

Ferrybank-Belview Local Area Plan

Strategic Environmental Assessment Statement

SEA Statement

April 2009

Carried out by the
National Building Agency



On behalf of
Kilkenny County Council



Ecological Survey carried out by
OPENFIELD Ecological Services



Section 1 Introduction

1.1 Terms of Reference

This is the SEA Statement of the Ferrybank-Belview Local Area Plan 2009 Strategic Environmental Assessment (SEA).

1.2 SEA Definition

Strategic Environmental Assessment (SEA) is a process for evaluating at the earliest appropriate stage, the environmental quality, and consequences of policies, plans or programmes. The purpose is to ensure that any significant effects on the environment of implementing a Plan are assessed, before it is adopted. Where negative impacts on the environment are likely to arise through implementation of the Plan, measures can be proposed in order to alleviate/negate these impacts. The process also gives interested parties an opportunity to comment and to be kept informed on decisions that may impact on the environment.

1.3 Legislative Context

Directive 2001/42/EC of the European Parliament and of the Council, of 27 June 2001, 'on the Assessment of the effects of certain plans and programmes on the Environment', the objective of which 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 and programmes with a view to promoting sustainable development, by ensuring that, in accordance with the Directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment'. Referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including land use planning.

The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI No. 435 of 2004), and, the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of regulations became operational on 21 July 2004.

The SEA Directive and the instruments transposing it into Irish Law require that after the adoption of a plan or programme, the plan or programme making authority is required to make a Statement available to the public, the competent environmental authorities and, where relevant, neighbouring countries. This Statement is referred to as an SEA Statement (DEHLG, 2004)¹.

1.4 Content of the SEA Statement

The SEA Statement is required to include information summarising:

- a) how environmental considerations and the Environmental Report were factored into the Plan,
- b) how submissions and observations made to the planning authority on the Draft Plan and Environmental Report were taken into account,
- c) the reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered, and
- d) the measures decided upon to monitor the significant environmental effects of implementation of the Plan.

¹ Department of the Environment, Heritage and Local Government (2004) Implementation of SEA Directive (2001/42/EC): Guidelines for Regional Authorities and Planning Authorities Dublin: Government of Ireland.

1.5 Implications of SEA for the Plan

As a result of the above legislation the Ferrybank-Belview LAP was required to undergo SEA.

The findings of SEA were expressed in an Environmental Report which was submitted to the Elected Members alongside the Draft Plan. The purpose of the report was to provide a clear understanding of the likely environmental consequences of decisions regarding the future development within the Ferrybank-Belview LAP area.

Amendments made to the Draft LAP were evaluated and screened for their environmental consequences and these were presented to the Elected Members. On adoption of the Draft LAP, the original Environmental Report was updated with the amendments into a final Environmental Report which accompanies the adopted Plan.

At each stage of the process the Elected Members were required by the legislation to take into account the Environmental Report and any environmental consequences from amendments before the adoption of the LAP.

Section 2 How Submissions / Consultations and Environmental Considerations were taken into account and integrated within the LAP Process

2.1 Consultations

SEA scoping consultations with the competent environmental authorities - the Environmental Protection Agency, the Department of the Environment, Heritage and Local Government and the Department of Communications, Marine and Natural Resources - informed the type of environmental issues which were chosen to be dealt with by the SEA as well as the level of detail with which these issues were addressed.

The scoping of the proposed plan involved an assessment of compliance with relevant plans and guidance documents at national, regional and local level and consideration of the issues which would result in likely significant impacts on the environment as a result of the proposed implementation of the Plan. Consultation took place in-house within Kilkenny County Council with the Heritage Officer, Biodiversity Officer, Conservation Officer, Environment Department, Transportation Department, Water Services Department, Community Recreation and Amenities Department. During the entire LAP process Waterford City Council were consulted at regular intervals. A number of meetings were held with John Andrews (Senior Planner in Waterford City Council) in attendance, ranging from internal council meetings, public presentations and workshops and meetings with the elected representatives (refer to Section 3.2)

2.2 Early Communication of Environmental Sensitivities

Significant environmental considerations were integrated into the Draft LAP before it was placed on public display for the first time. The existing Environmental Parameters of the area were mapped in order to identify which areas of LAP would be most sensitive to development and would suffer the most adverse effects if growth was to be accommodated in those areas. Factors influencing significant sensitivities in this area included topography, environmental designation, water, and ecology. (See LAP Map 4, Environmental Parameters). Also any existing evidence of archaeology and structures of architectural merit were identified and mapped.

2.3 Early Identification and Evaluation of Alternatives

A range of potential alternative scenarios (see Section 4) for the types of strategies for the LAP were identified at an early stage in the process and evaluated for their likely significant environmental effects.

Communication of this evaluation to the Elected Members through both the Environmental Report and presentations enabled the Elected Members to make an informed choice with regard to the adoption of the Ferry-Belview LAP.

2.4 Mitigation

Environmental considerations have also been integrated into the adopted Plan through a number of mitigation measures.

These measures, which are summarised below, will be implemented as part of the local area plan:

Mitigation Measures

	Potential Impacts	Mitigation Proposals
Ecology	Degradation to SAC/NHA designated areas.	No direct loss of habitat to the SAC and NHA is anticipated as a result of the LAP.
	Loss of scrub and recolonising bare ground in the Grannyferry area	<p>The NPWS stated that the land at the Red Bridge filling station has been the subject of much consultation and a plan for the site has been approved by ABP. The NPWS feel that the Retail Park Zoning is appropriate at this location from an ecological point of view.</p> <p>An area proposed for retail park further to the east by the New Rath roundabout has recently been infilled this area is under question and the NPWS would prefer no development to take place at this location. KCC propose to allow this area to be zoned however objectives are written into the LAP to 'maintain natural wetland characteristics and protect wetlands' within this area.</p> <p>Compensatory wetland areas could be provided and re-instated at another location in consultation with the NPWS.</p>
	Loss of bat populations through destruction of derelict buildings at Old Mill area in Grannagh	A specialist bat ecologist is to be commissioned to survey the vacant Mill buildings and recommend avoidance or mitigation measures in compliance with the Wildlife (Amendment) Act, 2000. Objective is written into the LAP to this effect.
	The development of Belview port and surrounds may involve the removal of wetland habitat which is directly adjacent to the SAC area.	An extension to the Port facilities has recently been approved by ABP and a comprehensive EIA was prepared for this area. All development covered in this planning application is to strictly adhere to all mitigation and monitoring measures as outlined in the <i>Port of Waterford Company – Extension to Belview Port EIS 2001 – 2005</i> .
	Zoning for Passive Open Space	The Zoning Map indicates that all key areas of woodland, riparian corridors, swamp and wet grassland have been zoned as POS - Passive Open Space/Green Links and Biodiversity Conservation .
	Zoning for built development on green field sites has the clear potential for removing significant stretches of Treelines and Hedgerows.	Hedgerows and Treelines have been mapped within the Objectives Map. Policy has also been written into the LAP requesting developers to carry out an ecological assessment where impacts on hedgerows and treelines are likely.
	Invasion of Cherry laurel. In the absence of intervention, the advance of this species will destroy its host forest.	A policy within this LAP is for KCC to work with local community groups / conservation groups to seek the eradication of the invasive Cherry Laurel species.
	Impact of Japanese knotweed	A policy within this LAP is for KCC to work with local community groups / conservation groups to seek the eradication of the invasive Japanese knotweed species.

