

# **SEA STATEMENT**

**ON THE**

## **FORTUNESTOWN LOCAL AREA PLAN 2012**



**South Dublin County Council**  
**July 2012**



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## **SECTION 1 INTRODUCTION**

### **1.1 Purpose of Report**

This is the Strategic Environmental Assessment (SEA) Statement of the Fortunestown Local Area Plan (LAP) 2012. 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 LAP.

### **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 on the Draft Plan and Environmental Report, and
  - any transboundary consultations

have 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**

While the requirement for a mandatory Strategic Environmental Assessment for Local Area Plans applies only to areas in which the population is in excess of 5,000 persons, South Dublin County Council was of the opinion that development in the Fortunestown LAP area was likely to potentially have significant effects on the environment and an Environmental Report was prepared in parallel with the production of the Draft LAP and was submitted to the Elected Members alongside the Draft Plan. The purpose of the report was to provide an understanding of the likely environmental consequences of various alternative scenarios and of the policies and objectives contained within the LAP.

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

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

The Strategic Environmental Assessment of the Fortunestown Local Area Plan 2012 was undertaken internally in the Council by a separate SEA team who closely liaised with the LAP Team.

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

Environmental considerations were integrated into the LAP 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 LAP area were communicated to the Plan-preparation team on a regular basis from the outset of the Plan preparation process. This process helped identify those areas with the most limited carrying capacity and helped ensure that either future growth was diverted away from these areas or that appropriate mitigation measures were integrated into the Plan.

The Local Area Plan was also subject to Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) at both the draft and amendment stage.

### **2.1 Scoping Report**

An SEA Scoping Issues Paper was sent to the designated Environmental Authorities on 24th March 2011. The Paper set out a description of the Fortunestown LAP area and a baseline of environmental data (grouped under the environmental themes/receptors – biodiversity, flora and fauna, population and human health, soil and landscape, water, air, climate, material assets and cultural heritage including architectural and archaeological). Submissions were received from the Environmental Protection Agency (EPA) and the Department of Environment, Community and Local Government (DOECLG).

The most important strategic environmental issues in the Fortunestown LAP area arising from the scoping exercise and from the consultations were identified as the incorporation of the following:

- The inclusion of the Biodiversity Network provisions of the Habitats Directive (92/43/EEC) which seeks to promote the maintenance and conservation of biodiversity, and in particular "*Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species*" (Article 10, Habitats Directive).
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### **2.2 Environmental Report**

The Environmental Report was prepared alongside the LAP and investigated, described and evaluated the effects of implementing the LAP on the receiving environment. The report also assesses and identifies development alternatives for the LAP area, and identifies the most sustainable development strategy.

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

- 1 It raised the awareness of the existing level of environmental information in the LAP area and also the EU and National legislation governing the environment
- 2 It facilitated the introduction of the concept of Green Infrastructure into the LAP
- 3 It emphasised the necessity of maintaining the three streams that flow through the LAP lands as open streams maintaining adjoining Hedgerows some of which had historic importance (townland, parish and barony boundaries)
- 4 It provided a transparent assessment of each proposed policy and objective which allowed further fine-tuning to reduce negative environmental impacts

The detail of these influences is expanded on below.

