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In Association with Longford County Council

Strategic Environmental Assessment SEA Statement

Longford County Development Plan 2009 - 2015

March 2009



SEA Statement

Introduction

This document is the Strategic Environmental Assessment (SEA) Statement for the Longford County Development Plan 2009-2015, as required under Article 9(1) of the SEA Directive and Section 13(I) (1) of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 S.I. 436.

The principal purpose of the SEA Statement is to provide information on the decision-making process and to document how environmental considerations, the views of statutory consultees and other submissions received during the consultation phases have been taken into account in the adopted Plan and the arrangements put in place for monitoring. Thus, it illustrates how decisions that led to the adoption of the final plan were taken thereby making the process more transparent.

As required by the Regulations, the SEA Statement includes the following information:

- 1) Summary of how environmental considerations have been integrated into the Plan;
- 2) Summary of how submissions received during consultation have been taken into account in the Plan;
- 3) Reasons for choosing the recommended strategy, in the light of other reasonable alternatives considered;
- 4) Measures that are to be undertaken to monitor the significant environmental effects of implementing the Plan.

SEA Directive

The EU Directive on Strategic Environmental Assessment or SEA (Directive 2002/42/EC) came into force in July 2001 and requires Member States of the EU to assess the likely significant¹ environmental effects of plans and programmes prior to their adoption thus providing for the assessment of strategic environmental considerations at an early stage of the decision making process.

Article 1 of the SEA Directive 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 and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”

The Directive came into effect in an Irish context in July 2004 and was transposed into Irish law through the Planning and Development (Strategic Environmental Assessment) Regulations 2004, S.I. No. 436 and the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004, S.I. No. 435.

Summary of SEA Process

The Longford County Development Plan 2009-2015 has been subject to a process of Strategic Environmental Assessment (SEA) which included the following key phases:

1) Scoping and Statutory Consultation

Scoping involved an initial assessment of the various environmental receptors in order to highlight the existing environmental issues within the County requiring a more detailed assessment and therefore requiring careful consideration during the preparation of the Draft Plan and the Draft Environmental. By highlighting the issues at an early stage it ensured that the issues were firmly to the forefront when considering each of the Plan's policies and objectives and reduced the possibility of relevant issues not being addressed.

¹ “Significant Effects” – These effects include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative effects.

The scoping aspect involved consultation with the statutory consultees, affording each an opportunity to comment on the highlighted issues and the Plan in general. The statutory consultees include:

- The Environmental Protection Agency;
- The Department of the Environment, Heritage and Local Government; and
- The Department of Communications, Energy and Natural Resources.

The scoping exercise was carried out in May 2007.

2) Environmental Assessment and Preparation of Environmental Report

The Environmental Report is the documentary evidence of the assessment process. As per the Directive and the Regulations, the Environmental Report must include the following:

- An outline of the content and main objectives of the Longford County Development Plan and the relationship between this and other relevant plans or programmes;
- The environmental characteristics of the area affected by the plan;
- Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC (Directive for the Conservation of Wild Birds) and 92/43/EEC (Conservation of Natural Habitats and of Wild Fauna and Flora);
- The environmental protection objectives, established at International, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
- The likely significant effects on the environment, including issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape;
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
- An outline of the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;
- A description of the measures envisaged concerning monitoring in accordance with Article 10;
- A Non-Technical Summary.

The purpose of the Environmental Report was to assess the likely environmental implications or consequences of decisions regarding the future accommodation of growth in the Plan area. The Environmental Report was presented, at draft stage, as a separate document to the Plan, however both documents must always be read in conjunction with each other.

Any proposed amendments to the Draft Plan at each stage of the process, from preparation through to the public consultation phases, were assessed in terms of their environmental impacts and the results were presented to the Elected Members. At each stage of the process the Elected Members were required by legislation to take into account the Environmental Report before the adoption of the Plan.

3) Statutory Consultation on Proposed Plan and Environmental Report

The Draft Environmental Report and Draft Longford County Development Plan were made available for public viewing and submissions or observations were invited from the Environmental Authorities, the Prescribed Bodies and the general public from the 12th of March to the 23rd of May 2008.

Following on from this phase of the process, the submissions were reviewed and compiled in a Manager's Report which discussed the main issues in each submission; proposed a response to the issues raised and made a recommendation to the Elected Members for amendments to the Draft Development Plan and the Draft Environmental Report. The Planning and Development Act 2000 (as amended), requires that such Material Amendments are subsequently made available for public consultation.

The proposed Material Amendments to the Draft County Development Plan 2009-2015, the Draft Environmental Report and the Draft Appropriate Assessment were put on public display on the 20th of

November 2008 until Monday 18th December 2008. During the 4 week public consultation period a total of 8 written submissions/observations were received by the Planning Authority.

Following consideration of the submissions the County Manager produced a report on the proposed Material Amendments for deliberation by the Elected Members.

In both instances all material amendments proposed to the Draft Plan were subject to the procedures of the SEA process. There is a requirement that each amendment is systematically appraised to determine the likely significant effect on the environment of implementing the policy. Upon completion of this exercise it was generally concluded that the proposed amendments were considered to have a neutral to positive impact on the environmental receptors.

Consequently the Longford County Development Plan 2009-2015 was adopted on the 16th of February 2009 and came into force on the 16th of March 2009.

4) Preparation of SEA Statement

This is the final stage in the Strategic Environmental Assessment process and is contained within this document.

Part 1 - How Environmental Considerations were integrated into the Plan

The environment has been given careful consideration during the preparation of the Plan and this was demonstrated and documented in the Environmental Report. This section of the SEA Statement highlights and records where significant aspects of the environment were considered and addressed in the Plan and at what stage in the process this occurred. Also it includes a summary of those submissions which led to amendments to the Plan and positively enhanced it's overall environmental performance.

Scoping Stage

Firstly, at the outset of the process a number of environmental issues were identified as being of concern within the County and requiring particular attention in the Plan. The issues raised were:

- Biodiversity;
- Landscape and Visual Amenity;
- Water quality; and
- Soil and Geology.

The following is an overview of how the environmental issues identified at the outset are addressed in the Plan.