Transportation	Strategically one new river crossing has been proposed. The optimal location for such a crossing will need further detailed examination.	A separate EIA would need to be carried out to assess the environmental consequences and overall environmental feasibility.
	Additional routes will also be needed in order to attain optimal circulation.	A traffic management appraisal should be carried out after the completion of the N25 and N9 upgrade to ensure the implementation of key transport objectives. A policy to this effect is written into the LAP.
Surface Water	Potential degradation of water quality due to an increase in population and surface water run-off.	'Sustainable Urban Drainage' (SUDS) will be fully integrated with the LAP, thereby minimising the potential impact of pollutant run-off from surface water. In light of these factors it is believed that the potential for negative impacts on water quality are not significant. It should be noted however that individual construction projects, such as the construction or expansion of wastewater treatment facilities, that may have the potential to impact negatively on the conservation status of the SAC, are subject to their own Assessment.
Waste water Treatment	The new wastewater treatment plant currently being built is to become operational this year.	Further development is to be restricted until this treatment plant comes online. Additional septic tank use is also to be curtailed. The provision of efficient drainage systems with separate foul and surface water networks are to be required in all new developments and the necessary gravity and pumping stations are to be provided to service all zoned lands.
Archaeology	Features of archaeological potential are to be duly considered and protected where appropriate.	Proposed developments that may, due to their size, location or nature, have implications on the archaeological heritage of the plan area, will be subject to an archaeological assessment.
Built Heritage	There are a number of structures of architectural merit within the Ferrybank-Belview area.	Planning applications that would impinge upon any structure of architectural heritage merit are to be referred to the Architectural Heritage Advisory Unit of the DoEHLG, and where considered necessary prevent development that would be inappropriate or cause damage to such structures.

2.5 The Draft LAP and Amendments

As a result of the above legislation, certain plans and programmes which are prepared by Kilkenny County Council - including Local Area Plans - are required to undergo some form of SEA. Although it is not mandatory to carry out a full SEA, as the area in question has a population of considerably less than 10,000 persons, it was deemed appropriate in this case to prepare a scoping report and ultimately an environmental report on the Ferrybank/Belview LAP due to the siting of two European and National protection designations within the boundary of this LAP.

The findings of the SEA were expressed in an Environmental Report which was submitted to the Elected Members alongside the LAP. The Draft LAP and Environmental Report were each placed on public display during which submissions and observations were invited. At the end of each of these periods a report was prepared by the Manager proposing changes which arose from certain submissions and observations made during the relevant display period to, where relevant, the Draft LAP or the Amendments. A screening of any proposed

amendments to the LAP was carried out and also submitted to the members. Any amendments to the Environmental Report from submissions/observations were highlighted in the Manager's Report.

Section 3 Environmental Report and Submissions & Observations

3.1 Introduction

This section details how both the Environmental Report and submissions and observations made to the planning authority on the Environmental Report and SEA process have been taken into account during the preparation of the plan.

3.2 SEA Scoping Consultations

The following relevant statutory bodies were consulted with regard to their opinion on what issues should be included in the SEA:

- 1) Environmental Protection Agency (EPA),
- 2) Minister for the Environment, Heritage and Local Government,
- 3) Minister for Communications, Energy and Natural Resources,

The following is a summary of the issues raised by all three bodies, which they consider should form part of the Environmental Report.

The issues raised by the EPA include:

- Provision of adequate drinking water supply,
- The Plan should implement and include, as appropriate, the relevant recommendations set out in *The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2006-2007*, (Office of Environment Enforcement- EPA, 2007).
- Promotion of water conservation measures,
- Promotion of the use of Rainwater Harvesting Systems where possible and appropriate,
- Specific provisions for the implementation of the relevant recommendations set out in *Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2004 and 2005* (Office of Environment Enforcement- EPA, 2007),
- Zoning for development should be linked to availability of treatment infrastructure. Priority should be given to provision of adequate infrastructure in advance of any development,
- A cessation of the current practice of untreated wastewater discharge to the River Suir should be sought during the life time of the Plan,
- Protection of surface and groundwater resources and their associated habitats and species,
- Provision and promotion of adequate and appropriate Sustainable Urban Drainage Systems,
- Management of flood risk. 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,
- Promotion of energy conservation measures in buildings,
- Provision of sustainable modes of transport,
- Development of traffic management measures to reduce the potential for traffic congestion and associated vehicular emissions,
- Provision of adequate and appropriate amenity to serve both existing community and likely future increases in population,
- Protection of the air quality in the Plan area,
- Protection of local biodiversity features – including rivers, wetlands, hedgerows, individual trees, streams, grassland etc,
- Protection, management, and as appropriate, enhancement of existing wetland habitats should be considered where flood protection/management measures are necessary,
- Protection of sites and features of archaeological importance,
- Protection of structures, features and zones of architectural value,
- Enhancement of existing views and prospects likely to be associated with the proposed Plan.