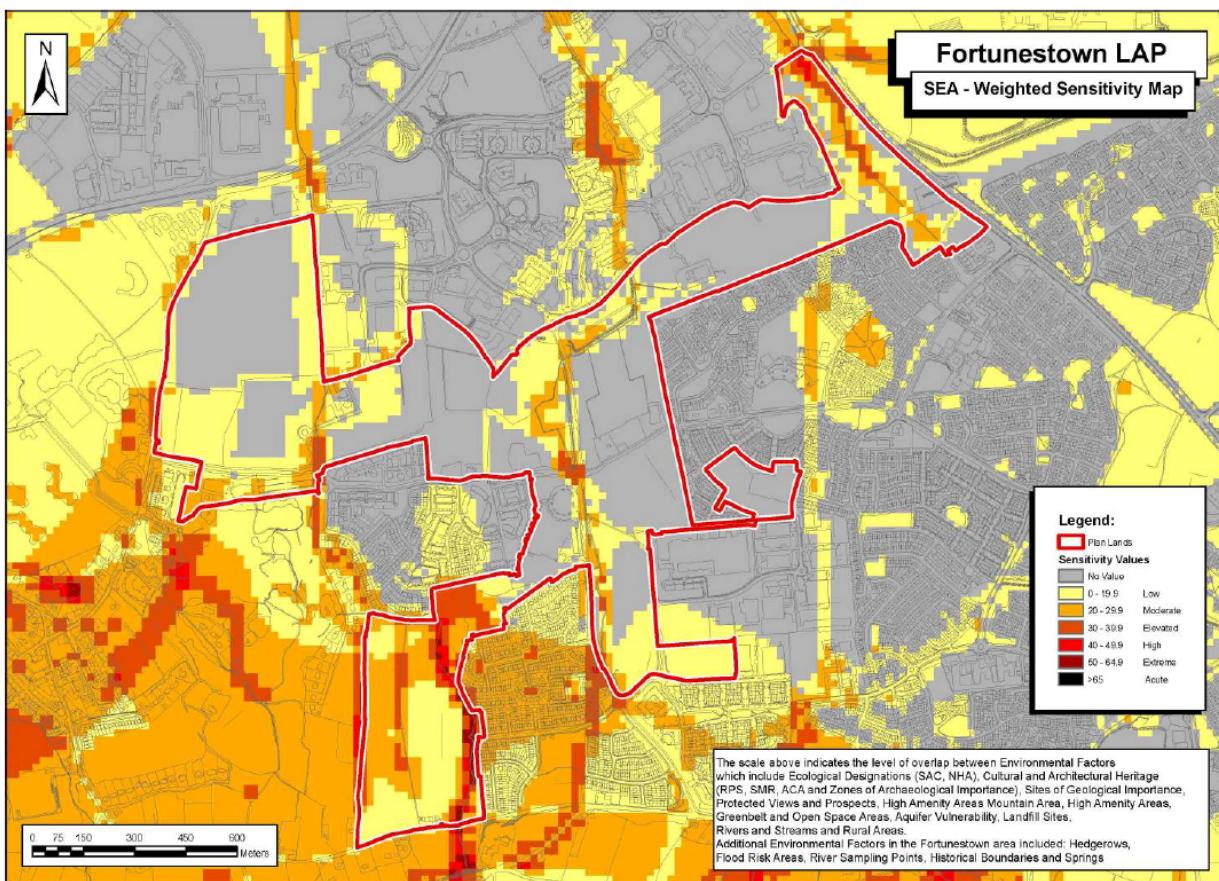
**2.2.1 Baseline:** The Environmental Report contains a range of baseline information in the Fortunestown LAP area on key environmental headings such as

- 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 area. Environmental sensitivities are indicated by colours which range from extreme vulnerability (red) to high vulnerability (orange) to moderate vulnerability (yellow) and low vulnerability (grey).

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



Mapping of Environmental Sensitivities

**2.2.3 Key Environmental Issues Identified:** The key environmental issues in the Fortunestown LAP area were identified in the Environmental Report as

- Need to maintain the Biodiversity Network, in particular along historic hedgerows and streams and the need to comply with the Habitats Directive
- Significant habitat fragmentation has already occurred in the northern LAP land area due to Hedge removal and excessive lopping
- Compliance with the Water Framework Directive and the Groundwater Directive. There is an area of high groundwater vulnerability located in the north-eastern portion of the LAP lands adjoining the Roadstone Quarry at Cheeverstown
- The need to prioritise development where alternative modes of public transport are available or planned and the need to reduce private car based movements resulting in reduced emissions
- Make provision for improved cycle and walking routes within the LAP land
- In terms of climate change, prioritising the development of LAP areas adjoining the City West Luas, the use of the Sequential Test and the Justification Test for any areas prone to flooding and the use of Sustainable Urban Drainage Systems (SUDS) in the LAP lands as primary strategies in the plan

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

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

Some, though not all, of the information gaps caused by the absence of a Biodiversity Plan and a detailed Landscape Character Assessment will be addressed under the auspices of the Heritage Plan 2010 - 2015. Detailed predictive information concerning floodplains for the Fortunestown LAP area will only become available following the completion of Catchment Flood Risk Assessment Management Studies (CFRAMS) for the River Liffey in 2015.