Biodiversity

A number of areas within County Longford are designated as Natural Heritage Areas (NHA), Special Areas of Conservation (SAC) and Candidate Special Areas of Conservation (SAC), and are therefore protected under National and European legislation.

These areas contain vulnerable, rare and threatened species of wild fauna and flora and wildlife habitats and it is essential that they are afforded continued protection under the County Development Plan.

In response to the need to provide for the protection of these valuable assets, the following policies have been incorporated into the Plan.

NHB 6	It is the policy of the Council to protect sites designated in National and European legislation, and in other relevant International Conventions, Agreements and Processes. This includes sites proposed to be designated or designated as: * Special Areas of Conservation under the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora) * Special Protection Areas under the Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds) Both the Birds and Habitats Directives have been transposed in Irish law by Ministerial Regulation. The European Communities (Natural Habitats) Regulations, 1997 are the most important of these because they provide for the protection measures and management regime that apply to SPAs and SACs. * Natural Heritage Areas (NHAs), Nature Reserves, and Refuges for Flora or Fauna under the Wildlife (Amendment) Act, 2000.
NHB 7	The Council shall seek to identify, protect and conserve, in co-operation with the relevant statutory authorities, vulnerable, rare and threatened species of wild fauna and flora and their habitats with particular reference to those species identified in national and European legislation, and in other International Conventions, Agreements and Processes.
NHB 8	The Council shall seek to co-operate with statutory and other relevant agencies to identify and protect a representative sample of the County's wildlife habitats, of local or regional importance, not otherwise protected by legislation. In addition, it is Council policy to protect Ramsar sites under the The Convention on Wetlands of International Importance (especially as Waterfowl Habitat).
NHB 9	Protect and enhance important landscape features and their setting including rivers, streams, canals, lakes and associated wetlands such as reedbeds and swamps; ponds; springs; bogs; fens; trees; woodlands and scrub; hedgerows and other field boundary types such as stone walls and ditches. These are important because: (a) they form part of a network of habitats, corridors and 'stepping stones' essential for wildlife to flourish, thus providing a high quality natural environment for all, and/or (b) they protect and enhance surface water and groundwater resources and are essential as part of the integrated approach to the management of water resources, necessary to ensure the highest water quality into the future, as set out in the Water Framework Directive (Directive 2000/60/EC establishing a framework for Community action in the field of water policy).

Landscape and Visual Amenity

Longford is centrally located within the Country and contains many scenic views and landscapes of intrinsic natural value. The previous County Development Plan (2003-2009) identified views and prospects where natural beauty can be enjoyed. The effectiveness of those policies relating to these areas requires assessment and the areas designated for protection may require revision where necessary.

Also there are Broad Zone areas surrounding the lakes, rivers, canals and deciduous woodlands which were designated for protection against inappropriate development. The adopted Plan will continue to afford protection to these areas by the inclusion of the following policies:

LCA 1	It is the policy of the Council to protect and enhance the County's landscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the existing local landscape. Proposed developments, where located within or adjacent to sensitive landscapes (as defined in the assessment), may be required to provide a landscape report detailing how the proposal will impact on the landscape and mitigation measures to be taken where necessary to address negative impacts. Proposed developments which have a detrimental impact on the landscape will not normally be permitted.
LCA 2	Longford County Council recognises the diverse and unique landscape character of the County, and as such, landscape conservation areas may be designated in order to achieve its objective of protecting and enhancing the County's landscape. Physical development shall not adversely impact on areas designated as visually important/sensitive under this section.
LCA 3	It is the policy of the Council to preserve views and prospects as illustrated on the accompanying Map as part of Appendix 7 and as listed in the following table. Views are divided into full and intermittent in order to differentiate areas where scenic views may be partial or absent along a particular route. The following table lists the routes (as numbered on the map) and lists the townlands through which they pass for identification purposes.

Water quality

Over the course of recent years, the quality of surface and ground water within the county has witnessed considerable pressure as a consequence of the substantial rise in the quantity of development being experienced across the County. As a result the Plan has considered these issues and provided policies to ensure that development can be facilitated while also ensuring that there are suitable checks in place to ensure that the water quality of the County improves rather than deteriorates over the Plan's life span.

Specifically the following policies are contained within the Plan.

WS 7	It is the policy of the Council to restrict or prohibit the large-scale development of unserviced land where existing serviced land of an appropriate size and nature to meet the reasonable needs of the proposed development exists in the vicinity.
WS 8	To ensure that the public drinking water supply of the County complies with relevant EU drinking water standards and to extend supply, where necessary and where resources permit, to meet demand
WS 9	To protect existing sources of municipal water supplies through restricting potentially pollutant development within a specified distance from the proposed source. In this regard, buffer areas are identified in Appendix 5. In these areas it must be demonstrated that development proposals will not have an adverse impact on the proposed water source.
WS 10	To protect, within its powers, valuable groundwater sources and important surface water bodies from pollution through infiltration by domestic, agricultural or other sources effluent/pollutant material.
WS 11	Where potential municipal water supplies are identified, it shall be the policy of the Council to restrict potentially pollutant development for a specified distance from the proposed source.
AGR 6	To control, through the development management process and the relevant environmental legislation, the application of effluent spreading on land in order to protect ground and surface water sources in the County. This will limit spreading to certain times of the year and/ or prohibit spreading in certain areas.

Soil and Geology

The soils of County Longford have been subject to pressures from land spreading of farm effluent and application of fertilisers in addition to the increasing numbers of one-off houses in the countryside using conventional septic tank methods of domestic effluent disposal. Afforestation and peat harvesting also pose a substantial threat to the soils of the county.

In response to these issues the following policies have been incorporated into the Plan.

ENV 15	The Council shall protect soils identified as agriculturally important in the Landscape Assessment through the prevention of inappropriate use through the development management process.
ENV 16	The Council shall aim to prevent pollution in areas of poor soils through the implementation of relevant EPA and Department of Agriculture guidance and regulations in the percolation and/or spreading of domestic and agricultural effluent to land.
ENV17	The council shall investigate the potential uses of cutaway bogs in the County and shall particularly consider the development of sustainable and renewable energy projects. Proposals to flood these areas shall be discouraged.
GEO 1	It is policy of the Council to protect sites of geological importance within the County, as listed in the above table, from inappropriate development that may result in the deterioration of the geological feature.