The *Department of Environment, Heritage and Local Government* recommended that the following environmental issues should be addressed in the environmental report:

- The impact on protected plants and animals. This should include the impact on animals such as otters, badgers, bats and birds. The impacts should include those of disturbance and/or loss of habitat and loss of roosting and feeding area,
- The impact on habitats outside of designated areas. This should include loss of habitats such as hedgerows, water courses and wetlands,
- The impact on the designated sites of the River Suir and Grannyferry. The impacts to be addressed should include habitat degradation and disturbance of species from amenity use by humans and water quality issues arising from any increase in discharges into the River.
- With regard to architectural heritage, due recognition should be given to significant elements of architectural heritage in the vicinity. The SEA process should identify the implication of the scale, type, location of significant development envisaged in the vicinity of structures of architectural merit, including demense lands and the perceived effect of that development on those elements of the architectural heritage.
- Impact of the plan on archaeological heritage, with the aim to avoid any direct impacts on known archaeological sites. Consideration must also be given to the discovery of unknown archaeology.

The issues raised by the Minster for Communications, Energy and Natural Resources include:

- Water quality in terms of surface water drainage and effluent discharges,
- Impacts on aquatic habitats,
- Potential increased flood risks,
- Potential disturbance of bio-diversity,
- Potential threat to aquaculture from Wastewater Treatment Plant discharge to the marine environment as Waterford Harbour and Estuary is a prime shellfish growing area.

Consultation with the community and local stakeholders took place in November 2004 and information arising from this was also considered as part of the LAP. The main issues, themes and proposals arising from the consultation process related to the following areas:

- Provision of a new Garda Station,
- Provision of community facilities and areas of open space and parkland,
- Provision of facilities for the youth,
- Congestion issues along the N25: traffic calming, safe pedestrian crossings, new urban street structure,
- Area needs a defined centre/heart to include shops, restaurants, social amenities etc,
- Provision of facilities for the elderly,
- Provision of walkways,
- Improvements to public transport,
- Amenity potential of access to the river,
- Protection of the environment.

Issues raised at Scoping Stage	Action in LAP
The Plan should implement and include, as appropriate, the relevant recommendations set out in <i>The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2006-2007, (Office of Environment Enforcement- EPA, 2007)</i> .	Policy ENP1.2
Promotion of water conservation measures	Policy ENP1.1
Specific provisions for the implementation of the relevant recommendations set out in <i>Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2004 and 2005 (Office of Environment Enforcement- EPA, 2007)</i>	This publication is to be referred to and a policy put in place to ensure compliance with its recommendations.

Zoning for development should be linked to availability of treatment infrastructure. Priority should be given to provision of adequate infrastructure in advance of any development	Policy ENP2.2
A cessation of the current practice of untreated wastewater discharge to the River Suir should be sought during the life time of the Plan,	This is a policy within the County Development Plan.
Protection of surface and groundwater resources and their associated habitats and species,	Policies ENP3
Provision and promotion of adequate and appropriate Sustainable Urban Drainage Systems,	Policy ENP3.6
Management of flood risk. 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,	Any areas liable to flooding have been zoned for open space.
Promotion of energy conservation measures in buildings,	Section 2.11.5 and 3.8 specifically deal with energy conservation in buildings.
Provision of sustainable modes of transport,	Numerous policies and objectives have been stated in the Plan (Section 2.1.6 & 2.1.7) outlining the provision of sustainable modes of transport.
Development of traffic management measures to reduce the potential for traffic congestion and associated vehicular emissions,	Numerous policies and objectives have been stated in the Plan (Section 2.1.6 & 2.1.7) outlining traffic management measures.
Provision of adequate and appropriate amenity to serve both existing community and likely future increases in population,	Policies TP3, TP4 and Section 2.8.
Protection of the air quality in the Plan area,	
Protection of local biodiversity features – including rivers, wetlands, hedgerows, individual trees, streams, grassland etc,	Section 2.6
Protection, management, and as appropriate, enhancement of existing wetland habitats should be considered where flood protection/management measures are necessary,	Section 2.6
Protection of sites and features of archaeological importance,	Section 2.4
Protection of structures, features and zones of architectural value,	Section 2.3
Enhancement of existing views and prospects likely to be associated with the proposed Plan.	Objective NE1

3.3 Submissions and Observations

There were only two submissions specifically in relation to the SEA Environmental Report:

- 1) The *Spatial Policy Unit, Department of the Environment, Heritage and Local Government*, which stated that the Environmental Report was very comprehensive, however, it is recommended that the issue of surface water and groundwater abstraction be addressed further in the environmental report (this issue is addressed below).
- 2) The *Office of Environmental Assessment, Environmental Protection Agency*, which detailed a number of comments in relation to referencing documents within the Env. Report pertaining to water and biodiversity. Also incorporating further detailed assessments and the use of further tables (see Appendix A).

All the above comments were in relation to amendments for the Environmental Report and did not involve changing the Draft Plan.

Relevant changes made to the LAP itself, as a result of individual or multiple submissions, were evaluated and screened in a separate document and submitted to the Council for review.

Section 4 Alternatives and the Plan

4.1 Introduction

The scoping process and baseline information gathered highlighted a number of key issues, which were explored in the formulation of alternative development strategies for the LAP lands. A number of models were examined, six in total. Consideration was also given to a do-nothing scenario.

4.1 Strategic Development Models

Due to the lower hierarchical level of LAPs certain strategic planning issues were already determined at National, Regional and County level and therefore the strategic options were somewhat limited within the scope of the LAP.

The models examined include:

- 1) **Re-balancing Model** which would see growth to the west of the area primarily concentrated around the golf course and the Newrath area. This model would allow for the rebalancing of existing residential development which has been traditionally centred on the N25 entrance into Waterford City.
- 2) A **Concentric Model** would allow for development in all directions from existing development. The concentric model would allow for residential development on lands adjoining existing development and would include the golf course.
- 3) The **Compact Urban Centre** was also considered which would allow for a compact urban form concentrating on the existing developed areas and allowing for the development of the golf course for residential development.
- 4) A **Polycentric Model** of development was also considered for the area with development concentrated in nodes at the existing developed areas, Belview Port, Slieverue, Cloone, Newrath, N/M9 interchange and Grannagh Business Park.
- 5) A **Strategic Rail Model** was also taken into consideration. Development would be concentrated to the east of existing development along the old Waterford-New Ross line. This would allow for high density sustainable development based on the reintroduction of a train passenger service.
- 6) A series of **Neighbourhood Centres** were also considered, these centres would be located on the boundaries of the existing developed areas of Christendom, Rathcullihen, Belmont, Rockshire and Newrath. Neighbourhood centres would be located at least 500 metres of walking distance and provide essential local services.

