 CDP. Refer to the Planning Guidelines on flooding in "<i>The Planning System and Flood Risk Management - (Environment, Heritage and Local Government – OPW, November 2009)</i>"</p> <p>Refer to the updated "<i>The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2007-2008</i>", (Office of Environment Enforcement- EPA, 2009)</p> <p>Include a Policy/Objective to manage and mitigate against invasive species/noxious weeds</p>	<p>A significantly expanded section in relation to these aspects was included in Appendix 7 of the Plan</p> <p><b>Section 0.4.4.2</b> detailed compliance with "Strategic Environmental Assessment" and the SEA Directive</p> <p>A new <b>SLO</b> was created indicating areas of flooding potential and the requirements of the Flood Risk Management Guidelines</p> <p>The relevant text was incorporated within <b>section 2.3.8.i</b> of the Plan</p> <p>The relevant sections of the Draft Plan were updated</p> <p>A new <b>SLO</b> was created indicating areas of flooding potential and the requirements of the Flood Risk Management Guidelines</p> <p>The submission resulted in amendment to <b>Section 2.3.5</b> to include reference to the report</p> <p>The submission resulted in amendment to Policy <b>LHA19</b> to include a programme to monitor and restrict the spread of invasive species</p>

<p>Amending Policy LHA9 to more clearly state the requirement for Appropriate Assessment screening</p> <p>Refer to the DOEHLG circular letter – SEA 1/08 &amp; NPWS 1/08 (dated 15/02/08) and to DOEHLG <i>Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities</i> was produced in December 2009</p> <p>Amend Policy <b>LHA15</b> to ensure the preparation of the Biodiversity Plan occurs within the lifetime of the Plan</p>	<p>The submission resulted in amendment to strengthen Policy <b>LHA9</b></p> <p>The submission resulted in amendment to section <b>4.3.7.vii.</b> to include the Guidance document</p> <p>The submission resulted in amendment to Policy <b>LHA15</b> to include this objective</p>
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### SEA Specific Issues Raised in Non-Statutory Submissions

<p><b>Submission numbers 105 137 138 144</b></p> <p>Do not believe that the SEA conducted meets with the statutory requirements and will need to be substantially revisited before the process can be successfully concluded legally</p> <p><b>Submission Numbers 105 137 138</b></p> <p>Absence of a Biodiversity Action Plan and other Biodiversity Studies and flood assessment are major deficiency- County Plan cannot be considered in the absence of these and other matters</p>	<p>The SEA Environmental Report complies with the requirements of the SEA Directive and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004)</p> <p>Section 3.3.8 of the Environmental Report notes the absence of a Biodiversity or Habitat Plan for the County constrained assessment at local level. The Biodiversity Plan is now a requirement of the Draft Plan (LHA15 Section 4.3.7.xiii). A limited Flood Assessment was undertaken as part of the SEA and Development Plan process based on available information</p>
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### 3.4 Submissions and Observations on the Proposed Amendments and SEA Addendum II to the Environmental Report.

The environmental assessments of the proposed amendments to the Draft Development Plan were on public display from 3<sup>rd</sup> June – 1<sup>st</sup> July 2010. This document is available [here](#). The following table summarises the submissions and observations on the proposed amendments to the Draft Development Plan and the SEA assessment of these amendments. The full response to these submissions is available [here](#).

Submission	Response.
<p><b>Bohernabreena-Glenasmole-Ballinascorney Residents Planning Group.</b></p> <p><b>PA018-</b> Regarding cluster development in Brittas and Bohernabreena.</p> <p><b>PA019</b> Rural amenity and agriculture:- Proposed that the Policy H30(A) be relocated to a new section 1.2.52.i (a) and be renamed as Policy H29 (A): Rural Housing Policies and Local Need Criteria.</p> <p><b>PA020</b> Dublin Mountain Zone:- Policy H31(A)</p>	<p>The amendments as proposed significantly weaken the constraints on housing in rural and upland areas, allowing for urban generated housing to be considered, and cumulatively and individually will result in damage to sensitive environments. Further weakening restrictions on development in these areas will increase the chances of irreparable damage to the landscape, habitats, biodiversity,</p>

