

Environmental Report: Addendum I

1st period of public display of the Draft Sligo and Environs Development Plan 2010-2016 and SEA Environmental Report:

Response to submissions on the SEA Environmental Report

For:

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&

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1 Introduction

This document responds to relevant submissions which were made during the 1st period of public display of the Draft Sligo and Environs Development Plan 2010-2016 and Strategic Environmental Assessment (SEA) Environmental Report. Only submissions on the SEA Environmental Report are responded to. The Councils have been informed of the environmental consequences of other relevant submissions.

It is noted that changes are not made to the original Environmental Report; this Addendum forms part of the documentation of the ongoing Strategic Environmental Assessment and plan-making process. It supplements and should be read in conjunction with the original Environmental Report which includes information on environmental sensitivities within and adjacent to the Plan area as evaluating the likely significant environmental effects of implementing the Draft Plan.

The findings of this Addendum will be used to update the Environmental Report on adoption of the Draft Plan. The updated Environmental Report will be amended to take account of the Elected Members' decisions with regard to the Manager's Recommendations and will be made available to the public alongside the Sligo and Environs Development Plan as adopted.

Proposed amendments to the Draft Plan will be evaluated for their likely significant environmental consequences in a second Addendum (Addendum II) to the SEA Environmental Report which will be placed on public display alongside the proposed amendments.

2 Responses to Relevant Submissions and Updates to the Environmental Report

2.1 Environmental Protection Agency (EPA) Submission

Note that the *italicised text* summarises the relevant parts of the EPA's submission.

2.1.1 Key Recommendations

- *Include a Policy to protect bathing waters at coast and freshwater.*
- *Include a Policy to reflect the requirements of The Provision and Quality of Drinking Water (EPA, 2007).*
- *Include a Policy supporting implementation of the principles of integrated coastal zone management.*
- *Include a specific Policy promoting the protection of wetland habitats.*
- *Include a Policy supporting the implementation of a Groundwater Protection Scheme for Sligo once completed.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include certain topics above. Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment.

Updating the Environmental Report:

None at this stage.

2.1.2 Sustainable Policies and Objectives and Sustainable Development

- *Where relevant the term "sustainable" be included within the wording of specific relevant Plan Policies /Objectives.*

Response:

Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment.

Updating the Environmental Report:

None at this stage.

2.1.3 Water Framework Directive

- *Make provision for incorporation of objectives of Western River Basin District-River Basin Management plans (RBMP).*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.4 Groundwater Protection

- *Include a measure for the protection of groundwater resources and associated habitats and species as appropriate within the Plan area.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.5 Drinking Water

- *The implementation of the relevant recommendations set out in The Provision and Quality of Drinking Water in Ireland A Report for the Years 2006-2007 should be included as a water supply policy.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.6 Water Conservation

- *Point about how the current water conservation programme should contain/be implemented.*

Response:

The environmental effects of implementing changed/additional provisions of the Draft Plan relating water conservation will be identified and evaluated.

Updating the Environmental Report:

None at this stage.

2.1.7 Zoning and Water Supply

- *A water supply policy should mention that zoning for development will be linked to the availability of adequate safe and secure drinking water supply and treatment.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.8 Bathing Water

- *Include a specific Policy to ensure that no development shall have an impact on Seawater Bathing areas in the plan area.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.9 Waste Water Treatment

- *Include a specific Policy regarding "the provision and maintenance of adequate and appropriate wastewater treatment infrastructure to service lands within the Plan area.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.10 Flood Prevention

- *Include a Policy to provide for appropriate flood risk assessments to be undertaken, where development(s) and zoning are being proposed in areas which are liable or likely to be at risk in the future from flooding.*
- *Give consideration to a stronger commitment regarding the appropriate zoning of lands and restriction of use should apply in areas liable to flooding to avoid increased risk of flooding of the lands either within or adjoining the zoned areas.*
- *Give consideration to the inclusion of a specific policy supporting the implementation of the principles of coastal zone management.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.11 Inland Waters

- *Policy P-NH-17 Inland waters policies should be amended to 'Protect and enhance biodiversity richness by protecting rivers and stream corridors and valleys by reserving land along their banks for ecological corridors, maintaining them free from inappropriate development, and discouraging culverting or realignment'.*

Response:

Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment.

