



South Dublin County Council
Development Plan
2016 – 2022

SEA Statement

June 2016



SEA STATEMENT
ON THE
SOUTH DUBLIN COUNTY DEVELOPMENT PLAN
2016-2022

South Dublin County Council
Land Use Planning and Transportation Department
June 2016

TABLE OF CONTENTS

Section 1 Introduction

- 1.1 Purpose of the Report
- 1.2 Legislative Context
- 1.3 Implications of SEA for the Plan-Making Process
- 1.4 Production of SEA

Section 2 How Environmental Considerations were integrated into the Plan

- 2.1 Scoping Report
- 2.2 Environmental Report
 - 2.2.1 Baseline
 - 2.2.2 Mapping of Environmental Sensitivities
 - 2.2.3 Key Environmental Issues Identified
 - 2.2.4 Strategic Environmental Objectives (SEO)
 - 2.2.5 Environmental Assessment
 - 2.2.6 Mitigation

Section 3 Submissions & Observations during Process

- 3.1 Introduction
- 3.2 SEA Scoping Consultations
- 3.3 Submissions and Observations on the Draft Plan and Environmental Report
- 3.4 Submissions and Observations on the Proposed Material Alterations and SEA Addendum II to the Environmental Report

Section 4 Alternatives and the Plan

- 4.1 Alternatives Considered
- 4.2 Assessment of Alternatives
- 4.3 Preferred Alternative
- 4.4 Effects of Alterations on Preferred Alternative

Section 5 Summary of the Influence of the SEA procedure on the Plan

Section 6 Monitoring

- 6.1 Introduction
- 6.2 Indicators and Targets
- 6.3 Reporting
- 6.4 Responsibility

SECTION 1 INTRODUCTION

1.1 Purpose of Report

This is the Strategic Environmental Assessment (SEA) Statement of the South Dublin Development Plan 2016-2022. The main purpose of the SEA Statement is to indicate how environmental considerations, the views of consultees and the recommendations of the Environmental Report have been incorporated in the decision making process in the formulation of the South Dublin Development Plan 2016-2022.

1.2 Legislative Context

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

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

The Directive was introduced into Irish Law in 2004, through the European Communities (Environmental Assessment of Certain Plans & Programmes) Regulations 2004, S.I. No. 435 of 2004 and the Planning and Development (Strategic Environmental Assessment) Regulations 2004, S.I. No. 436 of 2004 (additional supplementary Regulations were introduced in 2011).

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

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

1.3 Implications of SEA for the Plan Making Process

In line with the legislation, the South Dublin Development Plan 2016-2022 was required to undergo Strategic Environmental Assessment (SEA). SEA was undertaken on the Draft Plan in order to comply with the SEA Directive and transposing Regulations – the SEA Environmental Report contains the findings of this assessment. Screening for Appropriate Assessment (AA) was also undertaken on the Draft Plan in order to comply with the Habitats Directive and transposing Regulations. A Strategic Flood Risk Assessment (SFRA) was also undertaken in order to comply with the Flood Risk Management Guidelines.

The Draft Plan and associated documents, including those relating to the SEA, AA and SFRA processes, were placed on public display and submissions were invited. Submissions were responded to in a Chief

Executive's Report. Some submissions resulted in updates being made to SEA, AA and SFRA documentation.

At a Council Meeting on February 4th/5th 2016, the Members of the Council, by Resolution, proposed Material Alterations to the County Development Plan. SEA and AA were undertaken on the Proposed Material Alterations and the findings of these assessments accompanied the Proposed Material Alterations on public display.

At a Council meeting on the 16th May 2016, a number of the Proposed Material Alterations were adopted as part of the final Plan (some with further modifications) and a number of Proposed Material Alterations were not adopted. After the adoption of the Plan, the Environmental Report that was originally placed on public display alongside the Draft Plan was updated in order to take account of both recommendations contained in submissions made during the process and changes to the Draft Plan that were made on foot of submissions. This SEA Statement was also prepared.

1.4 Production of the SEA

The Strategic Environmental Assessment of the Draft South Dublin Development Plan 2016-2022 was undertaken internally in the Council by a separate SEA team who closely liaised with the Development Plan Team.

SECTION 2 HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE PLAN

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

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

2.1 Scoping Report

A detailed Scoping Issues paper was sent to the statutory Environmental Authorities (the Environmental Protection Agency, the Department of the Environment, Community and Local Government and the Department of Communications, Energy and Natural Resources) in February 2015 which noted the environmental issues to be considered, the sources of such information, preliminary environmental objectives and indicators and potential development alternatives. The Environmental Authorities issued detailed responses to the Scoping Issues paper (see Section 3).