<p><b>PA023</b> Policy H33(A): Rural Communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas.</p> <p><b>PA146-</b> Policy LHA13; Delete all references to the Dublin Mountain Area, Mountains Area or Development Plan Zoning Objective H from the Policy.</p>	<p>surface and ground waters, as well as the Bohernabreena SAC and the Dodder, Camac and Owendoher, all of which feed into Dublin Bay SAC.</p> <p><b>Recommendation:-</b> That the recommendations are not adopted, and that amendments <b>PA018, PA019, PA020, and PA023</b> be omitted in order to prevent significant negative residual impacts.</p>
<p><b>South Dublin Conservation Society</b></p> <p><b>PA070</b> Long term roads objectives- Object to M50 Overbridge from Red Cow to Ballymount (Public Transport only)</p> <p><b>PA200</b> Commons Little, Nursing Home-</p>	<p><b>Recommendation:</b> That the indicative layout on Map 2 be amended</p> <p><b>Recommendation.</b> It is considered that the proposed amendment <b>PA200</b> be omitted</p>
<p><b>Liffey Valley Park Alliance</b></p> <p>Queries use of national plans within the SEA process, given the lack of conformance of the national plans to SEA.</p> <p>Comments on the listing of herb-flora species and the location of such in the Liffey Valley</p>	<p>The Draft Plan and SEA must be informed by national and regional plans.</p> <p>The SEA is not meant to be utilised as a detailed biodiversity database.</p>
<p><b>Finnstown Action Group (FIG)</b></p> <p>Claim that there are major gaps in the SEA:- lack of Biodiversity Plan, incomplete Landscape Character Assessment lack of information regarding floodplains and flood risk areas.</p> <p><b>PA070:-</b> Objects to the proposed route of the 'Outer Western Road'</p> <p><b>PA080</b> Waste management strategy:- <b>PA078</b> Environmental Services:- <b>PA079-/083/087/089/090/237:-</b> Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration.</p>	<p>These information gaps are acknowledged in the Environmental Report and were inserted into the Draft Development Plan as policies to be completed urgently as a result.</p> <p>As a result of the SEA process an SLO requiring a sustainability assessment of the need for the route and an EIS to examine alternative alignments with particular emphasis on the Grand Canal was included within the Draft Plan.</p> <p>The SEA process has an obligation with respect to national and regional plans and policies. The Waste Management Plan for the Greater Dublin Area, which is a regional plan, includes incineration as part of the waste management policy and envisages a regional incinerator located in Poolbeg.</p>
<p><b>Environmental Protection Agency</b></p> <p>Comment in relation to SEA and obligation to consider relevant criteria in Schedule 2A of the Planning and Development (Strategic Environmental Assessment) Regulations 2004</p> <p>Comment in relation to a number of Proposed Amendments described as having potential for negative environmental effects prior to mitigation measures being established.</p>	<p>This is acknowledged. All amendments were screened for likely significant environmental effects, including cumulative effects.</p> <p><b>Recommendation:</b> It is recommended that these proposed amendments/rezonings <b>PA125 PA163 PA227 PA228</b> be omitted.</p>
<p><b>National Transport Authority</b></p> <p><b>PA002</b> Core Strategy: Comments relating to the legacy of zoned residential land in peripheral locations on the western and southern fringes of the County which has the potential to undermine</p>	<p><b>Recommendation:</b> It is recommended that the proposed rezonings <b>PA125 PA163 PA227 and PA228</b> be omitted in order to prevent significant negative residual impacts.</p>