Statutory Consultee’s Comments on Scoping

As stated the statutory consultees were asked to comment on the content of the Environmental Report and to highlight issues which they felt would be of concern and require particular attention during the assessment. The submissions from the respective State Departments/Agency were broad in nature and encompass numerous aspects of the natural and built environment. In summary the principle issues of environmental concern within the county are:

- Eutrophic status of Loughs Ree and Gowna due to ongoing pollution from agricultural practices and domestic effluent treatment systems.
- Flooding of lands, particularly in the western environs of Longford Town
- CO₂ emissions - Lanesboro Power station
- Unsustainable transport patterns and lack of viable public transport system due to highly dispersed settlement
- Unauthorised disposal of waste, particularly C&D wastes
- Unauthorised Quarrying operation/practices – impacts on air, landscape, human health and flora/fauna

The issues highlighted have been incorporated into the Plan where appropriate and/or relevant.

Environmental Report Preparation Stage

Finally, the Environmental Report highlighted a number of ‘Threats and Trends’ on each of the environmental receptors. During the formulation of the Plan, the need to address these issues was acknowledged and as a consequence a series of measures were provided in order to reduce or indeed eliminate potential impacts. The following are noted:

Proposed responses to 'Threats' raised during the assessment of the existing environment.

Topic	Identified Threat	Proposed Policy Response	
Human Beings	The GoSRH have also explicitly placed an emphasis on the consideration of social as well as physical issues in the assessment of planning applications for one-off rural houses, such as the maintenance of rural communities, which may provide for positive impacts in terms of human health, through the maintenance, enhancement and, in some cases, rebuilding of existing neighbourhoods and social networks.	HOU RUR 7	It is policy of the Council to have regard to the Sustainable Rural Housing Guidelines for Planning Authorities, April 2005. The principles set out in the guidelines require that new houses in rural areas be sited and designed to integrate well with their physical surroundings and be generally compatible with: i. The protection of water quality in the arrangements made for on site waste water disposal facilities; ii. The provision of a safe means of access in relation to road and public safety; iii. The conservation of sensitive areas such as natural habitats, the environs of protected structures and other aspects of heritage. In regard to septic tanks, the Planning Authority will be positively disposed towards the use of septic tanks and/or with additional package treatment systems, where necessary, with Irish Agrément Board Certification. In order to protect groundwater, all site suitability tests shall be carried out in accordance with the Environmental Protection Agency Waste Water Treatment Manuals – Treatment Systems for Single Houses, or any subsequent update.
		HS 2	Without prejudice to the above(Policy HS 1), housing shall be provided in rural areas where it promotes the role, and combats isolation of, the farming community, and promotes social inclusion
		HS 3	The Council will promote and encourage the provision of a broad mix of housing types in towns and villages in order to cater for the changing demographic outline of the County. This will include the provision of housing for the elderly, persons with disability, lone parents and travelling families.
County Longford, along with the remainder of the country has experienced ever increasing development pressures with trends toward greater commuting times with relative homogeneity in terms of job prospects. Challenges for the future include the retention of the younger age cohorts within the County and encouraging those who work within the County to live within it also.	HS 5	It is the policy of the planning authority to facilitate the provision of housing units to sufficiently cater for Social and Affordable Housing need - as established in the County Housing Strategy - over the Plan period.	
	HS 9	It will be necessary for the planning authority to reserve 20% of applications for private housing developments to provide an element of Social and Affordable Housing, in order to provide an even spread of housing of all types and encourage social integration ⁶ .	
	HER 4	The Planning Authority shall endeavour to identify important landscapes and habitats and the importance of local character, identity and distinctiveness, in both the natural and built heritage of the County. This shall include an investigation of the Heritage Plan for the County into locally important and small scale heritage sites. Where these have been identified as important under the Heritage Plan, they shall be afforded the relevant protection	
Flora and Fauna	Designated areas such as NHAs, SACs and SPA are important features which require a concerted effort to protect them. These areas will form the basis of controlled development within the county and severe restrictions imposed on further development which may adversely impact on the overall integrity of the protected area.	NHB 6	It is the policy of the Council to protect sites designated in National and European legislation, and in other relevant International Conventions, Agreements and Processes. This includes sites proposed to be designated or designated as: * Special Areas of Conservation under the Habitats Directive (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora) * Special Protection Areas under the Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds) Both the Birds and Habitats Directives have been transposed in Irish law by Ministerial Regulation. The European Communities (Natural Habitats) Regulations, 1997 are the most important of these because they provide for the protection measures and management regime that apply to SPAs and SACs. * Natural Heritage Areas (NHAs), Nature Reserves, and Refuges for Flora or Fauna under the Wildlife (Amendment) Act, 2000.
Soil and Geology	Land spreading of farm effluent and application of fertilisers in these areas is a delicate balance, given the poor permeability of the soil and the proliferation of water bodies in this area, many of which are protected as European Sites and vulnerable to eutrophication through excessive nitrate run-off from land.	AGR 6	To control, through the development management process and the relevant environmental legislation, the application of effluent spreading on land in order to protect ground and surface water sources in the County. This will limit spreading to certain times of the year and/ or prohibit spreading in certain areas.
		AGR 7	The Planning Authority will require adequate provision for the collection, storage and disposal of effluent produced from agricultural developments. Developers are required to comply with relevant Department of Agriculture Guidelines and the Nitrates Regulations in this regard.
		GEO 1	It is policy of the Council to protect sites of geological importance within the County, as listed in the above table, from inappropriate development that may result in the deterioration of the geological feature.