Updating the Environmental Report:

None at this stage.

2.1.12 Buffer Zones

- *Give consideration to the application of appropriate buffer zones.*

Response:

Buffer zones are already applied to certain features and areas within the Draft Plan. The provisions of the Draft Plan - including these buffer zones and the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.13 Wetlands

- *Include a policy supporting the production and implementation of the biodiversity action plan.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.14 Appropriate Assessment

- *A determination for the requirement for an appropriate assessment should be recorded and made available to the public.*

Response:

The requirement for appropriate assessment is provided under the EU Habitats Directive (Directive 1992/43/EEC). Although the findings of appropriate assessments or appropriate assessment screening exercises may be included within or appended to an SEA Environmental Report and although these findings may overlap with those of an SEA, the requirement for and process of appropriate assessment are separate to those of SEA which is required under the separate Directive on SEA (Directive 2001/42/EC). An Appropriate Assessment Screening exercise will be undertaken in order to determine whether or not the Draft Plan needs to undergo Appropriate Assessment.

Updating the Environmental Report:

None.

2.1.15 EU Protected Habitats and Species in Ireland

- *Consideration should be given to the inclusion of specific policies/objectives to ensure that Sligo County Council and Sligo Borough Council in fulfilling its responsibilities, in the supply of services and in zoning of lands and authorisation of development, the threatened habitats and species identified in the National Parks and Wildlife "The Status of EU Protected Habitats and Species in Ireland", (NPWS, Department of the Environment, Heritage and Local Government, 2008).*

Response:

The integration of commitments into the RPGs relating to the National Parks and Wildlife Service Report *The Status of EU Protected Habitats and Species in Ireland* (NPWS, Department of the Environment, Heritage and Local Government, 2008) should be done with regard to legislative requirements.

Updating the Environmental Report:

None.

2.1.16 Fisheries

- *Include Policies for: the “protection of fisheries”; taking into account any Guidelines from the Fisheries Boards in relation to conservation of fisheries; and, for the protection of fish, freshwater pearl mussel and white clawed crayfish populations.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.17 Shellfish Growing Areas

- *Provisions should be made by way of a specific Plan Policy, which requires an assessment to be undertaken of the likely impact on sites being considered to be designated as Shellfish Growing Areas/ Shellfish Waters.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.18 Invasive Species

- *Include a policy which will proactively support, specific measures to control the spread of “zebra mussel” within the lake network in the country*
- *Policy P-NH-14 should make reference to relevant invasive species as well as Japanese Knotweed.*

Response:

The environmental effects of implementing changed/additional provisions of the Draft Plan relating invasive species will be identified and evaluated.

Updating the Environmental Report:

None at this stage.

2.1.19 Non-Designated Habitats and Species

- *Give consideration to the inclusion of a Policy recognising and increasing the awareness and protection of "urban biodiversity".*

Response:

The environmental effects of implementing changed/additional provisions of the Draft Plan relating to urban biodiversity will be identified and evaluated.

Updating the Environmental Report:

None at this stage.

2.1.20 Plan Policies

- *Tourism Policies: Consider the inclusion of a Policy supporting and, promoting the sustainable development of tourism, in particular taking account of the need for protection of environmental resources within and adjoining the Plan area.*
- *Energy Policies: Consider the inclusion of a policy supporting and promoting the appropriate and sustainable development of renewable energy resources.*
- *Energy Policies: Consideration should be given to the requirement for "Appropriate Assessment" under the Habitats Directive" with respect to Energy Objectives P-EN-1 and P-EN-2.*
- *Telecommunications Policies: In the context of the sensitivity of the landscape and habitats within the Plan area there consideration should be given to the inclusion of a specific Policy with respect to telecommunications and electricity related infrastructure with a view to minimising the potential for impact on the sensitive landscapes, habitats and species within and adjoining in the Plan area.*

Response:

- Tourism Policies: Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment.
- Energy Policies: Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment.
- Energy Policies: An Appropriate Assessment Screening exercise will be undertaken in order to determine whether or not the Draft Plan needs to undergo Appropriate Assessment.
- Telecommunications Policies: Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment.