The issues that arose generally related to the management and potential effects of the development of the County on Natura 2000 sites and also noted specific species, areas and sites of concern within the County. The submissions also recommended updated sources of information for use in the Environmental Report.

The issues and associated responses were taken into account during the preparation of the Environmental Report and are dealt with in greater detail in Section 3 of this document.

2.2 Environmental Report

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

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

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

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

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

2.2.2 Mapping of Environmental Sensitivities

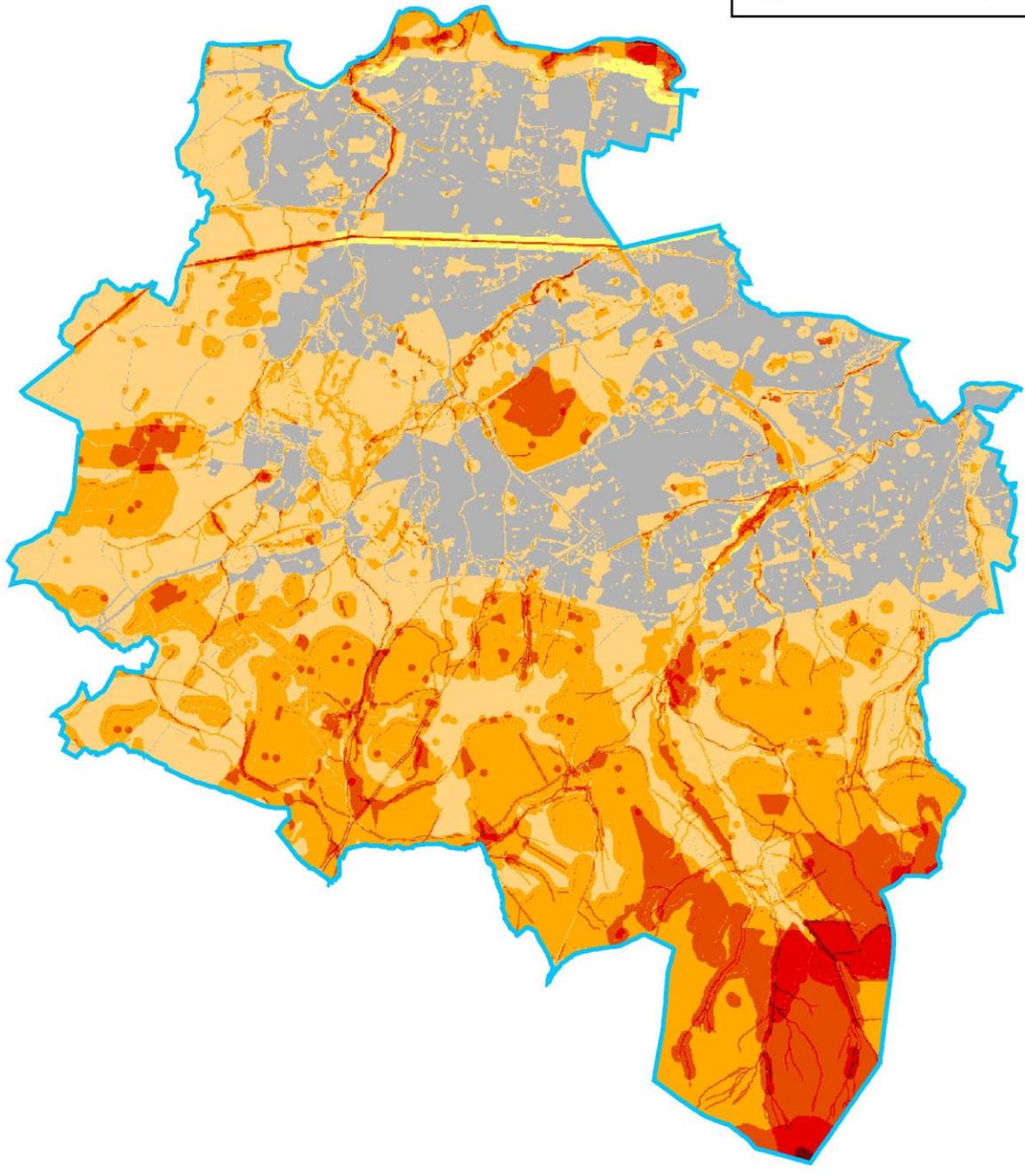
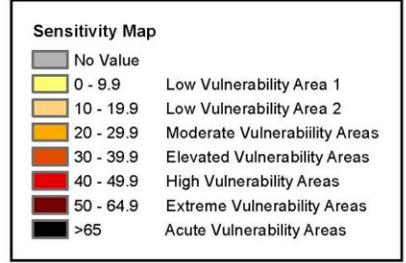
Geographical Information System (GIS) software was used in order to weight a number of environmental sensitivities and map them in layers; this allowed for the identification of concentrated areas of sensitivity within the County. Environmental sensitivities are indicated by colours which range from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

Where the mapping (overleaf) shows a concentration of environmental sensitivities, there is an increased likelihood that development will conflict with these sensitivities and cause environmental deterioration. It is emphasised that the occurrence of environmental sensitivities does not preclude development from

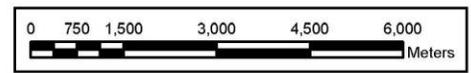
occurring. It alerts at a strategic level that the mitigation measures, which have been integrated into the Plan, will need to be complied with in order to ensure that the implementation of the Plan contributes towards environmental protection.