the Draft Plan's emphasis on consolidation.	
<p><b>Department of the Environment</b>  <b>PA002</b> Core strategy:- Needs to demonstrate consistency with the RPGGDA.</p>	Agreed.
<p><b>An Taisce</b>  SEA Issues. The submission states that there is little mention of the Metro West plans across the Liffey Valley.</p> <p>The submission questions the depth and quality of the environmental report.</p> <p>Species listed under Annex II and Annex IV are strictly protected wherever they occur. Given the fact that species threat action plans have been required for Annex IV species such as otters, more specific protection should be specified. The plan and associated environmental report is weak in this regard.</p> <p>As part of an SEA there should be a list of all areas in the county that contain Red Book species and Floral Protection Orders  It is not clear in the SEA how the Liffey CFRAMS is going to be addressed.</p> <p>Do not believe that the Liffey's status as a salmonid river has been considered adequately in the Plan or in the SEA.</p> <p><b>PA107</b> Offices over 1,000m2 in EP2 areas:- There is sufficient properly zoned land in the county to allow for offices in suitable areas without allowing for offices in EP2 areas.</p> <p><b>PA124</b> Village expansion: Welcome any attempt to limit ribbon development and one-off housing.</p> <p><b>PA163</b> Hazelhatch Marina: The creation of a marina at Hazelhatch could be very detrimental to the area.</p> <p><b>PA228</b> N7 EP2 rezoning: Strongly disagree with plans to zone lands along the northern side of the N7 Naas Road.</p>	<p>This will be noted in the Environmental Report, as amended upon subsequent adoption of the Draft Development Plan.</p> <p>None of the submissions from the statutory bodies, specifically the EPA or DoEHLG, noted any irregularities regarding the SEA.  The Environmental Report and Draft Plan note the requirements of the Habitats Directive as well as Irish Law. The protection of biodiversity has informed and shaped the Development Plan process, and resulted in many policies specifically tailored towards the protection and enhancement of protected species.</p> <p>The SEA is not meant to be utilised as a detailed biodiversity database.</p> <p>The Draft Plan (section 2.3.25) specifically notes that any recommendations arising from CFRAMS will be incorporated into the development management process.  The amendment to section 2.3.9 of the Draft Plan was informed by the submission to the Draft Development Plan by the ERBD and recommended for inclusion through the SEA process.</p> <p><b>Recommendation:</b> It is recommended that the proposed amendment <b>PA107</b> incorporate a requirement for such development to be located within 400m walk of high quality public transport in order to prevent significant negative residual impacts.</p> <p><b>Recommendation:</b> It is recommended that the proposed amendment <b>PA124</b> be omitted.</p> <p><b>Recommendation:</b> It is recommended that the proposed amendment <b>PA163</b> be omitted</p> <p><b>Recommendation:</b> It is recommended that the proposed rezoning <b>PA228</b> be omitted</p>

Submissions on the proposed amendments and Addendum II of the Environmental Report (noted above) were assessed for environmental consequences and provided to the elected members in late August 2010 along with the Managers Report on submissions received. Upon adoption of the Draft Plan in September 2010, all adopted amendments were incorporated into an updated final Environmental Report.

## SECTION 4 ALTERNATIVES AND THE PLAN

### 4.1 Alternatives

An evaluation of the likely environmental consequences of a range of alternative strategies for accommodating future development in the South Dublin area was part of the SEA process. The scenarios were derived taking into account higher level strategic plans as well as the geographical scope of the area. The Regional Planning Guidelines for the Greater Dublin Area 2004-2016 (RPG-GDA) provide an overall strategic settlement context for the Development Plans of each local authority in the GDA. The alternative scenarios considered were:-

**Option 1: Environmental/Preservation Approach:** This Scenario prioritises the protection of South Dublin's natural environment together with the amenity and character of existing residential areas. The entire County would be subject to policies providing for the conservation and protection of the existing built and rural environment. Only limited brown-field development would be allowed in the Town Centres, within District Centres and urban and rural villages.

**Option 2: Sustainable/Selective Concentrations Approach:** In this scenario the components of sustainable development – economic development, social well-being, environmental protection and enhancement, and resource conservation are integrated in the Plan. Allowance is made in this scenario for some trade off between development and environmental protection with mitigation measures ameliorating any significant negative environmental impacts.