<p>Water Quality</p>	<p>Threats to surface and ground water are increased through one-off dwellings and their reliance on conventional septic tanks in certain areas. In certain areas the soil's poor percolation characteristics render them unsuitable for conventional septic tank methods of domestic effluent disposal. This issue is consistently highlighted by the Northern Regional Fisheries Board in submissions on planning applications in the area.</p>	<p>HOU RUR 7</p>	<p>It is policy of the Council to have regard to the Sustainable Rural Housing Guidelines for Planning Authorities, April 2005. The principles set out in the guidelines require that new houses in rural areas be sited and designed to integrate well with their physical surroundings and be generally compatible with:</p> <ul style="list-style-type: none"> i. The protection of water quality in the arrangements made for on site waste water disposal facilities; ii. The provision of a safe means of access in relation to road and public safety; iii. The conservation of sensitive areas such as natural habitats, the environs of protected structures and other aspects of heritage. <p>In regard to septic tanks, the Planning Authority will be positively disposed towards the use of septic tanks and/or with additional package treatment systems, where necessary, with Irish Agrément Board Certification. In order to protect groundwater, all site suitability tests shall be carried out in accordance with the Environmental Protection Agency Waste Water Treatment Manuals – Treatment Systems for Single Houses, or any subsequent update.</p>
		<p>HOU RUR 8</p>	<p>EFFLUENT DISPOSAL, DRAINAGE AND WATER SUPPLY</p> <ul style="list-style-type: none"> a) The minimum acceptable site size for a dwelling on an individual treatment system (septic tank and percolation area or equivalent) is 0.2ha. Where there are existing treatment systems adjacent, and/or where percolation tests are borderline (in the upper or lower 20% of permitted limits) this figure shall be increased and/or the applicant may be required to install an additional treatment system. b) The applicant shall submit details of the proposed effluent treatment system in accordance with the relevant wastewater treatment manual (or any update) by the EPA. c) Where a treatment system is to be installed, the applicant shall submit full site specific details of the proposed system certified by a suitably qualified and indemnified individual, and shall include Irish agrément board certification and manufacturer's certification of site suitability. Maintenance agreements for a minimum period of five years shall be in place prior to the first occupancy of the dwelling. d) In order to safeguard ground and surface water resources, Longford County Council shall investigate the establishment of a panel of assessors for the submission of site assessments for effluent treatment systems in accordance with the relevant EPA guidelines. The purpose of this panel is to ensure an acceptable and consistent level of quality in the reports submitted. On the establishment of this panel, site assessments will only be accepted from approved assessors. e) Details of proposed methods of surface water disposal shall be provided, including location of soakpits and the means of prevention of surface water accessing the public roadway. f) Where residential development is proposed within reasonable distance of an appropriate mains water supply, the developer will generally be required to connect to the mains system in favour of using bored wells on-site for domestic water supply purposes.
<p>Groundwater quality is protected under the requirements of the Water Framework Directive (2000/60/EEC). Groundwater vulnerability has not yet been comprehensively assessed in the County, which represents a significant data gap in terms of baseline environmental information. Several studies have been carried out on the potential of groundwater for potable supply to the north of Longford Town, where a good quality visean limestone aquifer has been identified.</p>		<p>WS 7</p>	<p>It is the policy of the Council to restrict or prohibit the large-scale development of unserviced land where existing serviced land of an appropriate size and nature to meet the reasonable needs of the proposed development exists in the vicinity.</p>
		<p>WS 8</p>	<p>To ensure that the public drinking water supply of the County complies with relevant EU drinking water standards and to extend supply, where necessary and where resources permit, to meet demand.</p>
		<p>WS 9</p>	<p>To protect existing sources of municipal water supplies through restricting potentially pollutant development within a specified distance from the proposed source. In this regard, buffer areas are identified in Appendix 5. In these areas it must be demonstrated that development proposals will not have an adverse impact on the proposed water source.</p>
		<p>WS 10</p>	<p>To protect, within its powers, valuable groundwater sources and important surface water bodies from pollution through infiltration by domestic, agricultural or other sources effluent/pollutant material.</p>
		<p>WS 11</p>	<p>To protect, within its powers, valuable groundwater sources and important surface water bodies from pollution through infiltration by domestic, agricultural or other sources effluent/pollutant material.</p>
<p>Water Supply</p>	<p>UFW (unaccounted for water) is currently estimated at approximately 60% of total demand. It is recognized that a proportion of this is due to insufficient metering and customer consumption data, but unfortunately much is due to leakage. Metering will be instrumental in helping to source leaks and conserve water levels.</p>	<p>WS 1</p>	<p>To consolidate the provision of basic environmental services in accordance with the 6 year programme as outlined, providing an integrated infrastructural base for the physical, economic and social development of the towns and villages in County Longford</p>

Air quality	The biggest single environmental impact of peat harvesting is its subsequent burning to generate electricity and heat, instantaneously releasing CO ₂ that has remained locked inside this carbon sink for thousands of years and contributing to the global greenhouse effect. The power station at Lanesboro in the west of the County, operated by ESB and Bord na Mona, also abstracts water from the Shannon for use as a coolant. This water is then returned to the river at a substantially higher temperature, with implications for the flora and fauna of the river system.	ENV 3	The Council will seek to reduce the impacts of existing pollutant activities through the following measures: <ul style="list-style-type: none"> - Negotiation of a reduction in the pollutant activity to a non-polluting level or a revision of operating times to reduce the impact of the activity on adjacent land uses - Relocation to a more appropriate location where adjacent land uses are more compatible - Imposition of conditions restricting emissions/activity - Use of enforcement action against unauthorised developments/uses
		ENV 4	The Council shall pursue the preparation, establishment and implementation of / compliance with the following documents/regulations, and any future updates, through its Sanitary Services Section: <ul style="list-style-type: none"> o The Waste Management Plan for the Midlands Region o The National Hazardous Waste Plan o EU and National legislation on the prevention of Air and Noise Pollution
Landscape and Visual	Inappropriate scale and type of development at inappropriate or sensitive location.	LCA 1	It is the policy of the Council to protect and enhance the County's landscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the existing local landscape. Proposed developments, where located within or adjacent to sensitive landscapes (as defined in the assessment), may be required to provide a landscape report detailing how the proposal will impact on the landscape and mitigation measures to be taken where necessary to address negative impacts. Proposed developments which have a detrimental impact on the landscape will not normally be permitted.
	Due to their relatively poor agricultural characteristics, a substantial portion of the poorer quality soils has been subject to afforestation, with substantial and long-term visual impacts. However, the forestry industry has now turned toward the use of more productive soils. The implications of this trend have yet to become apparent, but may include the proliferation of non-managed exotic monoculture forestry tracts in previous permanent pasture regions and large areas of acidified soils.	LCA 2	Longford County Council recognises the diverse and unique landscape character of the County, and as such, landscape conservation areas may be designated in order to achieve its objective of protecting and enhancing the County's landscape. Physical development shall not adversely impact on areas designated as visually important/sensitive under this section.
		LCA 3	It is the policy of the Council to preserve views and prospects as illustrated on the accompanying Map as part of Appendix 7 and as listed in the following table. Views are divided into full and intermittent in order to differentiate areas where scenic views may be partial or absent along a particular route. The following table lists the routes (as numbered on the map) and lists the townlands through which they pass for identification purposes.
Cultural Heritage	Cultural Heritage, including all its various elements, represents a finite resource, one which must be protected in order to enrich future generations. Thus, development which is deemed to adversely on structures, features, historical areas etc will not be permitted. A proactive approach will be adopted by the local authority who will continue to work with the various state agencies and departments as well as stakeholders ensure the ongoing protection of this element of the environment.	HER 5	Any proposed development which may impact on the integrity and/or setting of any monuments, sites, objects or areas of archaeological, cultural, architectural, historical or Heritage importance under the protection of this Development Plan and/or the Department of the Environment, Heritage and Local Government shall be referred to the relevant section of the DoEHLG for observations/comment prior to a grant of permission/approval being obtained. In particular, the unique historical, mythological and cultural significance of Ardagh Mountain shall be recognised. Developments which materially impinge on the character of the mountain will not be permitted.