Updating the Environmental Report:

None at this stage.

2.1.21 Landscape

- *Appropriate density and height restrictions should apply to development proposals to ensure that the landscape characteristics of the Plan area and the adjoining lands are not adversely impacted.*
- *Regarding the requirement for 'Visual Impact Assessment' the use of standard assessment methodology and guidance should be considered for all development.*
- *The plan should provide for promotion of linkages.*
- *The Plan should provide for enhancement of existing views and prospects.*

Response:

The provisions of the Draft Plan for the protection of the landscape and landscape features - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.22 Quality of Life

- *Consideration should be given, as appropriate, to the inclusion of specific relevant policies for "Quality of Life"*

Response:

The environmental effects of implementing changed/additional provisions of the Draft Plan relating to quality of life issues will be identified and evaluated. The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.23 Transportation

- *The Department of Transport 2020 Vision –Sustainable Travel and Transport Public Consultation Document (Feb 2008) should be reviewed in the context of possible initiatives which could be included as policies within the Plan.*

Response:

The environmental effects of implementing changed/additional provisions of the Draft Plan relating to transportation will be identified and evaluated. The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.24 Air and Climatic Factors

- *The potential for including a specific “Environmental Objective” and associated relevant “Indicator” and “Target” with respect to “noise” and possibly also “vibration”, as appropriate. Reference should be made to the Noise Directive and associated national regulations as well as the specific “measures”/ “actions” set out in or due to be set out in a proposed “ Noise Action Plan for County Sligo”;*
- *Consideration should be given to the inclusion of a Policy in relation to the preparation and implementation of “An Energy Conservation Strategy” and associated awareness campaign. Specific timescales should be assigned to the preparation for such a strategy;*
- *Consideration should be given to the inclusion of specific Policies and associated provisions for the development and promotion of appropriate climate change adaptation and mitigation measures that can be implemented through the Plan;*
- *Consideration should be given to the inclusion of a specific Policy which links existing relevant Policies in the Plan to take into account Climate Change and how it might impact on the implementation of the Plan. In this regard you are referred to the potential impact of climate change on “ increased risk of flooding ”;*

Response:

- The impact of implementing the Draft Plan on air quality and noise will be determined by the impacts which the Plan has upon the traffic levels which relate to SEO M2 as well as the impacts which the Plan has on human health which relate to SEO HH1. Further detail will be provided on noise.
- The environmental effects of implementing changed/additional provisions of the Draft Plan relating to energy conservation will be identified and evaluated;
- The environmental effects of implementing changed/additional provisions of the Draft Plan relating to climate change will be identified and evaluated. The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic;
- SEO W5 (To prevent development on lands which pose - or are likely to pose in the future - a significant flood risk) is used in order to evaluate Plan provisions;

Updating the Environmental Report:

Add Section 4.6.3 Noise:

Noise is unwanted sound. It can seriously harm human health and interfere with daily activities at school, at work, at home and during leisure time. Traffic noise alone is harming today the health of almost one third of Europeans¹.

The main health risks of noise identified by the WHO include: pain and hearing fatigue; hearing impairment; annoyance; interferences with social behaviour; interference with speech communication; sleep disturbance and all its consequences; and performance at work and school.

The Noise Directive - Directive 2002/49/EC relating to the assessment and management of environmental noise - is part of an EU strategy setting out to reduce the number of people affected by noise in the longer term and to provide a framework for developing existing Community policy on noise reduction from source.