4.2 Evaluation

P = Positive

N = Negative

Nu = Neutral

Plan Objectives	1	2	3	4	5	6
Natural Environment						
Protection of Ecological Features: The Local Area Plan (LAP) seeks the protection of the unique environmental setting of the Waterford Environs area, and in particular, its relationship with the River Suir.	Nu	N	Nu	N	N	Nu
Creation of a Riverside Amenity: The LAP promotes the creation of a riverside walkway stretching from Rockland Woods in Christendom to Belview Port.	N	N	P	N	N	Nu

Protect, maintain, improve and enhance the quality of watercourses throughout the plan area, through the promotion of Sustainable Urban Drainage Systems (SUDS).	N	N	P	N	N	P
Retain, where possible, significant hedgerows and tree groupings and incorporate into future development layouts within the area.	Nu	Nu	Nu	N	N	Nu
Require future planning applications for development in the vicinity of the proposed NHA (Grannyferry) and the SAC (Lower River Suir) to include a report on the likely potential impacts and any necessary mitigation impacts. This report should be carried out by a professional ecologist or other suitably qualified professional.	N	N	Nu	Nu	Nu	Nu
Planning applications within 30 metres of designated wetland/peatland ecological sites must be accompanied by an eco-hydrological assessment: which complies with Section 18 of the European Communities (Natural Habitats) Regulations 1997 and must also be accompanied by evidence of consultation between the applicant and the National Parks and Wildlife Service with regard to the findings of this assessment.	N	N	Nu	Nu	Nu	Nu
Residential and Mixed Use						
Compact Residential Model: The LAP proposes a residential strategy of consolidation and infill, whereby new residential development will occur along side existing. This will enable the development of a compact residential model in the plan area, in preference to a pattern of dispersed housing and peripheral sprawl.	N	N	P	N	P	P
Network of Neighbourhood Centres: The LAP proposes a number of neighbourhood centres at strategic locations in the plan area. These will serve the needs of both new and existing residential areas, enabling them to become more sustainable living environments.	N	N	P	N	N	P
New Mixed Use Zones: The LAP proposes mixed-use zones at Newrath and Christendom, which have been given a zoning of C2: Commercial and Mixed Use. These zones will combine retail, commercial and service uses with higher density residential development. There will also be a strong focus on the creation of enterprise zones and community facilities in these areas.	P	N	P	N	N	P
Arcadian Residential Development: The LAP proposes an Arcadian Residential zoning (R0) at a number of locations in the plan area. Arcadian Development is based on the principle of low density housing which is hidden in the landscape, and generally developed on sites which already include mature trees and hedges. These zonings are proposed in visually sensitive areas, and in areas which already feature low density residential development.	Nu	Nu	N	Nu	N	Nu
Industry & Employment						
Rejuvenation of existing and former industrial lands: The LAP aims to strengthen the Waterford Environs' potential to attract inward investment. At present, the area suffers from an over reliance on meat processing and related industries. Thus, the proposed Waterford Environs LAP aims to facilitate the diversification of the area's industrial base into one which is more reflective of industry today; particularly service and knowledge based industries, as well as more specialised industries such as pharmaceuticals. In this regard, key sites include the former site of Newrath Mills and the AIBP plant in Christendom.	N	N	P	N	Nu	Nu
Belview Port: The LAP recognises that the performance of Belview Port is of central importance to the economic development of the Waterford Environs. The continued growth of port activities will enable the development of employment opportunities in the wider Belview area.	N	N	P	N	N	Nu

Transport						
Potential of Existing Railway Lines: The LAP proposes to preserve the Waterford to New Ross railway line, which is currently disused. In addition, a number of buffer zones have been identified along this line. These zones will be kept free from development in order to accommodate potential rail transit stops in the future. A key element of this strategy is to encourage high density development adjacent to, and along, this railway line in the future.	N	N	P	N	P	Nu
Making Connections: The LAP recognises that enhanced connectivity between the plan area and Waterford City is vital for long-term development of both areas. It is acknowledged that there is a need for a third river crossing over the Suir, incorporating a pedestrian connection. Therefore, this LAP has identified optimal locations for these connections.	N	N	P	N	N	P
Facilitate the delivery of the proposed Green Route Link to include bus stops and pick up points throughout the proposed urban village and facilitate the introduction of Park and Ride facilities in tandem with the Green Route.	N	N	P	N	N	P
Increase the provision of cycle paths in the plan area, particularly through the open space links.	Nu	Nu	Nu	Nu	Nu	Nu
Urban Village						
Facilitate the development of a "main street" as part of the urban village concept at Ferrybank-Abbeylands	N	N	P	N	N	Nu
Built Heritage						
Ensure the protection of all structures identified in the Built Heritage Map.	Nu	Nu	Nu	Nu	Nu	Nu
Archaeology						
Preserve and protect the archaeological heritage of the Waterford Environs and safeguard the integrity and setting of recorded sites	Nu	Nu	Nu	Nu	Nu	Nu
Energy						
Establish a Sustainable Energy Zone (SEZ) for undeveloped lands identified at Christendom and Newtown, including lands proposed for redevelopment. All future development in these areas will be required to ensure the supply of 20 per cent heat and electricity from renewable sources over the period of the plan.	N	N	P	Nu	Nu	Nu
Waste Management						
Implement the Joint Waste Management Plan for the South East Region 2006-2011	Nu	Nu	Nu	Nu	Nu	Nu
Implementation						
Prepare a schedule for the implementation of Development Objectives, which will identify each objective, an implementation strategy, primary responsibility (i.e., LA department, private developers, etc.) and proposed timeline.	Nu	Nu	Nu	Nu	Nu	Nu

Option	Positive	Negative	Neutral
1	1	13	8
2	0	15	7
3	12	1	9
4	0	13	9
5	2	11	9
6	6	0	16

4.3 Summary of Analysis

Option 3 **The Compact Urban Centre** and option 6 **A series of Neighbourhood Centres** resulted in the most positive outcomes when compared against the Plan Objectives, therefore it was felt appropriate to incorporate these two options as the preferred alternative. The **compact urban centre and neighbourhood centres** will allow for the infilling of appropriately located land adjacent to existing developed areas where services and facilities are either already in place or can be developed in tandem with residential development. Appropriate densities will also be able to be accommodated, which will provide the area with a critical mass from which to provide sustainable transport modes, travel patterns and the sustainable use of land.