#### **2.2.4 Strategic Environmental Objectives (SEO)**

The SEOs are measures against which the environmental effects of the Fortunestown Local Area Plan 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 LAP. The SEOs are linked to indicators and targets which facilitate monitoring of the implementation of both the LAP and the County Development Plan (the SEA Monitoring System initiated by the Council following the adoption of the County Development Plan is also suitable for use at the LAP level) and are as follows;

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

## 2.2.5 Environmental Assessment:

The policies and objectives of the LAP 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. Local Area 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 Local Area Plan policy is contained within the Environmental Report (August 2011).

The policies and objectives proposed by the elected members after the Draft Plan went on public display (25th August – 6th October 2011) were also assessed and incorporated into the amended plan which went

on further display from 10th January 2012 and 6th February 2012.

## **2.2.6 Mitigation.**

The introduction of the concept of Green Infrastructure to the Fortunestown LAP at the draft stage ensured the conservation and enhancement of biodiversity, the provision of accessible parks, open spaces and recreational facilities, the sustainable management of water, the maintenance of landscape character and the protection and enhancement of the architectural and archaeological heritage.

A series of mitigation measures were recommended in the Environmental Report for integration into the Local Area Plan and these are listed below. These have been included within the Plan as new policies or amendments to policies unless otherwise indicated.

### **Selected Mitigation Measures.**

<b>Biodiversity</b>	Create an integrated network of wildlife and green corridors through the Plan Lands by way of linking, preserving and incorporating existing hedgerows (especially those at Boherboy and Cheeverstown), biodiversity corridors and existing streams with a necklace of parks in a manner that forms a link between the Plan Lands and the Dublin Mountains. ( <b>Objective GI1</b> )
	All development proposals maximise the opportunities for enhancement of existing ecology and biodiversity and are accompanied by a full ecological assessment, carried out by a suitably qualified professional, that includes measures to enhance ecology and biodiversity and avoid or minimise loss to local ecology and biodiversity. ( <b>Objective GI3</b> )
<b>Water and Water Management</b>	It is therefore an objective of the proposed Local Area Plan that a 10-15 metre (min) corridor (measured from the top of the bank) shall be maintained either side of the sections of watercourse that are designated for preservation under the proposed Local Area Plan. These corridors shall protect, improve and enhance the natural character of the streams and accommodate pedestrian and cycle corridors. Culverting of sections of watercourses that are designated for preservation will not be permitted ( <b>Objective GI4</b> ). This mitigation measure was subsequently amended.
	It is therefore an objective of the proposed Local Area Plan that the use of SUDS is a requirement for all new developments in order to reduce surface water runoff and to minimise the risk of flooding of the Plan Lands and surrounding lands. Existing springs will be protected and maintained and incorporated into SuDs ( <b>Objective GI5</b> ).
<b>Landscape</b>	Development across the Boherboy Neighbourhood shall protect and incorporate its existing rolling topography and its existing hedgerows and streams especially the watercourse and hedgerow that demarcates the old townland boundary between Boherboy and Gibbons. ( <b>Objective BN6</b> )  The slope of the neighbourhood's topography shall be utilised as part of any development and the level of cut and fill shall be kept to an absolute minimum. This shall be demonstrated under all planning applications with extensive north-south and east-west sections. Retaining walls shall not be permitted. ( <b>Objective BN7</b> )