The Directive requires competent authorities in Member States to:

¹ World Health Organization Regional Office for Europe (2003) *Technical meeting on exposure-response relationships of noise on health 19-21 September 2002* Bonn, Germany Bonn: WHO

- Draw up *strategic noise maps* for major roads, railways, airports and agglomerations, using harmonised noise indicators² and use these maps to assess the number of people which may be impacted upon as a result of excessive noise levels;
- Draw up action plans to reduce noise where necessary and maintain environmental noise quality where it is good; and,
- Inform and consult the public about noise exposure, its effects, and the measures considered to address noise.

The Directive does not set any limit value, nor does it prescribe the measures to be used in the action plans, which remain at the discretion of the competent authorities.

2.1.25 Renewable Energy

- *Consideration should be given to the inclusion of a specific Plan Policy /Objective requiring a specific percentage of electricity usage in new developments to be derived from renewable energy resources.*

Response:

The environmental effects of implementing changed/additional provisions of the Draft Plan relating to electricity usage in developments will be identified and evaluated.

Updating the Environmental Report:

None at this stage.

2.1.26 National Hazardous Waste Management Plan

- *A policy should be included Waste management policies P-WM, which makes reference to the Environmental Protection Agency's, National Hazardous Waste Management Plan –2008-2012, which was recently published*

Response:

The environmental effects of implementing changed/additional provisions of the Draft Plan relating to the National Hazardous Waste Management Plan in developments will be identified and evaluated.

Updating the Environmental Report:

None at this stage.

² [L_{den} (day-evening-night equivalent level) and L_{night} (night equivalent level)]

2.1.27 Brownfield Development

- *Include a provision to address the requirement for an assessment of potential for contaminated materials, soil, etc. to be unearthed during demolition, development works e.g. redevelopment of former petrol stations, fuel chemical storage areas etc. and the associated environmental risks.*

Response:

Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment. The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None at this stage.

2.1.28 Former Waste Disposal Sites

- *A specific policy should be included to ensure known historical waste disposal sites are assessed and appropriate remediation plans developed and implemented to reduce the environmental risk associated with such sites.*

Response:

Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment. The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None at this stage.

2.1.29 SEA and Infrastructure Planning

- *Adequate and appropriate infrastructure should be in place or required to be put in place to service any development proposed and authorised during the life of the Plan.*

Response:

Integration of this recommendation into the Draft Plan would be likely to have beneficial effects with regard to the protection of the environment. The provisions of the Draft Plan relating to waste water, drinking water, flooding and waste management - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None at this stage.

2.1.30 Legislative Obligations

- *It is a matter for Sligo Borough Council and Sligo County Council to ensure in undertaking and fulfilling their statutory responsibilities they are at all times compliant with the requirements of national and EU environmental legislation.*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None at this stage.

2.1.31 Ireland's Environment 2008

- *Sligo Borough Council and Sligo County Council should ensure that relevant Policies and Objectives are included in Sligo and Environs Development Plan, to address, where appropriate, the "Main Environmental Challenges" for Ireland as set out in Chapter 16 – "Main Environmental Challenges" of EPA Ireland's Environment 2008(EPA, October 2008).*

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None at this stage.

2.1.32 Environmental Report

- *It should be stated in the Introduction that the SEA is the responsibility of Sligo County Council and Sligo Borough Council.*

Response:

This is noted.

Updating the Environmental Report:

To state in Section 1.1 *Introduction and Terms of Reference* that the SEA is the responsibility of the two Councils.

2.1.33 Consultation

- *Consultation should be undertaken with the National Parks and Wildlife Service (NPWS) with regard to screening of the Plan for Appropriate Assessment (See Appendix 3).*

Response:

An Appropriate Assessment Screening exercise will be undertaken in order to determine whether or not the Draft Plan needs to undergo Appropriate Assessment.

Updating the Environmental Report:

None.

2.1.34 Non-Technical Summary

- *The inclusion of a summary of the overall findings and recommendations of the SEA in the Non – Technical Summary should be considered.*

Response:

The Non-Technical Summary summarises what is contained in the Environmental Report.