Having considered the various options it was felt that the recommended model for the area is one of **Compact Urban Centre that would include neighbourhood centres** (this would be in preference to uncontrolled peripheral sprawl and dispersed urban generated housing in the more rural areas). The aim therefore is to consolidate growth in the existing areas of development and allow for residential development to the east, north and west of the existing residential estates of Christendom, Abbeylands, Belmont and Rockshire. It is envisaged that a number of neighbourhood centres will be included in this model while a town centre zoning which already exists for the Ferrybank lands within the boundary of Waterford Borough will be expanded to include the district shopping centre currently under construction and some lands to the north and east of the district centre.

The Strategy will allow for a more compact urban form that will support public transport and pedestrian movement patterns. Medium to high density housing will form part of the model with some low density development (RO: Residential Arcadian) being permitted.

The continued development of Belview Port as an important national strategic port is central to the economic development of the area. Its strategic location and its quick accessibility to the national routeways should ensure that its stature grows in the future. It is envisaged that various employment will be generated with the growth of port activities. It is therefore important that sufficient lands are zoned for the continued growth of the port.

In essence, the model for the area is a development corridor extending along the N25 from Gorteens in the east to Newrath in the west. Development at Belview and Grannagh will be stand alone in terms of having port-related, industrial or retail warehousing zonings while residential development will be concentrated in the areas of existing development. The model will also interact with the redevelopment plans for the north quays and the Slieverue area and their projected populations. Development will be encouraged around the Ferrybank-Abbeylands shopping centre, while the intensity of development will be gradually reduced the further away from the corridor or in the advent of more environmentally sensitive areas.

Section 5 Monitoring

5.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored.

Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action.

5.2 Action and Responsibility

	Potential Impacts	Mitigation Proposals	Action to be taken by	Monitor
Ecology	Loss of bat populations through destruction of derelict buildings at Old Mill area in Grannagh	A specialist bat ecologist is to be commissioned to survey the vacant Mill buildings and recommend avoidance or mitigation measures in compliance with the Wildlife (Amendment) Act, 2000. Objective is written into the LAP to this effect.	Survey to be requested of the developer at planning application stage by KCC.	To comply with findings from specialist survey.
	The development of Belview port and surrounds may involve the removal of wetland habitat which is directly adjacent to the SAC area.	An extension to the Port facilities has recently been approved by ABP and a comprehensive EIA was prepared for this area. All development covered in this planning application is to strictly adhere to all mitigation and monitoring measures as outlined in the <i>Port of Waterford Company – Extension to Belview Port EIS 2001 – 2005</i> .	Developer	To comply with findings from EIS
	Zoning for built development on green field sites has the clear potential for removing significant stretches of Treelines and Hedgerows.	Hedgerows and Treelines have been mapped within the Objectives Map. Policy has also been written into the LAP requesting developers to carry out an ecological assessment where impacts on hedgerows and treelines are likely.	Assessment to be requested of the developer at planning application stage by KCC.	Heritage Section to establish hedgerow/treeline baseline information from the collation of ecological assessment
	Invasion of Cherry laurel. In the absence of intervention, the advance of this species will destroy its host forest.	A policy within this LAP is for KCC to work with local community groups / conservation groups to seek the eradication of the invasive Cherry Laurel species.	KCC is to initiate the NeighbourWood Scheme, which promotes the restoration of Ireland's native woodland in consultation with local community groups.	LAP is reviewed every six years including review of the steps taken & status of all policies and objectives.
	Impact of Japanese knotweed	A policy within this LAP is for KCC to work with local community groups / conservation groups to seek the eradication of the invasive Japanese knotweed species.	KCC is to initiate the NeighbourWood Scheme, which promotes the restoration of Ireland's native woodland in consultation with local community groups.	LAP is reviewed every six years including review of the steps taken & status of all policies and objectives.
Transportation	Strategically one new river crossing has been proposed. The	A separate EIA would need to be carried out to assess the environmental consequences and overall environmental feasibility.		To comply with findings from EIS

	optimal location for such a crossing will need further detailed examination.			
	Additional routes will also be needed in order to attain optimal circulation.	A traffic management appraisal should be carried out after the completion of the N25 and N9 upgrade to ensure the implementation of key transport objectives. A policy to this effect is written into the LAP.	KCC's transportation department is to initiate traffic management study.	LAP is reviewed every six years including review of the steps taken & status of all policies and objectives.
Surface Water	Potential degradation of water quality due to an increase in population and surface water run-off.	'Sustainable Urban Drainage' (SUDS) will be fully integrated with the LAP, thereby minimising the potential impact of pollutant run-off from surface water. In light of these factors it is believed that the potential for negative impacts on water quality are not significant. It should be noted however that individual construction projects, such as the construction or expansion of wastewater treatment facilities, that may have the potential to impact negatively on the conservation status of the SAC, are subject to their own Assessment.	KCC, Developers.	Water Quality will be monitored through the various forms of legislation. In compliance with the SUDS strategy, appropriate maintenance plans stipulating the necessary agreements on maintenance liabilities between stakeholders, e.g. Water Services, Transportation Department, Parks Department, etc. shall be agreed prior to development. The maintenance plans shall be framed within any subsequent 'Taking In Charge' procedures for the drainage infrastructure implemented by KCC, following the development of lands in the future.
Waste water Treatment	The new wastewater treatment plant currently being built is to become operational this year.	Further development is to be restricted until this treatment plant comes online. Additional septic tank use is also to be curtailed. The provision of efficient drainage systems with separate foul and surface water networks are to be required in all new developments and the necessary gravity and pumping stations are to be provided to service all zoned lands.	KCC, Developers.	LAP is reviewed every six years including review of the steps taken & status of all policies and objectives. Water quality is monitored as above.
Archaeology	Features of archaeological potential are to be duly considered and protected	Proposed developments that may, due to their size, location or nature, have implications on the archaeological heritage of the plan area, will be subject to an	Assessment to be requested of the developer at planning application stage	LAP is reviewed every six years including review of the steps taken & status

	where appropriate.	archaeological assessment.	by KCC.	of all policies and objectives.
Built Heritage	There are a number of structures of architectural merit within the Ferrybank-Belview area.	Planning applications that would impinge upon any structure of architectural heritage merit are to be referred to the Architectural Heritage Advisory Unit of the DoEHLG, and where considered necessary prevent development that would be inappropriate or cause damage to such structures.	KCC, DoEHLG	LAP is reviewed every six years including review of the steps taken & status of all policies and objectives.