**Option 3: Weak Planning/Market Led Approach:** This Scenario would be characterised by a weak planning approach to development within the County with a flexible overall development strategy and an emphasis on market-led growth, maximising growth in the County.

**Option 4: Combination of Reactionary Planning and Market-led Approach:** This Scenario would be characterised by a reactionary and negative planning approach to development within the existing built up areas in the County but with a flexible market-led development approach along the edge of the built up areas.

The do-nothing scenario was excluded as the Council has a statutory obligation to review and prepare a Development Plan every 6 years. The Baseline section dealt with the evolution of the environment in the absence of a Development Plan being implemented.

As outlined in the DEHLG SEA Guidelines, certain strategic issues in County Development Plans have already been determined at national or regional level. Development Plans must have regard to these policies and guidelines, and demonstrate consistency to same. This limits the strategic alternatives available.

### 4.2 Assessment of Alternatives

#### Evaluation using the SEOs

The scenarios were evaluated using the SEOs and the Baseline information. The full description of the impacts of implementing the differing development alternatives on the receiving environment is contained within Section 7 of the Environmental Report. The summary evaluation table assessing the alternatives against the Strategic Environmental Assessment Objectives (SEOs) is set out below;

	Likely to <b>Improve</b> status of SEOs	Probable <b>Conflict</b> with status of SEOs unlikely to be mitigated	Potential <b>Conflict</b> with status of SEOs- likely to be mitigated	Uncertain Interaction with status of SEOs	Neutral Interaction with status of SEOs	No Likely interaction with status of SEOs
<b>Alternative Scenario 1</b> Environmental/ Preservation	B1 B2 B3 W1 W2 W3 CH1 M1 M2 L1 HH1	HH1 S1 C2 C1	B1 B2 B3 W1 W2 W3 CH1 M1 M2 L1 HH1 (Blue indicates indirect impact)	CH2	S3	
<b>Alternative Scenario 2</b> Sustainable /Selective Concentrations	B1 B2 HH1 S1 S3 W1 W2 C1 C2 M1 M2 L1		W3 CH1		CH2	
<b>Alternative Scenario 3</b> Weak Planning/Market Led Approach		B2 B3 HH1 S1 W1 W2 W3 C1 C2 M1 M2 CH1 CH2 L1		B1 S3		
<b>Alternative Scenario 4</b> Reactionary Planning/Market Led Approach		B1 B2 B3 HH1 S1 S3 W1 W2 W3 C1 C2 M1 M2 CH1 CH2 L1				

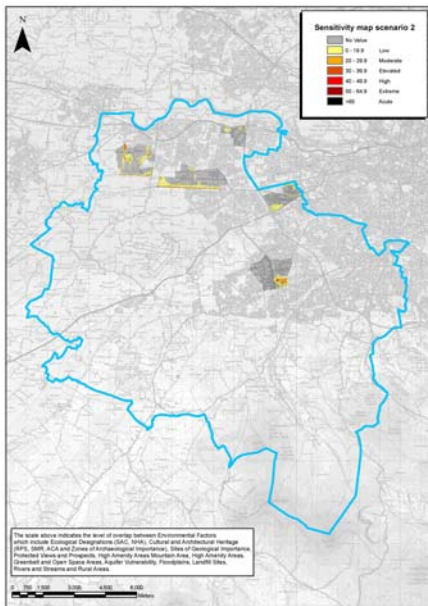
### Synopsis of SEOs.