Updating the Environmental Report:

None.

2.1.35 Zone of Influence

- *The Environmental Report should identify the zone of influence of the Plan outside the Plan area e.g. possible impacts on air quality, water quality, habitat and protected areas in adjoining areas or counties.*

Response:

- The Environmental Report considers the likely significant impacts on air quality, water quality, habitat and protected areas both within and adjoining the Plan area.

Updating the Environmental Report:

None.

2.1.36 Relationship to other Plans

- *Provide an overview of the key relevant Plans and Programmes which impact on the proposed Plan and which the Plan has potential to impact and /or influence. Reference should be made as appropriate to the following (as well as other relevant P/Ps and significant projects):*

- *Lough Gill Catchment Management Plan;*
- *Flooding: Department of Environment, Heritage and Local Government's Consultation Draft Guidance –The Planning System and Flood Risk Management;*

Should the Draft guidance have implications on the current proposed and/existing zoning within the Plan area, the proposed zoning of lands within or adjacent to floodplains should be re-examined and should be reconsidered as appropriate.

The potential for significant conflicts between the Plan Policies and the other relevant Plans/Programmes should be described and assessed. Where significant conflicts exist, appropriate recommendations should be proposed to resolve these conflicts.

Response:

These points are noted.

Updating the Environmental Report:

To include information in Section 4 of the Environmental Report on the Lough Gill Catchment Management Plan and the new draft Planning Guidelines on the Planning System and Flood Risk Management.

2.1.37 Assessment of Environmental Effects

In assessing the likely significant effects of the Plan the full range of effects, as set out in Annex I of the SEA Directive - "secondary, cumulative, synergistic, short, medium and long term, permanent, temporary, positive and negative effects", should be assessed and reported on. It is not clear how and where this assessment has been undertaken.

In particular, the potential for cumulative effects in combination with other relevant Plans and projects within and adjoining the Plan area should be assessed.

The methodology applied in the assessment of the preferred option along with any assumptions made should be described.

Clarify how the "Overlay Mapping of Environmental Sensitivities" have been taken onto account in the environmental assessment of the Plan and development of the plan

The use of a table to summarise the assessment of the full range of environmental effects referred to above should be considered.

Response:

Refer to the following Sections of the Environmental Report:

- 3.10 Overlay Mapping of Environmental Sensitivities;
- 6 Description of Alternative Plan Scenarios;
- 7 Evaluation of Alternative Plan Scenarios; and,
- 8 Evaluation of Draft Plan Policies and Objectives.

Updating the Environmental Report:

None.

2.1.38 Assessment of Environmental Effects

The environmental assessment should include a description of the status of Sligo as national tourist destination and the related implications on population within the Plan area. This aspect should be assessed in the context of the increased demand placed on infrastructure- water supply, wastewater, energy, conflict with biodiversity etc. In considering the predicted increase in population, the potential for increased growth in tourism in the Plan area should be considered.

The preparation of an Integrated Sustainable Tourism Strategy for the Plan area should be considered as appropriate.

Response:

Comments with regard to fluctuations in population are noted.

The environmental effects of implementing changed/additional provisions of the Draft Plan relating to an Integrated Sustainable Tourism Strategy for the Plan area will be identified and evaluated.

Updating the Environmental Report:

Information on fluctuations in population and potential effects as a result of these fluctuations will be included in Section 3.3 *Population* and Section 3.7 *Material Assets* of the Environmental Report.

2.1.39 Water

Clarify how the Plan policies have taken into account the surface water and groundwater resources within the Plan area "at risk of not achieving good status".

Response:

The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.40 Flooding

Confirm whether a catchment approach to flood risk management, as required by the "Floods Directive" will be adopted for the Plan area and associated river/ lake catchments. If so what are the likely implications of this, on existing and /or proposed zoning/ development within the Plan area as well as upstream and downstream of the Plan area.

Response:

Information on the Floods Directive will be inserted into the Plan.