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

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



The scale above indicates the level of overlap between Environmental Factors which include Ecological Designations (SAC, NHA, SPA), Cultural and Architectural Heritage (RPS, SMR, ACA and Zones of Archaeological Importance), Sites of Geological Importance, Protected Views and Prospects, High Amenity Areas and Open Space Areas, Aquifer Vulnerability, Floodplains, Landfill Sites, Lakes, Waterways and Rural Areas.



2.2.4 Strategic Environmental Objectives (SEO)

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

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

¹ S2, an SEO with an objective to reduce contamination and safeguard quantity and quality of soils was excluded in the 2010-2016 County Development Plan SEA because of the absence of adequate information in the County. There have been no changes to date in this and in the interests of consistency in the SEO's, the numbering of S1 and S3 will be retained

2.2.5 Environmental Assessment

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

Assessment of each Development Plan policy is contained within Appendix 1 of the Environmental Report. This section contains detailed annotations which explain the rationale behind the assessments.

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

2.2.6 Mitigation.

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

Selected Mitigation Measures.

Biodiversity, Flora and Fauna	Strengthens Habitat Directive requirements in relation to Natura 2000 sites and supports their conservation and improvement. Supports designated and non-designated habitats and species. Policy HCL12 Objective 1 and 2, HCL13 Objective 1, 2; HCL15 Objectives1, 2, 3
	Supports the preparation of a County Biodiversity Plan within Development Plan time framework Policy HCL1 Objective 2
	Protection for EU and Nationally "protected species" Policy's G2, HCL7, HCL11, HCL12, HCL13, HCL14
	Provide minimum 10 metre biodiversity protection zone from the bank of watercourses Policy G3 Objective 2
	Hydroelectric developments require assessment indicating the impact of development on freshwater species, bird and mammal species. Policy EC8 Section 10.2.6
	Protect Salmonid water courses, such as the Liffey and Dodder River Catchments which are recognised to be exceptional in supporting salmonid fish species. Policy IE2 Objective 7
	Requires the implementation of River Basin Management Plan <i>Programme of Measures</i> when finalised Section 7.2.0 Policy IE2
	Connect parks and areas of open space with ecological and recreational corridors to aid the movement of biodiversity Policy G4 Objective 2

	<p>Promote and Protect the creation of a Green Infrastructure network throughout the County including the development of a GI Strategy Policy G1 Objectives 1, 2; G2 Objective 1, 2, 3, 4, 5,6, 7,8, 9, 10,11,12, 13</p>
Waste Water	<p>Development under the Plan shall be preceded by sufficient capacity in the public waste water treatment Policy IE1 Objectives 1, 2, 3, 4</p>
Surface Water	<p>Strengthens Flood Risk Directive 2007/60/EC and supports the implementation of the National Guidelines and the County's SFRA Policy IE3 Objective 1, 2, 3, 4</p> <p>All development proposals should provide sustainable drainage measures in compliance with the Greater Strategic Drainage Study (GSDSDS) and Greater Dublin Regional Code of Practice for Drainage Works Chapter 11 Section 11.6.1 Water Management Policy G5</p> <p>To promote and support the retrofitting of Sustainable Urban Drainage Systems (SUDS) in established urban areas, including integrated constructed wetlands. Policy IE2 Objective 6 G5 Objective 1, 2</p> <p>Requires development not to compromise the quality of surface water (and associated habitats and species) and groundwater. Policy IE2 Objective 9, IE2 Objective 5, IE2 Objective 7</p> <p>Protect Surface water quality by assessing the impact of domestic and industrial misconnections, the associated impact on surface water quality and by implementing measures to address same. Policy IE2 Objective 11</p>
Soil and Contamination	<p>Requires appropriate investigations to be carried out into soil and groundwater conditions prior to development work on contaminated sites Policy IE2 Objective 10</p>
Landscape	<p>Restricts Wind Energy Development in rural hinterland and mountain areas to protect the overriding visual and environmental value of these landscapes Policy E9 Objective 1</p> <p>Requires the assessment of developments against the criteria identified in Landscape Character Assessment for South Dublin (2015) and also outlines policy to preserve and enhance the character of the County's Landscape and Views and Prospects Policy HCL7 Objectives 1 and 2, HCL Policy 15 HCL 8 Objective 1; HCL9 Objective 2</p> <p>Development proposals in high amenity zones and sensitive landscapes shall require a Landscape Impact Assessment to be submitted with development proposals Chapter 11, Section 11.5.5 Landscape, Policy E12 Objectives1 and 2</p>