<b>B1</b>	Avoid loss of habitats etc in designated ecological sites
<b>B2</b>	Avoid impacts by development within or beside these sites
<b>B3</b>	Prevent loss of ecological networks
<b>HH1</b>	Protect human health - traffic/ incompatible landuses
<b>S1</b>	Re-use of brownfield lands
<b>S3</b>	Operate sustainable waste management practices
<b>W1</b>	Maintain and improve river, lake and surface water quality
<b>W2</b>	Prevent pollution of ground water
<b>W3</b>	To prevent floodplain development
<b>C1</b>	Reduce greenhouse emissions from travel
<b>C2</b>	To reduce car dependency.
<b>M1</b>	Appropriate waste water treatment for new development
<b>M2</b>	Quality of drinking water
<b>CH1</b>	Protect archaeological heritage
<b>CH2</b>	Protect architectural heritage
<b>L1</b>	To protect the landscape

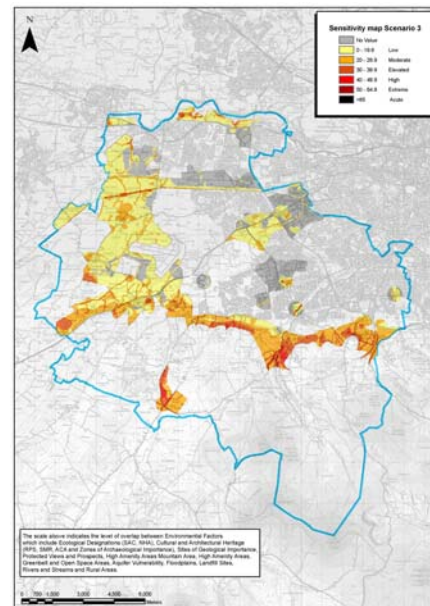
Scenario 1, (the environmental / preservation) does give rise to a high level of direct, short-term beneficial environmental effects (although also results in significant negative direct and indirect impacts). In the medium to long-term Scenario 2 is more likely to bring about better environmental outcomes because of its ability to bring about both controlled growth and the necessary growth to capitalise important environmental mitigation measures. Scenario 3 and 4, which include the accommodation of major development on Greenfield land at the edge of the present conurbation, would result in a range of significant environmental conflicts which cannot be fully mitigated.

## Evaluation using Sensitivity Mapping

Alternative Scenarios 2 and 3 were also assessed using the environmental sensitivities overlay mapping (derived in the Baseline Section). The extent of the vulnerability areas which were likely to be impacted upon by the areas of Scenarios 2 and 3 which were most likely to come under urban pressure were mapped (see below) and calculated using GIS software. The measurements indicated that Scenario 2 would be likely to result in significantly less adverse environmental impacts and on a significantly lesser land area.



Sensitivity Map Scenario 2



Sensitivity Map Scenario 3

### 4.3 Reasons for choosing the preferred alternative

The evaluations indicate that Scenario 2 (Sustainable/Selective Concentrations) would result in the best environmental outcome in the South Dublin County Council area. While there are considerable benefits to Scenario 1, the over strict strategy in relation to preservation and conservation would push development to adjoining counties and thus be likely to result in indirect environmental impacts across a range of receptors.

Scenario 2 would allow for consolidation of development into key areas (land adjoining Tallaght, Clondalkin and Liffey Valley Town Centres, SDZ areas), including significant amounts of brownfield redevelopment along high quality public transport corridors. However, in order to facilitate the development of these lands, a certain amount of Greenfield development will have to occur in order to allow for the relocation of space intensive uses with low employees numbers. This strategy, i.e. Scenario 2 (Sustainable/Selective Concentrations), with some elements of Scenario 3 (Weak Planning/Market Led Approach) represents a pragmatic recognition of the need to continue to accommodate and control growth in the South Dublin County Council area. Mitigation of impacts was included in the policies of the Development Plan as a result of assessment by the Environmental Report.

### 4.4 Effects of Amendments on Preferred Alternative

The amendments to the Draft Plan by the elected members prior to public display in September 2009 did not result in significant changes to the preferred alternative in terms of land use. The amendments to the Draft Plan by the elected members in May and September 2010 did however result in changes to the policies and land uses proposed within the Development Plan. It was considered that these some of these changes would result in significant deviation from the preferred alternative.

On the positive side, a new zoning was introduced; 'I' To protect and enhance the outstanding character and amenity of the Liffey Valley and to preserve its strategic importance as a green break between urban settlement areas". The zoning will restrict the land uses permitted and open for consideration in the Liffey Valley, thereby resulting in greater protection for this sensitive resource.