Updating the Environmental Report:

To include a subheading under Section 4.5.3 Flooding entitled EU Floods Directive as follows:

European Directive 2007/60/EC on the assessment and management of flood risks aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity. The Directive applies to inland waters as well as all coastal waters across the whole territory of the EU.

The Directive requires Member States to carry out a preliminary assessment by 2011 in order to identify the river basins and associated coastal areas at risk of flooding. For such zones flood risk maps are required to be drawn up by 2013. By 2015 flood risk management plans focused on prevention, protection and preparedness must be established by 2015.

The Directive is to be carried out in coordination with the Water Framework Directive and flood risk management plans and river basin management plans should be coordinated.

2.1.41 Air and Climate

Clarify whether traffic related noise is an issue within the Plan area and if so how the Plan policies have addressed this issue.

Response:

Noise emanates from traffic within the Plan area. The provisions of the Draft Plan - including the mitigation measures identified in Section 9 of the SEA Environmental Report which have been integrated into the Draft Plan - include this topic.

Updating the Environmental Report:

None.

2.1.42 Habitat Mapping

The 34 sites important for biodiversity identified in the habitat mapping undertaken for the county to date, which occur within the Plan area, should be identified as appropriate in the environment report. Information on their locations and biodiversity importance should be provided in the Plan also as appropriate.

Response:

The timely inclusion of available Habitat Mapping in the Environmental Report will be sought.

Updating the Environmental Report:

Relevant available habitat mapping and accompanying description will be included in Section 3.2 of Final Environmental Report.

2.1.43 Wetland Survey

A wetland survey is ongoing, timescale of completion should be in the environment report and the findings of this survey should be incorporated in to the environment report and draft plan on completion of the survey.

Response:

The timely inclusion of the findings of the Wetlands Study in the Environmental Report will be sought.

Updating the Environmental Report:

Relevant available information from the Wetlands Study will be included in Section 3.2 of Final Environmental Report.

2.1.44 Mitigation

Mitigation measures are clearly mentioned in both the plan and the environment report. Mitigation measures proposed should be directly linked to the specific relevant significant effects identified in the Environmental Report.

There would be merits in providing a summary table in the Environmental Report outlining how each likely significant effect is linked directly to relevant mitigation measure(s), monitoring measure(s) and, where appropriate a specific Policy or Objective in the Plan.

Overall, it should be ensured that mitigation measures are included for all likely significant effects and that all proposed mitigation measures are reflected by way of specific Policies/Objectives in the Plan. Where mitigation measures are proposed, a clear commitment to implement the necessary proposed mitigation measures should be included in the Plan.

Response:

Further integration of SEA and the Plan will be provided in the SEA Statement which will be produced on adoption of the Plan.

Updating the Environmental Report:

None.

2.1.45 Monitoring

Clarify how the proposed Monitoring Programme will address any significant gaps identified in environmental data during the environmental assessment process.

Describe how the Environmental Indicators proposed will provide "an early warning of significant unforeseen adverse effects".

Consideration should be given to the following, as appropriate, in the Monitoring Programme:

- *The use of environmental indicators as set out in the EPA's 'Environment in Focus 2006' and 'Water Quality in Ireland 2006' reports.*
- *Inclusion of an indicator to monitor tourist numbers and tourism related activity within the Plan area.*
- *"Drinking Water Quality" as an indicator under "Water";*

- *Extent of "Water Leakage" in the network as an indicator under "Material Assets"*
- *An indicator which addresses the "frequency and severity of flooding" in the Plan area;*
- *An indicator associated with "noise";*
- *Relevant indicators relating to the relative usage of "renewable energy".*
- *Monitoring of both positive and negative effects, where they occur.*
- *Inclusion of the on-going review of environmental targets and indicators in the monitoring programme. Responsibility for this role should be clearly defined.*

The Monitoring Programme should be flexible to take account of the various stages of the Plan and should be able to deal with specific environmental issues as they arise. The programme must be able to deal with the possibility of cumulative effects.