Part 2 – How Public submissions were incorporated into the Plan

This section details how submissions and observations made to the planning authority relating to environmental concerns were taken into account during the preparation of the County Development Plan and Environmental Report.

Public consultation Draft Plan Phase - Submissions and Observations

As stated previously, there were two periods of public consultation on the Draft Plan and accompanying Draft Environmental Report. Firstly, the Draft Plan and Draft Environmental Report went on display on the 21st of May 2008 and comments/observations/submissions invited. At this stage of the process a number of submissions were received. While the majority of the submissions were mainly concerned with land zonings, other concerns raised included community concerns, village housing, heritage, transportation networks and employment/enterprise.

Each of the submissions/observations received were assessed and a detailed consideration of the submissions was carried out, culminating in the development of the Manager's Report on this phase of the consultation process. Furthermore, during this phase of the preparation of the Development Plan particular emphasis was given to the assessment of submissions that referred specifically to the Draft Environmental Report. While all submissions relating to the Draft Plan and Draft Environmental Report were assessed and amendments incorporated where necessary, the submissions provided by the Environmental Protection Agency and the Department of the Environment, Heritage and Local Government offered significant input to the final Plan and Environmental Report. A summary is provided below.

1) Environmental Protection Agency and Department of the Environment, Heritage and Local Government.

The submission from the Environmental Protection Agency was one of the key submissions received which related specifically to the Draft Environmental Report and the environmental objectives contained within the Draft Plan. The submission detailed a number of points which are discussed below and divided into issues concerning the Environmental Report and those issues related to the Draft Plan. The key issues raised related to integration of the plan making process with the development of the SEA, specific water protection measures and the protection of biodiversity. Each is dealt with in this section.

Integration

Although the strengths of the Environmental Report were acknowledged, the EPA recommended a requirement to promote full and transparent integration of both the Plan and SEA Process. A key theme to emerge from issues relating to the Draft Environmental Report involved promoting a clear linkage from the beginning of the process through to the end of the process.

The EPA considered that further developing this concept, using evidence based data, well defined mitigation measures and a developed monitoring system, would provide the Local Authority with a clear indication of how development over the life time of the Plan may effect the environment, in both a negative and positive way.

The process of preparing both the Plan and Environmental Report was and is an iterative one, thereby ensuring full integration of environmental concerns into the plan at an early stage in the process. However the linkage may not have appeared as clear as one would hope and therefore as a result it was proposed to amend the draft Plan and include a number of additional policies aimed at ensuring adequate protection of natural resources. Some of the principal policy inclusions are provided overleaf.

Furthermore, a Table was developed, showing the linkage from the identification of the potential significant adverse effect to the monitoring process and including proposed mitigation measures. This is provided as Table 3 in the Environmental Report.

Also, a series of tables were included in the Environmental Report which plainly set out the issues at the outset; the issues identified during the preparation of the plan and the measures proposed to mitigate against any identifiable potential impact. This is discussed further below.

Water Quality

The first environmental considerations that the EPA recommends should be included within the Plan are a number of issues relating to water (see summary of submission above for list of points). These points stretch across numerous areas and the EPA felt their inclusion would afford additional strength to the relevant sections of the Draft Plan through improving the consideration of the environment and thus providing better integration between environmental factors and the remaining sections of the Plan.

While a number of recommendations for alterations to the Plan were carried out, the most significant is relation to water quality was the inclusion of policy ENV9

The Council shall incorporate the recommendations contained within any future River Basin District/River Basin Management Plan for the Shannon International River Basin District and the North Western River Basin District, in order to facilitate the Water Framework Directive.

Also, as a direct result the following policies were recommended for inclusion in the Plan:

ENV 10: *the Council, where appropriate, shall seek to control and manage any potential point or diffuse sources of pollution with a view towards improving and maintaining good water quality. Such activities include but are not restricted to wastewater and industrial discharges, landfills, quarries, mines, contaminated land, agricultural activities, wastewater from un-sewered properties, forestry activities and the use and discharge of dangerous substances*

ENV 11: *Development proposals that involve the physical modification of water bodies, including abstraction of water, shall be considered having regard to the potential affect on habitats and plant and animal species, with particular consideration given to Natura 2000 sites and specific actions proposed where negative impacts are anticipated*

Drinking Water:

WS 14: *The Council shall consult the EPA publication "The Provision and Quality of Drinking water in Ireland" (and any subsequent update) in the establishment and maintenance of water sources in the County*

Bathing Water:

ILW 15: *The council shall investigate existing bathing areas within the county with a view towards the implementation of the Bathing Water Quality Regulations 2008, particularly with regard to the protection of human health*

Groundwater Protection:

ENV 8: *The Council, in tandem with the Geological Survey Ireland (GSI) will continue to develop and implement the Groundwater Protection Scheme for the County*

Waste Water Treatment:

WS15: *The Council shall consult the EPA publication "Urban Wastewater Discharges in Ireland for Population Equivalents Greater than 500 persons – a Report for the Years 2004-5" (and any subsequent update) in the provision, maintenance and expansion of water treatment systems in the County.*

Water Conservation;

WS 5: *The Council shall pursue the preparation, establishment and implementation of the following documents insofar as they relate to the Water Services Section:*

- *The Sludge Management Strategy*
- *The Water Conservation Plan, including the promotion of water conservation measures in new and existing developments*
- *The Rural Water Plan*

Flood Prevention;

FLO 1: In areas susceptible to flooding, development may be restricted and where necessary developers will be required to submit a Flood Risk/Impact Assessment and proposals for a Sustainable Urban Drainage System (SUDS). This shall also apply in areas where it is considered that the proposed development will impact on flooding elsewhere

FLO 2: The Council in tandem with the OPW, will support the preparation, establishment and implementation of any future Flood Risk Assessment and Management Studies prepared for catchments within the County Area

FLO 3: The Council shall have regard to the provisions of any future Guidelines issued by the DoEHLG regarding Flooding

Biodiversity

The second key group of environmental considerations relates to the inclusion of policy and objectives regarding biodiversity within the County. Similar to above, the following additions were considered to add strength to the existing (draft stage) policies within the Plan.

County Habitat Mapping and Wetland Survey:

NHB 5: The Council, in consultation with the National Parks and Wildlife Service, shall pursue the preparation, establishment and implementation of Habitat Mapping and a Wetland Survey for the County

In addition Policy **NHB 16** was amended to;

NHB 20: Proposed large- scale developments particularly on greenfield sites and in environmentally sensitive areas shall generally be avoided, but where this does arise, proposals shall be assessed in terms of their impact on the biodiversity of the area and where appropriate screened for Appropriate Assessment in consultation with the National Parks and Wildlife Service

Appropriate Assessment

A specific point that emerged with relation to Biodiversity and was raised by both the EPA and the Department. It was advised that the County Development Plan must undergo an Appropriate Assessment on the potential impact the Plan's implementation on Natura 200 sites in accordance with Article 6 of the *Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna*. Following this recommendation the Local Authority carried out an assessment and it was subsequently put on display to the public in November 2008.

Environmental Report

In relation to the SEA Environmental Report specifically the EPA recommended that a specific objective ensuring full compliance with the requirements of the SEA Directive and associated Planning and Development (Strategic Environmental Assessment) Regulations, 2004, is added to the plan and the following was proposed and accepted for inclusion in the Plan

It is an objective of the Council to ensure, where required, that there is full compliance with the SEA Directive and associated Planning and Development (Strategic Environmental Assessment) Regulations, 2004

As a direct result of the EPA's recommendations the following amendments to the Draft Environmental Report were undertaken:

Data usage: A number of additional maps were prepared by technical staff from Longford County Council and were added to Chapter 4 of the Environmental Report.

Alternatives: The alternatives put forward for assessment in the alternatives section were deemed to be viable alternatives to the preferred strategy. However on foot of this submission Chapter 6 of the Environmental Report was amended.

Evolution of the environment in the absence of the plan: While this issue was dealt with in the baseline assessment of the environmental receptors all sections on “The Effects of Not Reviewing the Plan” were revised accordingly.

Environment Effects: In accordance with the SEA Directive an assessment of the effects of implementing the plan was provided. However, it was decided to expand the terminology used in describing the assessment to include the following; secondary, cumulative, synergistic, short, medium and long terms, permanent and temporary, positive and negative, where appropriate. To this end the assessment contained in Chapter 7 was amended accordingly.

Mitigation: A detailed schedule of mitigation measures is provided in Chapter 8 of the Environmental Report comprehensively dealt with all the relevant issues in a succinct manner. However, it was proposed to amend Chapter 7 of the Report, which discussed the outcomes of the environmental assessment. The purpose of the amendments were to clarify how the process of preparing the plan and the Environmental Report together allows for the issues raised to be dealt with at the outset.

Also, the assessment revealed that two specific policies may impact negatively on the environment through their implementation. It was proposed to include an additional Table at the end of Chapter 8 (Mitigation Measures). This table provides discussion on the potential environmental effect of each of these policies, the proposed mitigation measures and who will monitor this particular aspect of the plan.

Monitoring: A revised schedule of monitoring was devised to take account of the following:

- EPA publication “Environment in Focus 2006”
- EPA Publication “Water Quality in Ireland 2006”

Also the revised monitoring programme was expanded to include:

- Appropriate thresholds which determine intervention
- Inclusion of monitoring frequency and responsibility
- Monitoring of positive and negative impacts
- Ongoing review of environmental targets and indicators. Responsibility clearly defined.

The mitigation measures outlined in Chapter 8 will be implemented. However, on the recommendation of the EPA, the following has been included in the Plan and repeated in Chapter 8 of the Report.

“The Council will implement the findings and recommendations of the Strategic Environmental Assessment and will undertake the measures proposed in the Environmental Report.”

Environmental Objectives: Finally the EPA recommended that additional objectives be added to chapter 5 and these included:

To provide for the conservation of natural resources, including soils within the County. (Soils and Geology)

To protect and conserve agricultural land within the county (Soils and Geology)

To promote development which addresses and combats the factors which affect climate change (Climate Change)

Public Consultation Amendments Phase

The second stage of the consultation process was carried out for a four-week period from the 20th of November 2008 to the 18th of December 2008. Eight submissions were received with regard to the proposed amendments and a number of acknowledgements were received from:

1. Department of the Environment, Heritage and Local Government
2. National Roads Authority (NRA)
3. Environmental Protection Agency (EPA)
4. Department Of Communications, Energy And Natural Resources.
5. Cllr. Seamus Butler
6. Pat Denning
7. Mark Cunningham On Behalf Of Mr. Eamon Mulligan
8. George Armstrong

Appropriate Assessment

As mentioned previously, in addition to the proposed amendments of the Draft Plan, an Appropriate Assessment Report was also placed on display and submissions with relation to this invited, however no specific submissions were received on the Appropriate Assessment.