A series of amendments have been incorporated into the Plan which are likely to result in a range of significant negative environmental impacts. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, there are likely to be significant residual negative impacts. The amendments that are likely to result in **significant residual negative impacts** are as follows;

<b>Policy / Objective</b>	<b>Comment</b>	<b>Likely Significant Negative Residual Impacts</b>
<p>The easing of some Housing restrictions in Bohernabreena /Glenasmole/ Ballinascorney/ Brittas</p> <p><b>1.2.52.i Policy H29</b>  <b>1.2.52.ii Policy H29(a)</b>  <b>1.2.52.iii Policy H31(a)</b>  <b>1.2.52.v(a) Policy H33A</b></p>	<p>The amendments as proposed significantly weaken the constraints on housing in these sensitive upland areas, allowing for urban generated housing to be considered, and cumulatively and individually will result in damage to sensitive environments.</p>	<p>Will increase the chances of irreparable damage to the landscape, habitats, biodiversity, surface and ground waters, as well as the Bohernabreena SAC and the Dodder, Camac and Owendoher, all of which feed into Dublin Bay which supports a suite of SACs and SPAs.</p>
<p><b>3.2.9.x EE11(A):</b> Offices over 1000m2 in EP2 zone subject to be "Open for Consideration" category rather than the "Not Permitted" subject to "sufficient public transport provision" <b>3.2.9.x</b></p>	<p>"Sufficient public transport provision" is not a rigorous mitigation measure. The recommended mitigation "within 400 metres of a high quality public transport system" was not accepted.</p>	<p>Negative environmental impacts for car dependency, emissions and sustainable development of Brownfield sites</p>
<p><b>3.3.24.vii Policy TDL 28(B):</b> Facilitate the provision of suitable sites in the environs of rural villages.</p>	<p>Facilitates population dispersal outside rural villages on land zoned for the development of agriculture</p>	<p>Negative impacts to water-bodies, flooding, heritage, landscape, biodiversity</p>
<p>Facilitate the development of a Residential Marina Village at Hazelhatch</p>		<p>Negative environmental impacts to habitats, biodiversity, landscape and heritage</p>
<p>Rezone land at Tootenhill from agriculture to residential use</p>	<p>This land is at the western edge of Rathcoole bounded by of a tributary of the Griffeen River that has been identified as potential flood hazard.</p>	<p>Would negatively impact on the flood plain of a tributary of the Griffeen River, associated biodiversity corridor, landscape and increase car travel and car dependency</p>
<p>Rezone lands along the northern side of the N7 Naas Road between Baldonnell</p>	<p>The rezoning of large additional areas of agricultural land for industrial purposes</p>	<p>This would have direct negative consequences for Biodiversity (river and hedge</p>

Business Park and Casement Aerodrome	would undermine the development strategy outlined in the Environmental Report, and would facilitate the sprawl of industrial development in numerous locations in the County, rather than in certain appropriate areas.	systems)/Transport (no high quality public transport nearby)/Heritage (impacts on RMP021-021 & 021-020/Landscape (Visual Sprawl in a rural area)/River Flooding (Camac) in the zoned area, as well as indirectly having negative effects on the sustainable reuse of brownfield sites.
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The result of these amendments being incorporated into the Development Plan have decreased the extent of the Plan following the preferred Scenario 2 (Sustainable/Selective Concentrations), and increased elements of Scenario 3 (Weak Planning/Market Led Approach).

**SECTION 5 SUMMARY OF INFLUENCE OF THE SEA PROCEDURE ON THE PLAN**

Overall, the influence of the SEA process on the Development Plan has been positive. The early identification of the important environmental issues within the County, and refinement of those issues during the scoping process and production of the Environmental Report allowed for adoption of meaningful environmental protection policies into the Development Plan. Continual assessment of policies and motions, as well as submissions and observations from interested parties also resulted in modification of policies for the benefit of the environment of South Dublin. A small number of amendments and rezonings to the Development Plan are likely to lead to residual negative impacts.