<b>Transportation and Climatic Factors</b>	Assess all interfaces between proposed new development, existing housing development and undeveloped lands at planning application stage and to ensure that all proposed development integrates and addresses existing development and undeveloped land especially residential development and open spaces in a manner that creates the opportunity for more permeable layouts and encourages passive and active surveillance of streets and spaces. ( <b>Objective AM14</b> )
	Create open ended routes through existing and new development in a manner that ensures greater permeability and convenient pedestrian access to community facilities, schools, open spaces, shopping facilities, local employment and public transport stops. ( <b>Objective AM15</b> )
	Development of the Cheeverstown Neighbourhood will include for the provision of a direct pedestrian and cyclist link to each of the Ard Mor and Brookview housing estates through the northern boundaries of these estates in a manner that provides safe and direct access to the Luas. The eastern link at Brookfield will be via undeveloped Council owned land. The western link will be from the Ard Mor estate close to the Citywest Campus Luas stop ( <b>Objective CCN1</b> ).
<b>Noise</b>	There is a need to ensure that future developments are designed and constructed in such a way as to minimise noise disturbances from the N7, N82 and Outer Ring traffic arteries. Softer methods of reducing the impact of traffic noise on residential amenity shall be implemented rather than measures that detract from the quality of streetscapes such as noise barriers and wide building setbacks. Section 7.2.4 of the proposed Local Area Plan details measures that can be implemented to achieve these aims.
<b>Architectural Heritage</b>	To ensure that development within the vicinity of Saggart House (House and Gateway) and Tassagart (Tower House, Walled Stable Yard, Outbuildings and Gateways) does not seriously detract from the setting of these structures, and is sited and designed appropriately ( <b>Objective CCSN 7</b> )
	The layout of streets in the southern section of the Boherboy Neighbourhood will be orientated to create vistas of the Church Tower in Saggart Village to the north-west and the Dublin Mountains to the south. Development of the Boherboy Neighbourhood shall also incorporate and retain Corbally Bridge ( <b>Objective BN8</b> )

## **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 Fortunestown Local Area 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 (April 2011), submissions on the Draft Plan and SEA Addendum I to the Environmental Report (October 2011) and submissions on the amendments to the Draft Plan and assessed environmental effects of the amendments (SEA Addendum II to the Environmental Report March 2012).

### **3.2 SEA Scoping Consultations**

An SEA Scoping Issues Paper was sent to the designated Environmental Authorities on 24th March 2011. The responses to the issues paper were taken into account during the carrying out of the Strategic Environmental Assessment. The most significant issue/point raised was that from the EPA to ensure:-

- The inclusion of the Biodiversity Network provisions of the Habitats Directive (92/43/EEC) which seeks to promote the maintenance and conservation of biodiversity, and in particular "*Such features are those which, by virtue of their linear and continuous structure (such as rivers with their banks or the traditional systems for marking field boundaries) or their function as stepping stones (such as ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species*" (Article 10, Habitats Directive).

This issue was incorporated into the approach of both the SEA team and the LAP team by means of introducing the "Green Infrastructure" concept.

### **3.3 Submissions and Observations on the Draft Plan and SEA Addendum I to the Environmental Report.**

The written submissions received from the Environmental Authorities and the Non Statutory Submissions following the public display period (25<sup>th</sup> August – 6<sup>th</sup> October 2011) of the Draft Fortunestown Local Area Plan (and accompanying Environmental Report and Appropriate Assessment Screening) and the responses are summarised below. The full Response to Submissions Report (Nov 2011) is available.

<b>Submission Summary</b>	<b>Response</b>
<b>DoECLG</b> The draft LAP should set out how the proposed population figure fits into the overall population allocation from the Regional Planning Guidelines and County Development Plan	The submission resulted in amendment to include clarification that the population figures proposed were in accordance with the the Regional Planning Guidelines for the Greater Dublin area 2010 – 2022
<b>Environmental Protection Agency</b> Consideration should be given to reviewing existing zoned lands to identify potentially inappropriate zoned lands, in the context of flood risk potential, and amending as appropriate.	The strategy and vision of the LAP has taken these issues into consideration. Section 5.1. identifies the principle of Green Infrastructure throughout the plan. Potential flood risk areas have been identified as green spaces and large biodiversity corridors with setbacks from streams have been provided.  The recommendations and suggested policies from