Strategic Environmental Assessment

A further submission was received from the EPA.

The EPA indicated in their submission that the proposed amendment with regard to policy ENV 11 should be revised to include specific reference to the requirements for Appropriate Assessment.

Env 11: Development proposals that involve the physical modification of water bodies, including abstraction of water, shall be considered having regard to the potential effect on habitats and plant and animal species, with particular consideration given to Natura 2000 sites and specific actions proposed where negative impacts are anticipated. Where appropriate, proposals shall be screened for appropriate assessment in consultation with the National Parks and Wildlife Service

Conclusion

It has been demonstrated in the Strategic Environmental Assessment Environmental Report that the overall impact of the development strategy for the County will, in general, have a neutral to positive impact on the various environmental receptors. While this remains the case, key measures, including both mitigating and enhancement have been highlighted in Chapter 8 of the Environmental Report. These mitigation measures are designed to enhance the local environment and to prevent potential adverse impacts.

The consultation process has been invaluable in improving the environmental protection credentials of the Plan and the incorporation of amendments in this regards is testament to the transparency of the process.

Ultimately, and significantly the Council have given an undertaking to implement the findings and recommendations of the Strategic Environmental Assessment and will embark on the measures proposed in the Environmental Report. Specifically the Plan contains the following policy:

“The Council will implement the findings and recommendations of the Strategic Environmental Assessment and will undertake the measures proposed in the Environmental Report.”

Part 3 – Reasons for Choosing the Recommended Strategy

Introduction

The issue of alternatives is a critical function of the SEA process and is necessary to evaluate the likely environmental consequences of a range of alternative development strategies for the county within the constraints imposed by environmental conditions. The alternatives have been considered at an early stage of the process and the principal issues arising from early discussions are presented here. In accordance with SEA guidelines the alternatives put forward in this section are realistic and capable of implementation.

Firstly however it is useful to reiterate the core aim of the plan which is “*to provide a framework for the proper planning and sustainable development of the county*”. Thus the plan is based on the principles of sustainable development and therefore the plan is promoted in accordance with national and regional guidelines.

In relation to County Longford, sustainable development can be achieved through the promotion and maintenance of viable urban and rural communities, concentration of infrastructural investment, minimization of greenhouse gases and preservation of the quality and character of the natural and man-made environment.

As stated, at the outset of the County Development Plan process, a number of development scenarios were highlighted based on the current and predicted future needs of the County. In broad terms the scenarios were grouped into three viable but vary different approaches. Each scenario has a differing outcome both in planning terms and in terms of the environmental consequences and these are discussed further below. The alternatives considered are broadly defined as:

- Option 1 – ‘Weak’ (Worst Case);
- Option 2 – ‘Mixed’ – Open for consideration, Developer led; and
- Option 3 – ‘Strong’ - Inclusive.

The Options:

The local authority recognizes that the population of the county is likely to increase over the coming years. The local authority has a duty to plan for this increase and to set out how it can be suitably accommodated within the county. Allied to this is the provision of essential services and appropriate infrastructure to facilitate both the existing and future population needs and to ensure employment opportunities exist through economic development or activity.

Option 1: ‘Weak’

The weak approach to the future development of County Longford can be viewed as the ‘worst-case’ scenario. In order to develop under this scenario, the Planning Authority would allow for development to proceed in an ad hoc manner at any location within its functional area. The scenario envisages potentially inappropriate lands around settlements zoned for development without truly assessing the overall need for, or scale of development. As a result development pressure both on the fringes of towns and villages as well as in the open countryside would result with significant levels of ribbon development between settlements. Consequently development would occur in unserved or insufficiently serviced areas. This policy would not require careful consideration of the environmental impacts of such development, either individually or cumulatively. There would be few or no restrictions on development.

The planning consequences would be severe and while this alternative would allow for development and would provide some short term economic benefits to the county, it is not sustainable and therefore not a viable or acceptable alternative in practice. It would lead to a deterioration in the settlement structures of the county, with a significant shift towards rural rather than urban development. Ultimately it would lead to a loss of population base within key centres and consequently a loss of critical mass for the development of key services and facilities within those centres. Furthermore urban generated housing within the transport corridors would have long term implications for future road development and would compromise re-alignments, or road geometry with adverse risks to road users. Such development is uncontrolled and essentially developer-led but without the key infrastructure in place. This option would result in the development of the county through market

forces in an unsustainable manner. This scenario takes a short term view of developing the county with no consideration of the long term negative environmental consequences.

The environmental consequences potentially are severe. Aspects of the environment such as surface water and groundwater quality, ecology, cultural heritage and landscape would be negatively affected. The dispersal of rural housing and other non agriculture related development in the countryside would lead to a deterioration in ground water quality through the proliferation of septic tanks; surface water quality would be affected through contaminated ground water and its implications on river base flows; habitats and areas of natural interest would be lost or fragmented; archaeology would be impacted through insensitive design and location of development; and finally a deterioration in landscape quality would inevitably ensue.

In summary this weak planning approach would have the following results:

- A deterioration in the rural landscape and natural environment;
- No clearly definable settlement strategy;
- Promoting development at any location throughout the county;
- Serious traffic congestion and disruption to existing residents throughout the county;
- Inadequate environmental measures, leading to a sub-standard environmental quality;
- Impact negatively on the visual amenity and potential of the County area; and
- Domination of market forces resulting in piecemeal development and a weak socio-economic county structure.

Option 2: 'Mixed'

The 'Mixed' approach sets forth a development strategy for the County with mixed emphasis on the location of development. This scenario would provide for a dispersed settlement pattern throughout the countryside while development will be curtailed outside the immediate area of the county's settlements.

The implications would be similar to that of the 'Weak' approach; settlement structure would remain weak because of poor targeting of development in key centres.

Similarly the environmental consequences would be significant, with similar implications for ground and surface water quality, ecology, cultural heritage and landscape and visual amenity.

While this option is approaching a more desirable vision for the development of the County over the plan period, its negative results in terms of planning and environmental protection render it inappropriate for the Plan.