	Provide, support and facilitate provision of high quality and multifunctional public parks and open spaces and to enhance the environmental and ecological function of these areas Policy G4 Objective 1
Transportation and Climatic Factors	Reduces the potential for traffic congestion and vehicular emissions in urban areas through integrated place-making design Policy H7 Objectives 1, 2 Section 6.4.3, Policy TM6 Objectives 1-4 Section 11.2.0, 11.2.1
	Ensures that all transport proposals incorporate appropriate advice and mitigation measures as part of any environmental assessments ² Policy TM3 Objective 6, TM4 Objective 4
	Ensure all medium to large scale residential and commercial developments incorporate energy efficiency and renewable energy measures Policy E3 Objective 1, E4 Objectives 1, 2 Chapter 11 Section 11.7.1, 11.7.2
	Promote development of waste heat recovery and utilisation Policy CE5
	Support implementation of National guidance on Climate Change Policy CS Policy 8

² These mitigation measures were introduced by the SEA team post Environmental Report

SECTION 3: SUBMISSIONS & OBSERVATIONS DURING PROCESS

3.1 Introduction

The following section details the significant issues which were raised prior to, during and after the preparation of the Draft County Development Plan and the accompanying Environmental Report and how these were incorporated into the Plan. The submissions range from the initial scoping responses on environmental issues from the Statutory Authorities (February 2015), submissions on the Draft Plan and Environmental Report (July 2015), as contained in Addendum I of the Environmental Report (December 2015), and submissions on the material alterations to the Draft Plan and assessed environmental effects of the alterations (Addendum II of the Environmental Report February 2016).

3.2 SEA Scoping Consultations

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

- 1 The possible (indirect) environmental impacts on bathing areas, beaches and coastal areas in Dublin Bay by means of environmental vectors (Liffey, Dodder and Grand Canal).
- 2 The prevention of flooding and the need for riparian zones alongside rivers and streams.
- 3 That the Appropriate Assessment procedure has a separate legislative process from the Strategic Environmental Assessment process and that this should be dealt with separately from the Environmental Report.
- 4 The protection of the High Amenity Areas and views particularly in the sensitive upland areas where housing is occurring.

3.3 Submissions and Observations on the Draft Plan and Environmental Report

The written submissions received from the Environmental Authorities and the Non Statutory Submissions following the public display period (July 13th to 24th September 2015) of the Draft Development Plan 2016-2022 (and accompanying Environmental Report and Appropriate Assessment Screening) and the responses are summarised below. The full [Response to Submissions Report](#) is available in the Chief Executives Report (December 2015).

Submission Summary	Comment
<p>Department of Communications, Energy and Natural Resources</p> <p>Reference to all geological sites identified in the Geological Heritage Audit should be included in the Plan</p> <p>Amend ET8 Objective 2 or insert new policy to provide for the protection and promotion of the County's geological heritage.</p> <p>Include reference under 11.3.8 (Extractive Industries) to GSI – ICF Guidelines and require consultation with the Geological Survey of Ireland regarding restoration plans for quarries.</p> <p>Include action that requires the retention of new rock exposures of geological interest that are exposed during the construction of new roads or carriageways</p>	<p>The submission resulted in Table 9.7 of the Plan being amended to include all 10 Geological Sites. Additional text was also added to Section 9.7.0 explaining the importance of the sites.</p> <p>The submission resulted in an amendment to ET Objective 2 to include reference to the County's geological heritage.</p> <p>Submission resulted in an amendment to Section 11.3.8 of Chapter 11 to include reference to the GSI guidelines.</p> <p>Submission resulted in the NRAs guidance document on road schemes being referenced in Chapter 11 Implementation.</p>
<p>Environmental Protection Agency</p> <p>Include a Policy/Objective to manage and mitigate against invasive species/noxious weeds</p> <p>Integrate the County Biodiversity Plan and Green Infrastructure Strategy, upon their adoption, into lower level plans</p> <p>Advised that relevant environmental summary maps and tables as appropriate should be included in the Non-Technical Summary of the SEA Environmental Report. A More detailed overview of the SFRA findings should also be included.</p>	<p>The submission resulted in additional objectives being added to Chapter 8 (G2 Objective 12 and 13) to include a programme to monitor and restrict the spread of invasive species</p> <p>The submission resulted in an additional wording being added to the action associated with G Policy 1 (Chapter 8).</p> <p>This submission resulted in the inclusion of the Environmental Sensitivity Map (Fig 3.18) to the NTS and Section 3.7.8.2 was expanded to provide a more detailed summary of the SFRA</p>

Recommended a commitment to reviewing the effectiveness of environmental monitoring/mitigation measures during the Plan.