5.3 Overall Findings

Environmentally significant impacts were identified as being likely in relation to the following areas: ecology and biodiversity, visual amenity, surface water quantity and quality, waste water treatment, and transportation.

The Ferrybank-Belview area contains a surprising wealth of important semi-natural habitats. If the region is to develop in a sustainable fashion, then these ecological resources must be safeguarded. This plan was found to have only one major potential negative impact on biodiversity, namely the cumulative impacts of removal of Hedgerows and Treelines, some of which are hundreds of years old. Doing nothing may also be an impact where alien invasive species are not controlled.

These, and other impacts identified in this report, can all be addressed through careful planning as detailed in the suggested recommendations and mitigation measures. Implementation of these actions would help to ensure that sustainable development becomes a reality under this plan.

The chosen development strategy as set out in the LAP has been assessed in terms of sustainability and potentially significant environmental impacts, with the environmental objectives of the SEA assessed against the objectives of the LAP. This assessment shows that the strategy is overall acceptable.

Where negative impacts are likely, mitigation and monitoring measures have been identified. The implementation of these measures will ensure the LAP is acceptable from an environmental and sustainability perspective.

APPENDIX A

Amendments to SEA Environmental Report

Submission DFB6 Office of Environmental Assessment, Environmental Protection Agency

The comments below relate to the Strategic Environmental Assessment Process and the Environmental Report. Comments and suggestions in this Section are put forward for consideration and mainly relate to the key stages and outputs of the SEA Process.

1. Consultation

Confirm the nature and extent of any consultation with the adjoining Local Authorities, Waterford City and County Councils, on the Draft Local Area Plan (the Plan).

To be inserted in Section 2.0, *Scoping* 'During the entire LAP process Waterford City Council were consulted at regular intervals. A number of meetings were held with John Andrews (Senior Planner in Waterford City Council) in attendance, ranging from internal council meetings, public presentations and workshops and meetings with the elected representatives.'

2. Existing Environment

The section dealing with evolution of the environment without implementation of the Plan is very brief (Section 6.0). Consideration should be given to the inclusion of a more detailed analysis of the evolution of the environment in the absence of the Plan.

To be inserted at the start of Section 6.0 'The future growth of this area has been identified and set in place through a number of previous higher level plans, namely, the *National Development Plan 2007-2013*, *National Spatial Strategy 2002-2020*, *South-East Regional Planning Guidelines 2004-2020*, *Waterford Planning, Land Use and Transportation Study 2002-2020*, *Waterford City Development Plan 2007-2013*, and *Kilkenny County Draft Development Plan 2008-2014* (refer to Section 4.0). Therefore, in the absence of a detailed landuse plan for this area development pressures would still occur. However, without any overall vision for the area, any subsequent development would take place in an ad-hoc manner resulting in an un-coordinated approach to the overall integration of development, services and facilities. This would be contradictory to the proper planning and sustainability of the area.'

3. Environmental Objectives

You should clearly demonstrate how each issue raised at the scoping stage has been addressed or not via the SEA. Clear justification should be provided for those issues that have not been included in the SEA process.

Insert table

Issues raised at Scoping Stage	Action in Draft Plan
The Plan should implement and include, as appropriate, the relevant recommendations set out in <i>The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2006-2007</i> , (Office of Environment Enforcement- EPA, 2007).	Policy ENP1.2
Promotion of water conservation measures	Policy ENP1.1

Specific provisions for the implementation of the relevant recommendations set out in <i>Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons – A Report for the Years 2004 and 2005 (Office of Environment Enforcement- EPA, 2007)</i>	This publication is to be referred to and a policy put in place to ensure compliance with its recommendations.
Zoning for development should be linked to availability of treatment infrastructure. Priority should be given to provision of adequate infrastructure in advance of any development	Policy ENP2.2
A cessation of the current practice of untreated wastewater discharge to the River Suir should be sought during the life time of the Plan,	This is a policy within the County Development Plan.
Protection of surface and groundwater resources and their associated habitats and species,	Policies ENP3
Provision and promotion of adequate and appropriate Sustainable Urban Drainage Systems,	Policy ENP3.6
Management of flood risk. 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,	Any areas liable to flooding have been zoned for open space.
Promotion of energy conservation measures in buildings,	Section 2.11.5 and 3.8 specifically deal with energy conservation in buildings.
Provision of sustainable modes of transport,	Numerous policies and objectives have been stated in the Plan (Section 2.1.6 & 2.1.7) outlining the provision of sustainable modes of transport.
Development of traffic management measures to reduce the potential for traffic congestion and associated vehicular emissions,	Numerous policies and objectives have been stated in the Plan (Section 2.1.6 & 2.1.7) outlining traffic management measures.
Provision of adequate and appropriate amenity to serve both existing community and likely future increases in population,	Policies TP3, TP4 and Section 2.8.
Protection of the air quality in the Plan area,	
Protection of local biodiversity features – including rivers, wetlands, hedgerows, individual trees, streams, grassland etc,	Section 2.6
Protection, management, and as appropriate, enhancement of existing wetland habitats should be considered where flood protection/management measures are necessary,	Section 2.6
Protection of sites and features of archaeological importance,	Section 2.4
Protection of structures, features and zones of architectural value,	Section 2.3
Enhancement of existing views and prospects likely to be associated with the proposed Plan.	Objective NE1

4. Selection and Assessment of Alternatives

The development and assessment of Plan alternatives is considered to be brief.

There is a number of ways of fulfilling the Plans objectives and at the same time protecting the environment. The following is recommended:

- Assess each alternative in terms of its potential to deliver sustainable development. The use of a matrix is recommended.