While development in broad terms will be directed to certain areas, a significant level of flexibility will be employed when considering development in other areas, particularly in sensitive parts of the county. In much the same way as the weak approach, the future development of the county would be haphazard and somewhat uncontrolled, allowing others to dictate the location and scale of development.

In summary this mixed planning approach would have the following results:

- Reasonable quantity of development within the county, in line with predictions;
- Poor control on development;
- Lack of long term focus; and
- Poor environmental protection.
- A deterioration in the rural landscape and natural environment;
- No clearly definable settlement strategy;
- Inadequate environmental measures, leading to a sub-standard environmental quality; and
- Impact negatively on the visual amenity and potential of the County area.

Option 3: 'Strong' - Inclusive










A planned approach to the approval of acceptable development within the county will enable development to be targeted to key areas in a sustainable and managed way. This approach ensures that the predicted growth is accommodated in a planned and orderly manner. The plan recognizes the role of existing settlements within the county, while also addresses the rural settlement pattern. Ultimately the core issue of sustainability is addressed and significantly a balance between

development and environmental protection is enshrined in the plan. This approach offers a full spectrum of planned options, thus, this approach offers a long term vision for the County.

The environmental impacts on key environmental receptors such as ground and surface water quality, ecology, landscape and visual amenity and cultural heritage will be minimized. Severely restrictive policies towards development in highly defined sensitive areas such as those listed as NHA, SPA, SAC or indeed those areas highlighted as being sensitive in terms of ground water resource protection or visually sensitive will apply. Under this scenario the following results are envisaged:

- Implementation of Settlement Strategy and promotion of key settlements;
- Key areas for growth will be identified and promoted;
- Strategic or key routes and linkages will be identified and preserved;
- There will be a high level of environmental protection;
- Valuable natural resources such as water quality are protected.

Matrix – Assessment of the Options

	Environmental Assessment of the Alternatives								
									
Option 1 – Weak	✗	✗	✗	✗	✗	✗	✗	✗	✗
Option 2 – Mixed	✗	?	✗	✗	✗	✗	✗	✗	✗
Option 3 – Strong - inclusive	✓	✓	✓	✓	✓	✓	✓	✓	✓

Conclusion

The County Development Plan seeks to balance development with environmental protection and conservation. The matrix shows that Option 1, adopting a Weak approach, allowing development of all areas with little control exerted, will present significant environmental problems and will be contrary to the principles of sustainable development. This option would not allow for the orderly and sustainable development of the county and is therefore not considered as a desirable option for County Longford.

Similarly Option 2, the Mixed approach, is not a desirable option. While restrictions will apply in the immediate hinterland of the County’s settlements, rural development elsewhere would lead to a deterioration in environmental quality throughout the County. Furthermore the settlement structure would weaken as a result.. This option would not realise the long term vision for the County but instead result in poor environmental protection and ad hoc, unsustainable development.

Option 3 allows for planned development and represents a sustainable approach to planning in the County. Development will be focused within zoned and serviced areas. Significant restrictions will be put in place to development in areas designated for environmental purposes such as NHA, SAC and SPA as well as areas of archaeological importance or where threats to natural resources prevail, such as ground and surface waters.

In conclusion a planned approach to the further development of the county incorporating the principles of sustainable development is the option best suited to County Longford.

Part 4 – Measures to be taken to Monitor the Plan

Under the Planning and Development Act, 2000 (as amended), the County Manager is required to prepare a progress report on the implementation of the plan. The environment is a significant consideration and the progress report will include the key findings of the environmental monitoring programme as outlined in this chapter of the SEA.

The implementation of the Plan will be monitored and upon its adoption the local authority will investigate the formation of a review committee to oversee and report on the monitoring aspect of the plan. Once established the committee will gather information from the various departments of the local authority and others whose remit is to monitor environmental receptors, for example the National Parks and Wildlife Service and the Regional Fisheries Board.

Monitoring of the County Development Plan and its implications on the environment is paramount to ensure that the environment of the county is not adversely affected through the plans implementation. Under Article 10 of the SEA Directive monitoring must be carried out of the significant environmental effects directly related to the implementation of the Plan *“in order to, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action.”* The Department of the Environment, Heritage and Local Government Guidelines on SEA recommends that monitoring does not require new research activity; existing sources of information can be used and the task of data collection can be shared.

While considerable environmental data is directly available to the Council such as water quality, recycling rates etc, other sources of information will be accessed to provide a comprehensive view of the effect of the Plan. In this regard the Local Authority will work with other agencies with environmental mandates to gather data for the purposes of monitoring the implementation of the Plan. Therefore, while monitoring specific elements of the environment is not strictly the preserve of the Council, the Council will continue to liaise and work with the Environmental Protection Agency, The National Parks and Wildlife Service, The Fisheries Board, as well as others in the pursuit of environmental conservation and protection through existing environmental monitoring procedures.

It is proposed, in accordance with the Directive, to base monitoring on a series of indicators which measure changes in the environment, especially changes which are critical in terms of environmental quality, for example water or air pollution levels. The indicators have been prepared specifically for the Longford County Development Plan, tailored to reflect the issues of major concern in the area. Guidance has however been provided on the formulation of the indicators from the EPA report *“Environment in Focus 2006 – Environmental Indicators for Ireland”*. The indicators aim to simplify complex interrelationships and provide information about environmental issues which easily understood.

Furthermore, the proposed monitoring programme allows for the collection of data relevant to the ongoing monitoring of the plan’s implementation. It is proposed to investigate the feasibility of forming a monitoring review committee in order to collate and assessed data. The monitoring programme will therefore be expanded upon during the lifetime of the plan and will form the basis of the next baseline assessment for the SEA.

Conclusion

The Strategic Environmental Assessment carried out by Longford County Council during the preparation of the Longford County Development Plan has ensured that any potential significant environmental impacts of the Plan's implementation were identified and that they have been given consideration. Throughout the preparation of the Longford County Development Plan and Environmental Report consultation has taken place which has contributed to the final adopted Plan and enhanced its overall environmental protection dimension.

Although the Plans have now been adopted, the SEA process will continue with the monitoring of environmental impacts of the implementation of the Plan. This will include ongoing monitoring and publication of progress reports over the lifetime of the Plan.