<p>Include reference to the requirements of the Groundwater Directive (2006/118/EC), the new Birds and Habitats Regulations (S.I. No. 477 of 2011) and provide clarification on the definitions for categorizing hedgerows and to the meaning of "relevant habitats".</p> <p>It was suggested that the Sensitivity Map required clarification on the underlying methodology and that it should be included in the Non Technical Summary (NTS).</p>	<p>the Initial Strategic Flood Risk Assessment had been integrated into the Fortunestown LAP but the summary information on the potential Flood Risk Areas or their extent had not been included within the LAP. Therefore it was recommended that the LAP be amended to include this information and the map of potential Flood Risk Areas within the plan lands.</p> <p>All of the issues were subsequently referenced. The hedgerows had been evaluated according to ecological criteria set out in the National Roads Authority's Guidelines for Assessment of Ecological Impacts of National Road Schemes. The "relevant habitats" referred to habitats that are listed for protection under Annex I, IV and V of the Habitats Directive and to habitats that are of a National importance.</p> <p>An explanation of the GIS based Sensitivity Map was subsequently included in the Environmental Report and the map reproduced in the NTS.</p>
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### **3.4 Submissions and Observations on the Proposed Amendments and SEA Addendum II to the Environmental Report.**

The environmental assessments of the proposed amendments to the Draft Local Plan were on public display from 10<sup>th</sup> January to 6<sup>th</sup> February 2012. The following table summarises the submissions and observations on the proposed amendments to the Draft Local Area Plan and the SEA assessment of these amendments.

Submission	Response.
<p><b>Department of Arts, Heritage and the Gaeltacht</b></p> <p>The Department referred to a number of proposed amendments made concerning water courses. These included the possibility of diverting them and also the biodiversity strip along each watercourse had been reduced from 10-15 m to 10m. The Department stated that the proposed amendments had the potential to impact negatively on the protected species that may be present, on biodiversity in general and on water quality.</p>	<p>Proposals to mitigate the impact of the reduction of the width of the biodiversity strip were not accepted by the Elected Members.</p> <p>It was considered that the allowance for sensitive diversion of limited sections of streams with environmental mitigation struck a balance between environmental protection and the viability of the Local Area Plan and generally accords with the Greater Dublin Strategic Drainage Study (2005).</p>

<p><b>Kelland Homes Ltd and Sills Ltd</b>  <b>Davy Hickey Properties and</b>  <b>NSJJ Ltd and Noel Connellan and Sean Lyne</b></p>	<p>These submissions suggested that the possibility realignment or culverting watercourses should be allowed for in the LAP.</p>	<p>While the environmental assessment of both the realignment or culverting watercourses was considered likely to result in significant environmental impacts, the response indicated that the allowance for sensitive diversion of limited sections of streams with environmental mitigation struck a balance between environmental protection and the viability of the Local Area Plan and generally accords with the Greater Dublin Strategic Drainage Study (2005).</p>
<p><b>Kelland Homes Ltd and Sills Ltd</b></p> <p>Requests the last sentence of Objective BN7 'the excessive use of retaining walls shall be avoided' should be omitted given the inclusion of the text that 'the level of cut and fill shall be kept to an absolute</p>	<p>States that a landscape buffer would be outside the control of the Local Authority and would incur financial costs for maintenance and management that would unlikely to be paid for by the developer or future residents.</p>	<p>It was also stated that it was not the intention of the Proposed Local Area Plan and Material Alterations to identify, pre-empt or illustrate the diversion of sections of streams prior to justification and design at planning application stage or to remove or alter existing water courses to cater for housing development.</p> <p>The proposal to remove the requirement to avoid the excessive use of retaining walls would allow for significant alterations to the sloping topography of the Boherboy Neighbourhood and the creation of stepped platforms in lieu of utilising the sloping topography.</p>
<p><b>Matt O Sullivan on behalf of Carrigmore Residents Association</b></p> <p><b>Flood Event Data</b></p> <p>Request that the last paragraph in this section 4.9 be amended to include information on the flooding that took place 24/25th October 2011 in addition to the single flood event point north of the Citywest Shopping Centre.</p>	<p>The proposed Material Alteration reduces the extent of the landscape buffer as initially proposed under the Local Area Plan from above the 140 metre contour to above the 150 metre.</p> <p>It is considered that this small semi-mature landscaped area, if developed, would not incur significant maintenance costs especially once matured and acts as an appropriate transition between development and the rural area while acting as a waymarker that frames views of the Dublin Mountains.</p>	<p>This information was incorporated into the LAP text.</p>