Submission resulted in additional text added to Section 9.6 of the Environmental Report outlining South Dublin County Councils responsibility in relation to monitoring.

Department of the Arts, Heritage and the Gaeltacht.

Advises that the placing of new infrastructure in green areas can impact negatively on biodiversity and care should be taken to ensure that green infrastructure is not interpreted as adding infrastructure to green areas.

This submission resulted in the inclusive of an objective (**G Policy 2 Objective 11**) outlining the incorporation of appropriate elements of GI into existing areas.

Advises that a number of road and bridge proposals are likely to impact on NHAs, pNHAs and on biodiversity (e.g. proposed bridges over Dodder and long term road proposal to the west)

This submission resulted in the addition of an objective (**TM Policy 4 Objective 4**) to ensure that road proposals have regard to pertaining environmental conditions as part of their environmental assessment. This submission also resulted in the removal of the proposed bridges over the Dodder from the Road Proposals (Chapter 6).

Advised Policy HCL9 Objective 3 in relation to the Dublin Mountains should be amended where it refers to the expansion of the National Park in the interests of clarity

This submission resulted in amendments to **HCL9 Objective 3** which stated that development within the Dublin Mountains would not prejudice the future expansion and development of a National Park.

Advised that the SEO, indicators and targets for biodiversity flora and fauna to clarify the word 'relevant'.

This submission resulted in an amendment to the SEOs, indicators and targets outlined in the Environmental Report; the word "relevant" was omitted from SEOB1 to avoid any confusion over same.

Concern expressed regarding mitigation measures incorporated into the Draft Plan in relation to the impact on habitat connectivity, landscape and biodiversity from pedestrian and cycleways.

Submission resulted in the addition of a new objective (**TM Policy 3 Objective 6**), ensuring that all walking and cycling routes have regard to pertaining environmental conditions and incorporate appropriate avoidance and mitigation measures as part of their environmental assessments.

<p>Concerns expressed in relation to Appropriate Assessment Screening report and its omission of reference to the proposed water abstraction from the River Shannon.</p> <p>Noted in the submission that more detailed conservation objectives are available for the North and South Dublin Bay SACs and the AA Screening Report should reflect this.</p>	<p>This submission resulted in the AA Screening Report being amended to include reference to the Eastern and Midlands Regional Water Supply Project and the implications for same.</p> <p>Submission resulted in Sections 3.2 of the AA Screening Report being updated to include the detailed conservation objectives as requested.</p>
<p>Department of the Environment, Heritage and Local Government</p> <p>Submission notes proposals for Level 3 District Centre's at Firhouse, Knocklyon and Palmerstown and outlines that this would be contrary to the Retail Strategy for the GDA 2008-2016.</p> <p>Submission notes that the Draft Plan is accompanied by a SFRA (Stage 1 Flood Risk Identification Report). In line with National Guidelines, a Stage 2 report is required to inform proposed zoning.</p>	<p>Submission resulted in the retail status of these 3 areas being reverted back to Level 4 centres, in line with the Retail Strategy.</p> <p>Submission resulted in the Initial SFRA being amended to inform the preparation of the Draft Plan and to produce a finalised Strategic Flood Risk Assessment.</p>

SEA Specific Issues Raised in Non-Statutory Submissions

<p>Submission No. DRAFTDEVPLAN0335</p> <p>Include objective to co-operate with adjoining local authorities in the preparation of an Environmental Management Plan for the River Dodder and Environs.</p>	<p>Submission resulted in an Action being included under IE Policy 2 (Chapter 7 Section 7.2.0) outlining the Councils co-operation with adjoining local authorities in the preparation of a management plan.</p>
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4.4 Submissions and Observations on the Proposed Material Alterations and SEA Addendum II to the Environmental Report.

The environmental assessments of the proposed Material Alterations to the Draft Development Plan were on public display from 25th February 2016 to 29th March 2016. The following table summarises the submissions and observations on the proposed Material Alterations to the Draft Development Plan and the SEA assessment of these alterations. The full response to these submissions is available [here](#).