## SECTION 6 MONITORING

### 6.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This SEA Statement identifies the proposals for monitoring the Plan which were adopted alongside the Plan.

Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action. In addition to this, monitoring can also play an important role in assessing whether the Plan is achieving its environmental objectives and targets - measures which the Plan can help work towards - whether these need to be re-examined and whether the proposed mitigation measures are being implemented.

### 6.2 Indicators and Targets

Monitoring is based around the indicators which were chosen earlier in the process. These indicators allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives used in the evaluation. Focus has been given to indicators which are relevant to the likely significant environmental effects of implementing the Plan. Existing and new monitoring arrangements will be used in order to monitor the selected indicators. The Council has introduced a series of measures (some GIS based) to allow monitoring through the Planning Management system.

Each indicator to be monitored is accompanied by targets which are derived from the relevant legislation and the advice of the EPA, see Section 10 of the Environmental Report. The table below summarises the indicators and information sources which have been selected with regard to the monitoring of the Plan.

SEO	Indicators	Information Sources
B1:	Percentage of relevant habitats and designated ecological sites lost	SDCC
B2:	No. of significant adverse impacts to relevant habitats, geological features, species or their sustaining resources in designated ecological sites	SDCC
B3:	Area of Biodiversity Network (County's primary ecological corridors) which has been lost without mitigation	SDCC
HH1	Indicator HH1: No of occasions that PM10 limits have been exceeded in at Air Monitoring stations  Indicator HH2: Percentage of population that are exposed to unacceptable <sup>2</sup> levels of traffic noise	EPA  Dublin Agglomeration Local Councils
S1:	S1i: Area of brownfield land redeveloped  S1ii: Area of greenfield land developed  S1iii: Number of contaminated sites identified and remediated	SDCC  SDCC  SDCC
S3:	S3: Volume of waste recycled and volume of waste sent to landfill	SDCC
W1	Indicator W1i: Biotic Quality Rating (Q Value) and risk assessment	EPA, Eastern

<sup>2</sup> As defined by the Dublin Agglomeration Noise Action Plan 2008 - 2013



	Indicator W1ii: EPA Trophic Status of Lakes	River Basin District Reports
W2	Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	As above
W3	Number of developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk	SDCC
C1	C1i: Percentage of population within the County traveling to work or school by public transport or non-mechanical means	Census information
	C1ii: Average distance traveled to work or school by the population of the County	As above
C2:	Extent of developments built within areas served by high quality public transport	SDCC
M1:	Number of new developments granted permission which cannot be adequately served by a public waste water treatment	SDCC
M2	Drinking water quality standards, (Microbiological, Chemical and Indicator parameters)	EPA
CH1	Number of unauthorised developments occurring which result in full or partial loss to entries to the Record of Monuments and Places - including Zones of Archaeological Potential	SDCC
CH2	CH2i: Number of unauthorised developments occurring which result in physical loss or loss entries to the Record of Protected Structures	SDCC
	CH2ii: Number of additions to the Record of Protected Structures and the number of additional ACAs	SDCC
L1:	L1i: Number of developments permitted in the Mountain, High Amenity, Liffey Valley and Rural zones	SDCC
	L1ii: Percentage of developments permitted in the Mountain, High Amenity, Liffey Valley and Rural zones that have carried out landscaping proposals as required by condition	SDCC
		SDCC

### 6.3 Reporting

A monitoring report, evaluating the effects of implementing the County Development Plan will be prepared at the same time as the Manager's Report to the Elected Members on the progress achieved in securing County Development Plan objectives. Section 15 of the Planning and Development Act states that this report is required within two years of the making of the Plan. It is the intention of the Council that an SEA Monitoring Report will be prepared at two yearly intervals.

### 6.4 Responsibility

South Dublin County Council are responsible for gathering the monitored data, the preparation of the interim report associated with the Manager's two year implementation report and the implementation of corrective actions, where necessary.