## **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 Fortunestown area was part of the SEA process. The scenarios were derived taking into account higher level strategic plans as well as the geographical scope of the area. The Regional Planning Guidelines for the Greater Dublin Area 2004-2016 (RPG-GDA) provide an overall strategic settlement context for the Development Plans of each local authority in the GDA. The alternative scenarios considered were:-

#### ***Scenario 1 – Green Infrastructure***

This scenario would involve the development of the Fortunestown LAP lands using the concept of Green Infrastructure as a guiding theme for development and also as a means of integrating adjoining existing development both within and outside the LAP area with new development into a coherent urban fabric. This scenario would involve the adoption of planning policies which seeks to safeguard the distinctive character and openness of the area and conserve the natural and cultural heritage, the provision of community infrastructure, including schools and cycle/pedestrian routes provided in strategic locations throughout the plan lands.

#### ***Scenario 2 – Environmental / Preservation Approach***

This scenario prioritises the amenity and character of existing residential areas together with the protection of Fortunestown's natural and built environment. This scenario would involve the adoption of planning policies providing for the preservation and protection of the existing built and semi-rural environment and a presumption against development generally.

***Scenario 3: Weak Planning/Market Led Approach:*** This scenario involves allowing growth to follow the demands of the market, facilitating flexibility with planning guidelines, infrastructure capacity or environmental constraints. Under this scenario, the Citywest District Centre would be likely to continue to accommodate retail growth. Expansion of this centre would be uncontrolled and would respond solely to market demand. This would likely result in a deterioration in the economic vitality of Tallaght Town Centre to the east and Saggart Village to the west.

The relaxation of planning controls throughout the plan lands would lead to the continued expansion and demand for the provision of lower density housing permeating throughout the residentially zoned land in this scenario, with little or no provision of community infrastructure to accommodate the existing and future population. There would be little attempt made to integrating adjoining existing development both within and outside the LAP area with new development into a coherent urban fabric.

#### ***Scenario 4: Selective Concentrations along Public Transport Corridors***

In this scenario, components of sustainable development namely economic development, social well-being, environmental protection and enhancement, and resource conservation are integrated in the Local Area Plan. This scenario also responds to the relevant national/regional planning strategies including the National Spatial Strategy and the Regional Planning Guidelines and follows on from a number of strategies carried out within the County including the County Development Plan, the Housing Strategy and Retail Availability studies.

This scenario seeks to focus higher density development in suitable strategic nodes, generally in the northeastern quadrant of the plan lands adjacent to the existing Citywest Business Campus and the Cheeverstown and Citywest LUAS stops, as well as adjacent to the Citywest District Centre and the Fortunestown LUAS stop in the southwestern quadrant of the plan lands.

These areas would be identified as Key Development areas and would be developed / redeveloped to accommodate a higher level of new urban development and deliver the optimum quantitative efficiency of

new population density and commercial floorspace. With the larger quantum of mixed use development targeted at the Key Development Areas, this scenario also allows for a greater degree of coordination of employment, public infrastructure, amenities, community facilities, schools, public transport etc. through a plan-led approach. This scenario would enable the Key Development Areas to attain a sustainable mix of population and employment and provide the critical mass of activity to sustain an integrated public transport network for the area.

## 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 Green Infrastructure	B1 B2 B3 W1 W2 W3 L1 C1 C2 HH1		S1	CH1 CH2 M1 M2		
Alternative Scenario 2 Environmental/ Preservation	B1 B2 B3 W1 W2 W3 CH1 CH2 M1 M2 L1 HH1	S1 <b>C1C2HH1</b>	<b>B1 B2 B3L1 CH1 CH2 W1-W3 M1M2</b>	(Blue indicates indirect impact)		
Alternative Scenario 3 Market Led Approach		B1 B2 B3 HH1 S1 W1 W2 W3 C1 C2 M1 M2 CH1 CH2 L1				
Alternative Scenario 4 Selective Concentrations along Public Transport Corridors	L1 S1 W1 W2 C1 C2 HH1		CH1 M1 W3	B1 B2 B3 M2	CH2	

### Synopsis of SEOs.

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

Each of the Alternative Scenarios was examined under the Strategic Environmental Objectives.