Submission Summary	Comment
<p>Environmental Protection Agency</p> <p>Submission objected to the inclusion of H8 SLO3 on lands at Monastery Road which sought to provide a reduced density on brownfield lands as it would be at variance with the Draft Plans Core Strategy and national guidelines on sustainable development.</p> <p>With regard to ET3 SLO1, the EPA noted the assessment findings that '...the development type in the business park is not compatible with town centres or brownfield sites, due to the demand for land...' and in particular, note the issues relating to poor public transport provision and the potential for significant negative effects on biodiversity features such as treelines, hedgerows, ecological corridors and landscape character. In preparing a long-term plan for the expansion of the Grange Castle Economic and Enterprise Zone, the requirements of the SEA, Habitats, Floods and Water Framework Directives should be integrated, as appropriate. The Plan should provide for the protection and incorporation of existing green infrastructure in seeking to further develop this area.</p>	<p>The proposed Material Alteration would have the potential to conflict with the area of geological interest located on the site, however, such conflicts would be likely to be mitigated by the measures integrated into the Draft Plan, including those which arose as a result of the SEA process. Reduction in densities in an established residential area, may indirectly put pressure on development elsewhere in the County, thereby potentially negative impact on biodiversity networks, landscape and water.</p> <p><i>Outcome: It was recommended in the Chief Executives Report (April 2016) for the proposed SLO to be omitted. This recommendation was adopted into the final Plan (i.e. the SLO was omitted).</i></p> <p>As detailed in the Environmental Report Addendum II, there are serious concerns about the environmental effects of this SLO in seeking to zone lands south of the Grand Canal. While it is noted that any proposal to zone these lands for employment uses (following adoption of the Plan) would be subject to SEA and AA screening, the principle of developing greenfield sites for employment uses would be contrary to the SEA Development scenario which seeks to consolidate brownfield development.</p> <p>Recommendation: Having regard to the assessment detailed in the Environmental Report and Addendum II Report, Material Alteration Ref. Chapter 4-No.3 should be omitted in order to prevent significant residual negative impacts.</p> <p><i>Outcome: ET3 SLO1 was adopted into the final Plan.</i></p>

Submission from the EPA welcomes intention to cooperate with Dublin City Council and Dun Laoghaire Rathdown County Council in preparing an environmental management plan for the River Dodder and its environs but notes that the timeframe for preparation and adoption of this plan should be clarified, where possible, and notes that this plan should also seek to incorporate the second cycle of River Basin Management Plans currently being prepared, upon adoption.

Submission from the EPA in relation to the regeneration and redevelopment of the site of the former Tara Co-Op, the EPA note that a commitment should be incorporated to establish an environmental management plan in order to retain the green belt character of the site and respect the local landscape character.

Department of Arts, Heritage and the Gaeltacht

The Department of Arts, Heritage and the Gaeltacht welcomes the inclusion of TM3 Objective 6, which seeks to ensure that walking and cycling routes have regard to environmental conditions and sensitivities and incorporate appropriate avoidance and mitigation measures.

The Department of Arts, Heritage and the Gaeltacht welcomes the removal of two new bridges across the River Dodder.

The incorporation of an Action into IE Policy 2 regarding the preparation of an Environmental Management Plan for the River Dodder and its environs would have positive results in the protection of biodiversity and protected species for the River Dodder.

Outcome: IE Policy 2 Action was adopted into the Final Plan.

A set timeline to carry out the management plan could not be incorporated into the Action as consultation with the other Local Authorities is required as well as an allocation of resources.

Any development of these should respect the character of the local landscape and site feature.

Outcome: HCL10 SLO 1 in relation to the Tara Co-Op was adopted into the Final Plan with amended wording ensuring development is subject to an environmental management plan.

The Proposed Material Alteration would provide protection and minimise impacts on habitats, biodiversity, landscape and waterbodies.

Outcome: TM Policy 3 Objective 6 was adopted into the Final Plan.

As detailed in the Environmental Report and the Addendum Report II, the inclusion of the bridges has the potential to impact significantly on the Dodder Valley landscape and on the river, associated riparian zones and the biodiversity value of the Dodder River habitats. Deleting the bridges is considered the most appropriate option.

Outcome: The proposed bridges were omitted from

Minister Frances Fitzgerald, TD

Submission requested the retention of the EE zoning and the SLO in the Draft Plan for the lands at Moneenalion Commons

the Final Plan

It has been continually noted throughout the environmental assessment that the retention of an Employment zoning on these lands would have significant negative environmental impacts on biodiversity, landscape, rivers and transport. Rezoning the lands for development purposes has been assessed as having a most detrimental effect on the receiving environment and the Development Strategy of the Draft County Development Plan. Furthermore it was noted that the SLO requiring a Flood Risk Mitigation Strategy to be carried out with any development proposals on the site does not allow for the cumulative impact of development on the flood zone to be assessed and may result in works being required outside of an applicant's control. Furthermore, the requirement for heavy engineering works to be carried out as mitigation measures would have a negative impact on biodiversity, rivers, groundwater, and landscape and on the overall County GI network.