There would also be merits in including a commitment to oversee the implementation of mitigation measures and monitoring programme. There may be merits in establishing a Steering Committee tasked with these responsibilities.

There may be merits in including indicators for monitoring "water usage", "waste water generated", "energy usage", etc.

Response:

Measurements for indicators come from existing monitoring sources; the monitoring programme will not provide new environmental data.

The Environmental Indicators proposed can provide "an early warning of significant unforeseen adverse effects" by identifying declines in the state of the environment and/or a conflicts between environmental conditions and ideal targets.

Focus has been developed throughout the SEA, from the scoping stage to the compilation of the existing environmental baseline. Most attention has been given to environmental components which are likely to be impacted as a result of implementation of a Development Plan; some issues have not been selected for SEO development.

The monitoring programme provides for monitoring of differing types of effects including positive, negative and cumulative effects.

Monitoring of the Plan for the purposes of noise is provided for by Indicator HH1 which relates to human health.

Monitoring of the Plan for the purposes of flooding is provided for by Indicator W3 which relates to flood risk.

The two EPA Reports identified have been considered in the preparation of the Environmental Report.

The Environmental Report recommends the establishment of a Steering Committee to oversee the monitoring process.

Updating the Environmental Report:

To include the following indicator and target:

Indicator M3: Number of non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health

Target M3: No non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health

2.2 Development Planning Partnership Submission

The *italicised text* summarises the relevant part of the Development Planning Partnership submission.

2.2.1 CORINE Land Cover Mapping

There has been extensive discussion with the National Parks and Wildlife Service regarding the status and quality of lands surrounding Hazelwood House. The Lough Gill pNHA and cSAC is identified at page 19 of the SEA. Additionally, Figures 3.2-3.5 identify the Lough Gill Peninsula as Broadleaved Forest. There are a number of issues to raise in this case. Hazelwood forest is categorised as broadleaved, yet it is important to note that the "Hazelwood" area comprises a large area containing at least 3 different forestry types. Hazelwood Demesne contains EU Annex I broadleaved 'Alluvial Woodland'. Hazelwood peninsula contains the former Saehan Media site encompassing Hazelwood House and the former industrial buildings, facilities and surrounding lands. These lands are dominated by mixed broadleaved woodland, often dominated by non-native species such as beech and laurel. Patches of conifer plantation are also contained within the Saehan Media site. Coillte forestry also encompasses a large portion of Hazelwood Peninsula area surrounding the Saehan Media site and containing a mix of commercial conifer and broadleaved woodland.

Response:

See Footnote No. 5 of the Environmental Report which relates to the CORINE Land Cover dataset from the year 2000:

CORINE Land Cover (CLC) is a map of the European environmental landscape based on interpretation of satellite images. Land cover is the observed physical cover, as seen from the ground or through remote sensing, including for example natural or planted vegetation, water and human constructions which cover the earth's surface. Because of the scale of the CORINE data and the method by which it was collected there are likely to be a number of inaccuracies at the local level. It is noted, however, that the land cover shown on the maps is generally accurate. The European Environment Agency, in conjunction with the European Space Agency, the European Commission and member countries is currently updating the CORINE land cover database.

Updating the Environmental Report:

None.

2.2.2 CORINE Land Cover Mapping

In relation to the Lough Gill pNHA and cSAC designation within the Saehan Media site boundary, its importance and value is greater along the banks of the River Garavogue with a smaller area of semi-natural woodland in the south west corner of the Saehan Media site also noted by the NPWS to be of high ecological value. The ecological value of the remaining area depreciates. In the context of Hazelwood House, this has been recognised with the NPWS. Avoidance of such areas and proposed alternative habitat creation in adjoining and adjacent areas of Hazelwood through planting of native species such as Oak, to offset the loss of high value ecological habitat, has been discussed with NPWS and met with preliminary approval of such an approach.

Response:

Noted - this may be a matter for the NPWS in the future.

Updating the Environmental Report:

None.