- Describe the methodology applied in the assessment of alternatives along with any assumptions made.
 - Describe the preferred alternative in some detail. Clear justification should be provided for the selection of the preferred alternative/combination of alternatives. While the objectives of the preferred alternative have been outlined in the Environmental Report, the basis for the choice of alternative is not explored or explained in any great detail.
- 1) **Re-balancing Model** which would see growth to the west of the area primarily concentrated around the golf course and the Newrath area. This model would allow for the rebalancing of existing residential development which has been traditionally centred on the N25 entrance into Waterford City.
 - 2) A **Concentric Model** would allow for development in all directions from existing development. The concentric model would allow for residential development on lands adjoining existing development and would include the golf course.
 - 3) The **Compact Urban Centre** was also considered which would allow for a compact urban form concentrating on the existing developed areas and allowing for the development of the golf course for residential development.
 - 4) A **Polycentric Model** of development was also considered for the area with development concentrated in nodes at the existing developed areas, Belview Port, Slieverue, Cloone, Newrath, N/M9 interchange and Grannagh Business Park.
 - 5) A **Strategic Rail Model** was also taken into consideration. Development would be concentrated to the east of existing development along the old Waterford-New Ross line. This would allow for high density sustainable development based on the reintroduction of a train passenger service.
 - 6) A series of **Neighbourhood Centres** were also considered, these centres would be located on the boundaries of the existing developed areas of Christendom, Rathculliheen, Belmount, Rockshire and Newrath. Neighbourhood centres would be located at least 500 metres of walking distance and provide essential local services.

Insert in Section 9.1

P = Positive
 N = Negative
 Nu = Neutral

Plan Objectives	1	2	3	4	5	6
Natural Environment						
Protection of Ecological Features: The LAP (LAP) seeks the protection of the unique environmental setting of the Waterford Environs area, and in particular, its relationship with the River Suir.	Nu	N	Nu	N	N	Nu
Creation of a Riverside Amenity: The LAP promotes the creation of a riverside walkway stretching from Rockland Woods in Christendom to Belview Port.	N	N	P	N	N	Nu
Protect, maintain, improve and enhance the quality of watercourses throughout the plan area, through the promotion of Sustainable Urban Drainage Systems (SUDS).	N	N	P	N	N	P
Retain, where possible, significant hedgerows and tree groupings and incorporate into future development layouts within the area.	Nu	Nu	Nu	N	N	Nu
Require future planning applications for development in the vicinity of the proposed NHA (Grannyferry) and the SAC (Lower River Suir) to include a report on the likely potential impacts and any necessary mitigation impacts. This report should be carried out by a professional ecologist or other suitably qualified professional.	N	N	Nu	Nu	Nu	Nu
Planning applications within 30 metres of designated wetland/peatland ecological sites must be accompanied by an eco-hydrological assessment: which complies with Section 18 of the European Communities (Natural Habitats) Regulations 1997 and must also be accompanied by evidence of consultation between the	N	N	Nu	Nu	Nu	Nu

applicant and the National Parks and Wildlife Service with regard to the findings of this assessment.						
Residential and Mixed Use						
Compact Residential Model: The LAP proposes a residential strategy of consolidation and infill, whereby new residential development will occur along side existing. This will enable the development of a compact residential model in the plan area, in preference to a pattern of dispersed housing and peripheral sprawl.	N	N	P	N	P	P
Network of Neighbourhood Centres: The LAP proposes a number of neighbourhood centres at strategic locations in the plan area. These will serve the needs of both new and existing residential areas, enabling them to become more sustainable living environments.	N	N	P	N	N	P
New Mixed Use Zones: The LAP proposes mixed-use zones at Newrath and Christendom, which have been given a zoning of C2: Commercial and Mixed Use. These zones will combine retail, commercial and service uses with higher density residential development. There will also be a strong focus on the creation of enterprise zones and community facilities in these areas.	P	N	P	N	N	P
Arcadian Residential Development: The LAP proposes an Arcadian Residential zoning (R0) at a number of locations in the plan area. Arcadian Development is based on the principle of low density housing which is hidden in the landscape, and generally developed on sites which already include mature trees and hedges. These zonings are proposed in visually sensitive areas, and in areas which already feature low density residential development.	Nu	Nu	N	Nu	N	Nu
Industry & Employment						
Rejuvenation of existing and former industrial lands: The LAP aims to strengthen the Waterford Environs' potential to attract inward investment. At present, the area suffers from an over reliance on meat processing and related industries. Thus, the proposed Waterford Environs LAP aims to facilitate the diversification of the area's industrial base into one which is more reflective of industry today; particularly service and knowledge based industries, as well as more specialised industries such as pharmaceuticals. In this regard, key sites include the former site of Newrath Mills and the AIBP plant in Christendom.	N	N	P	N	Nu	Nu
Belview Port: The LAP recognises that the performance of Belview Port is of central importance to the economic development of the Waterford Environs. The continued growth of portal activities will enable the development of employment opportunities in the wider Belview area.	N	N	P	N	N	Nu
Transport						
Potential of Existing Railway Lines: The LAP proposes to preserve the Waterford to New Ross railway line, which is currently disused. In addition, a number of buffer zones have been identified along this line. These zones will be kept free from development in order to accommodate potential rail transit stops in the future. A key element of this strategy is to encourage high density development adjacent to, and along, this railway line in the future.	N	N	P	N	P	Nu
Making Connections: The LAP recognises that enhanced connectivity between the plan area and Waterford City is vital for long-term development of both areas. It is acknowledged that there is a need for a third river crossing over the Suir, incorporating a pedestrian connection. Therefore, this LAP has identified optimal locations for these connections.	N	N	P	N	N	P
Facilitate the delivery of the proposed Green Route Link to include bus stops and pick up points throughout the proposed urban village and facilitate the introduction of Park and Ride facilities in tandem with the Green Route.	N	N	P	N	N	P
Increase the provision of cycle paths in the plan area, particularly through the open space links.	Nu	Nu	Nu	Nu	Nu	Nu

Urban Village						
Facilitate the development of a "main street" as part of the urban village concept at Ferrybank-Abbeylands	N	N	P	N	N	Nu
Built Heritage						
Ensure the protection of all structures identified in the Built Heritage Map.	Nu	Nu	Nu	Nu	Nu	Nu
Archaeology						
Preserve and protect the archaeological heritage of the Waterford Environs and safeguard the integrity and setting of recorded sites	Nu	Nu	Nu	Nu	Nu	Nu
Energy						
Establish a Sustainable Energy Zone (SEZ) for undeveloped lands identified at Christendom and Newtown, including lands proposed for redevelopment. All future development in these areas will be required to ensure the supply of 20 per cent heat and electricity from renewable sources over the period of the plan.	N	N	P	Nu	Nu	Nu
Waste Management						
Implement the Joint Waste Management Plan for the South East Region 2006-2011	Nu	Nu	Nu	Nu	Nu	Nu
Implementation						
Prepare a schedule for the implementation of Development Objectives, which will identify each objective, an implementation strategy, primary responsibility (i.e., LA department, private developers, etc.) and proposed timeline.	Nu	Nu	Nu	Nu	Nu	Nu

Option	Positive	Negative	Neutral
1	1	13	8
2	0	15	7
3	12	1	9
4	0	13	9
5	2	11	9
6	6	0	16

Option 3 **The Compact Urban Centre** and option 6 **A series of Neighbourhood Centres** resulted in the most positive outcomes when compared against the Plan Objectives therefore it was felt appropriate to incorporate these two options as the preferred alternative. The compact urban centre and neighbourhood centres will allow for the infilling of appropriately located land adjacent to existing developed areas where services and facilities are either already in place or can be developed in tandem with residential development. Appropriate densities will also be able to be accommodated, which will provide the area with a critical mass from which to provide sustainable transport modes, travel patterns and the sustainable use of land.