Outcome: The lands at Moneenalion Commons were zoned for Employment purposes, following a vote by the Elected Members and therefore subsequently adopted into the Final Plan with an accompanying SLO requiring a site and catchment specific FRA and Mitigation Strategy to be submitted with any development proposal.

Submissions on the proposed Material Alterations and Addendum II of the Environmental Report (noted above) were assessed for environmental consequences and provided to the Elected Members in mid May 2016 along with the Chief Executives Report on submissions received.

After the adoption of the Plan in May 2016, the Environmental Report that was originally placed on public display alongside the Draft Plan was updated in order to take account of both recommendations contained in submissions made during the process and changes to the Draft Plan that were made on foot of submissions and motions. This SEA Statement was also prepared.

The Elected Members have taken into account the findings of all relevant SEA output during their consideration of the Draft Plan and before its adoption.

SECTION 4 ALTERNATIVES AND THE PLAN

4.1 Alternatives

An evaluation of the likely environmental consequences of a range of alternative strategies for accommodating future development in the South Dublin area was part of the SEA process. The scenarios were derived taking into account higher level strategic plans as well as the geographical scope of the area. The Regional Planning Guidelines for the Greater Dublin Area 2010-2022 (RPG-GDA) provide an overall strategic settlement context for the Development Plans of each local authority in the GDA. The alternative scenarios considered were:-

Option 1: Environmental/Preservation Approach:

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

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

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

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

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

4.2 Assessment of Alternatives

Evaluation using the SEOs

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

	Likely to Improve status of SEOs	Probable Conflict with status of SEOs unlikely to be mitigated	Potential Conflict with status of SEOs- likely to be mitigated	Uncertain Interaction with status of SEOs	Neutral Interaction with status of SEOs	No Likely interaction with status of SEOs
Alternative Scenario 1 Environmental/ Preservation	B1 B2 B3 W1 W2 W3 CH1 CH2 M1 M2 L1 HH1	C1 C2 HH1	B1 B2 B3 L1 CH1 CH2 W1 W2 W3 M1M2 (Blue indicates indirect impact)			
Alternative Scenario 2 Sustainable /Selective Concentrations	B1 B2 HH1 S1 S3 W1 W2 C1 C2 M1 M2 L1		B3 W3 CH1 CH2			
Alternative Scenario 3 Weak Planning/Market Led Approach		B2 B3 HH1 S1 W1 W2 W3 C1 C2 M1 M2 CH1 CH2 L1				

Synopsis of SEOs.

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

Scenario 1, (the environmental / preservation) does give rise to a high level of direct, short-term beneficial environmental effects (although also results in significant negative direct and indirect impacts). In the medium to long-term Scenario 2 is more likely to bring about better environmental outcomes because of its ability to bring about both controlled growth and the necessary growth to capitalise important

environmental mitigation measures. Scenario 3 which includes the accommodation of major development on Greenfield land at the edge of the present conurbation, would result in a range of significant environmental conflicts which cannot be fully mitigated.

4.3 Reasons for choosing the Preferred Alternative

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

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

4.4 Effects of Amendments on Preferred Alternative

The amendments to the Draft Plan by the Elected Members prior to public display in July 2015 and the amendments to the Draft Plan by the Elected Members in February and May 2016 did result in changes to the policies and land uses proposed within the Development Plan. It was considered that some of these changes would result in significant deviation from the preferred alternative.

On the positive side, a new High Amenity zoning was introduced for three main areas, Dodder Valley, Liffey Valley and Dublin Mountains. The zoning will restrict the land uses permitted and open for consideration in the Dodder Valley, Liffey Valley, Dublin Mountains, thereby resulting in greater protection for this sensitive resource. The new zoning also correlates with the findings of the Landscape Character Assessment for the County which identified landscapes of high amenity value and outlined means by which they could be protected.

Furthermore, the proposed bridges across the River Dodder at two different locations had the potential to impact significantly on the Dodder Valley landscape and on the river, associated riparian zones and the biodiversity value of the Dodder River habitats. Prior to the adoption of the Plan in May 2016, this proposal was removed, which was the most appropriate action in order to safeguard the landscape and biodiversity of the Dodder Valley.

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

The amendments that are likely to result in significant residual negative impacts include the rezoning of lands along the northern side of the N7 Naas Road between Baldonnell Business Park and Casement

Aerodrome. The rezoning of large additional areas of agricultural land for industrial purposes would undermine the development strategy outlined in the Environmental Report, and would facilitate the sprawl of industrial development in numerous locations in the County, rather than in certain appropriate areas. This would have direct negative consequences for Biodiversity (river and hedge systems)/Transport (no high quality public transport nearby)/Heritage/Landscape (Visual Sprawl in a rural area)/River Flooding (Camac) in the zoned area, as well as indirectly having negative effects on the sustainable reuse of brownfield sites.