While Scenario 2, (the environmental / preservation approach), does give rise to the greatest level of direct, short-term beneficial environmental effects, it also results in significant negative indirect impacts in the medium to long-term as development is displaced from the Plan area. Scenario 1 and 4 are more likely to bring about better environmental outcomes because of their ability to bring about both controlled growth within the context of Green Infrastructure (Scenario 1) and the necessary sustainable growth to capitalise important environmental mitigation measures and avail of the potential land-use/transportation benefits of the Luas (Scenario 4). Scenario 3 would result in a range of environmental conflicts including biodiversity, water quality, landscape character and climate change (an increase in the number of unsustainable traffic patterns with a decrease in public transport journeys giving rise to the production of greenhouse gases).

The Draft Local Area Plan option that has emerged from the Plan preparation process has a close correlation to Scenario 4 with the additional element and benefits of the Green Infrastructure approach from Scenario 1.

#### 4.4 Effects of Amendments on Preferred Alternative

The amendments to the Draft Fortunestown Area Plan by the elected members in December 2011 resulted in a small number of changes to the policies proposed within the Plan. It was considered that some of these amendments are likely to result in a range of significant negative environmental impacts. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, there are likely to be significant residual negative impacts. The amendments that are likely to result in **significant residual negative impacts** are as follows;

Policy / Objective	Comment	Likely Significant Negative Residual Impacts
The biodiversity strip along each watercourse has been	The amendments as proposed weaken the Green	The reduction of the biodiversity strip to a minimum

reduced from 10-15 m to 10m minimum.	Infrastructure approach and cumulatively and individually will result in damage to these sensitive stream-bank environments.	10m rather than the 10-15m minimum increases the possibility that development will be allowed within areas that have a potential flood risk and reduce the area within which footpaths and cycle ways can be provided, with consequent threat to water quality, biodiversity and landscape character.
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## SECTION 5 SUMMARY OF INFLUENCE OF THE SEA PROCEDURE ON THE PLAN

Overall, the influence of the SEA process on the Fortunestown Local Area Plan has been positive. The early identification of the important environmental issues within the plan area, 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 LAP. Continual assessment of policies and motions, as well as submissions and observations from interested parties also resulted in modification of policies for the benefit of the environment of South Dublin. A small number of amendments to the Local Area Plan are likely to lead to 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.

<b>SEO</b>	<b>Indicators</b>	<b>Information Sources</b>
B1:	Percentage of relevant habitats and designated ecological sites lost	SDCC
B2:	No. of significant adverse impacts to relevant habitats, geological features, species or their sustaining resources in designated ecological sites	SDCC
B3:	Area of Biodiversity Network (County's primary ecological corridors) which has been lost without mitigation	SDCC
HH1	Indicator HH1: No of occasions that PM10 limits have been exceeded in at Air Monitoring stations  Indicator HH2: Percentage of population that are exposed to unacceptable <sup>1</sup> levels of traffic noise	EPA  Dublin Agglomeration Local Councils
S1:	S1i: Area of brownfield land redeveloped  S1ii: Area of greenfield land developed  S1iii: Number of contaminated sites identified and remediated	SDCC  SDCC  SDCC
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  C1ii: Average distance traveled to work or school by the population of the County	Census information  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

<sup>1</sup> As defined by the Dublin Agglomeration Noise Action Plan 2008 - 2013

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  CH2ii: Number of additions to the Record of Protected Structures and the number of additional ACAs	SDCC  SDCC
L1:	L1i: Number of developments permitted in the Mountain, High Amenity, Liffey Valley and Rural zones  L1ii: Percentage of developments permitted in the Mountain, High Amenity, Liffey Valley and Rural zones that have carried out landscaping proposals as required by condition	SDCC  SDCC  SDCC

### **6.3 Reporting**

An SEA Monitoring Report, evaluating the effects of implementing the LAP, will be prepared within two years of the making of the Plan.

### **6.4 Responsibility**

South Dublin County Council is responsible for gathering the monitored data, the preparation of the interim report and the implementation of corrective actions, where necessary.