5. Full Range of Environmental Effects

With regard to Table 8 *Environmental Matrix*, the following should be carried out:

- Assess each Plan Objective and Policy individually against the SEA Objectives. It is not clear from the Environmental report as to which of the Plans Objectives or Policies is likely to have a significant effect (or not, as the case may be), which makes the development of suitable mitigation and monitoring measures more difficult.

Each Plan policy and objective has been assessed against the SEA objectives and any significant effects or not have been outlined in the comments section of Table 8. (no change to SEA)

- Provide an explanation of the meaning of the scoring marks used in the matrix (i.e. 0, +, x etc.)

An explanatory legend should be used. An explanatory legend is to be included within Table 8 stating:

+ Positive
0 Neutral
X Negative

In addition, the use of a table to present and summarize the assessment of likely significant environmental effects should be considered.

A table summarizing the assessment of likely significant effects has been included within the Non-Technical Summary (Titled Mitigation & Monitoring Measures). This table is to be inserted into Section 10.0 also.

6. Mitigation Measures

Mitigation measures are proposed in the Environmental Report. However, as outlined above, interpretation of Table 8 is difficult, as an explanatory legend has not been provided. A clear link between any significant effects identified in the Matrix (Table 8) and any proposed mitigation measures should be provided. A table similar to that produced in the Non-Technical Summary could be used.

As stated above: An explanatory legend should be used. An explanatory legend is to be included within Table 8 stating:

+ Positive
0 Neutral
X Negative

A table summarizing the assessment of likely significant effects has been included within the Non-Technical Summary (Titled Mitigation & Monitoring Measures). This table is to be inserted into Section 10.0 also and referred to in Section 11.

6.1 Habitats and Biodiversity

Under 'Residential and Mixed Use' (Table 8), it is stated that the Plan will result in loss of habitats and biodiversity. It is also stated that, by of mitigation, development will be supplemented with additional open space and green networks. It is not clear how this will mitigate against habitat and biodiversity loss. The retention and provision of significant amounts of passive open space is to be commended. However, the opening up of natural areas as 'open space' will not of itself lead to protection of biodiversity or compensation for loss elsewhere. It may in fact have a negative impact on biodiversity through increased disturbance etc. The Appropriate Assessment report states that the impact of 'passive open space' represents a potentially major negative threat to important conservation areas. From this it can be inferred that, unless carefully managed, the use of increased 'passive open space' may represent a threat to biodiversity and habitats across the whole Plan area. Clear mitigation and/or compensatory measures should be considered to address this potential effect. The Appropriate Assessment report recommended that rezoning of 'passive open space' be replaced with zoning as 'biodiversity conservation'. However, this has not been clearly reflected as regards a particular Policy or Objective in Chapter 2 of the Plan (*Open Space and Public Amenity*). Neither is this case in Map 8 *Development Objectives* even though such additional zoning has been proposed in the table on *Mitigation and Monitoring Measures* in the Non-Technical Summary.

Map 9 Land Use Zoning Map identifies and zones land for biodiversity conservation. No change to Plan.

You should note that the first Mitigation Proposal in the table on *Mitigation and Monitoring Measures* in the Non-Technical Summary represents more of an environmental Target than a mitigation measure (i.e. no direct loss of habitat...etc). In addition, this Mitigation Proposal refers to an SPA. Should this read SAC? The area could well be an SPA and SAC but this should be clearly set out.

Page 3 Mitigation and Monitoring Measures Table, it is proposed to replace text SPA with text SAC

Mitigation measures should be clearly set out to address all of the ecological impacts listed in Section 7.1.2 (Page 47) of the Environmental Report.

Mitigation measures have been set out to address all of the ecological impacts listed in section 7.1.2 within the Non-Technical Summary (Titled Mitigation & Monitoring Measures). This table is to be inserted into Section 10.0 also and referred to in Section 11.

Many of the mitigation measures proposed for ecology (biodiversity) are derived from the accompanying Appropriate Assessment report. However, the role of the Appropriate Assessment in the overall SEA process has not been clearly set out in the Environmental Report. Are the effects predicted in the Appropriate Assessment also predicted in Table 8 of the Environmental Report? It is not clear.

A paragraph is to be inserted into Section 4.0 setting the that 'An Appropriate Assessment of the Ferrybank-Belview LAP in relation to the Lower River Suir SAC and the Grannyferry NHA has been carried out by Openfield Ecologists. This assessment and any significant impacts, mitigation and monitoring measures have been incorporated into the Environmental Report of this SEA.

6.2 Belview Port

With regard to the proposed development of Belview Port, one of the mitigation proposals states that the relevant LAP Objective (NE7) will require an 'Ecological Impact Assessment' for any future development project in the area. However, LAP Objective NE7 itself sets out a requirement for an 'Environmental Impact Assessment'. Are these assessments the same as each other? In addition, it appears that an EIA has already been carried out for development of the Port. This matter should be clarified.

Overall, where mitigation measures are proposed, confirm that the Plan includes relevant commitments to implement the necessary proposed mitigation measures.

Page 4 Mitigation and Monitoring Measures Table; it is proposed to remove the following text from the table

'It is an objective of the LAP to request at planning application stage an Ecological Impact Assessment for any future built development project that may take place in this area'

7. Monitoring Measures

The Table (*Mitigation and Monitoring Measures*) in the Non-Technical Summary should be reproduced in Section 12.0 *Monitoring*.

The Table (*Mitigation and Monitoring Measures*) in the Non-Technical Summary will be reproduced in Section 12.0 *Monitoring*.