The introduction of a Specific Local Objective (ET3 SLO1) to facilitate a review of the zoning of lands south of the Grand Canal and west/north of the R120 with a view to prepare for the long term expansion of Grange Castle Economic and Enterprise Zone, would be contrary to the selected development scenario, which seeks to consolidate brownfield development. Further intensifying this area by extending development into rural lands could have significant effects on river systems and biodiversity corridors, the landscape, and increase car based movements. Furthermore, the development of large areas of rural lands to the west of the County could have significant impact on the Green Infrastructure network for the County. This area, as part of the Newcastle Lowlands Landscape Character Area, has been identified in the LCA as of a medium to high landscape value. The potential to establish a linear park to enhance Green Infrastructure has been identified for this area and the potential zoning of additional employment lands in this area would have serious negative impacts.

The zoning of additional Greenfield Land at Tootenhill, Rathcoole to facilitate residential development in an area served by infrequent public transport, would result in significant negative impacts. Development would negatively impact on the flood plain of a tributary of the Griffeen River, associated biodiversity corridor and the rural landscape, would generate sprawl and would increase car travel and car dependency due to the extension of the western edge of Rathcoole. Furthermore the development of this area would be contrary to the preferred scenario (and the Core Strategy) which seeks to consolidate development within the County and locate development in proximate to well serviced public transport links.

The result of these amendments being incorporated into the Development Plan have decreased the extent of the Plan following the preferred Scenario 2 (Sustainable/Selective Concentrations), and increased elements of Scenario 3 (Weak Planning/Market Led Approach).

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

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

SECTION 6 MONITORING

6.1 Introduction

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

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

6.2 Indicators and Targets

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

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

SEO	Indicators	Information Sources
B1:	Percentage of relevant habitats and designated ecological sites lost	SDCC
B2:	No. of significant adverse impacts to relevant habitats, geological features, species or their sustaining resources in designated ecological sites	SDCC
B3:	Area of Biodiversity Network (County's primary ecological corridors) which has been lost without mitigation	SDCC
HH1	Indicator HH1: No of occasions that PM10 limits have been exceeded in at Air Monitoring stations Indicator HH2: Percentage of population that are exposed to unacceptable ³ levels of traffic noise	EPA Dublin Agglomeration Local Councils

³ As defined by the Dublin Agglomeration Noise Action Plan 2013-2018

S1:	S1i: Area of brownfield land redeveloped	SDCC
	S1ii: Area of greenfield land developed	SDCC
	S1iii: Number of contaminated sites identified and remediated	SDCC
S3:	S3: Volume of waste recycled and volume of waste sent to landfill	SDCC
W1	Indicator W1i: Biotic Quality Rating (Q Value) and risk assessment Indicator W1ii: EPA Trophic Status of Lakes	EPA, Eastern River Basin District Reports
W2	Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	As above
W3	Number of developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk	SDCC
C1	C1i: Percentage of population within the County traveling to work or school by public transport or non-mechanical means	Census information
	C1ii: Average distance traveled to work or school by the population of the County	As above
C2:	Extent of developments built within areas served by high quality public transport	SDCC
M1:	Number of new developments granted permission which cannot be adequately served by a public waste water treatment	SDCC
M2	Drinking water quality standards, (Microbiological, Chemical and Indicator parameters)	EPA
CH1	Number of unauthorised developments occurring which result in full or partial loss to entries to the Record of Monuments and Places - including Zones of Archaeological Potential	SDCC
CH2	CH2i: Number of unauthorised developments occurring which result in physical loss or loss entries to the Record of Protected Structures	SDCC
	CH2ii: Number of additions to the Record of Protected Structures and the number of additional ACAs	SDCC
L1:	L1i: Number of developments permitted in the Mountain, High Amenity, Liffey Valley and Rural zones	SDCC
	L1ii: Percentage of developments permitted in the Mountain, High Amenity, Liffey Valley and Rural zones that have carried out landscaping	SDCC

6.3 Reporting

A monitoring report, evaluating the effects of implementing the County Development Plan will be prepared at the same time as the Chief Executive's Report to the Elected Members on the progress achieved in securing County Development Plan objectives. Section 15 of the Planning and Development Act 2000 (as amended) states that this report is required within two years of the making of the Plan. It is the intention of the Council that an SEA Monitoring Report will be prepared at two yearly intervals.

6.4 Responsibility

South Dublin County Council are responsible for the implementation of the SEA Monitoring Programme including

- Linking SEA monitoring output with the mid-term review of the Development Plan;
- Monitoring specific indicators and identifying any significant effects, including cumulative effects;
- Reviewing the effectiveness of monitoring/mitigation measures during the lifetime of the Plan; and
- Identifying any cumulative effects