

SEA STATEMENT

OF

VARIATION No. 1

TO THE

**LONGFORD COUNTY DEVELOPMENT PLAN
2009-2015**

STRATEGIC ENVIRONMENTAL ASSESSMENT

for: Longford County Council

Great Water Street,
Longford,
Co. Longford



by: CAAS Ltd.

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SEPTEMBER 2012

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Section 1 Introduction

1.1 Terms of Reference

This is the SEA Statement of the Variation No. 1 to the Longford County Development Plan (CDP) 2009-2015 Strategic Environmental Assessment (SEA).

1.2 SEA Definition

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a plan, or other strategic action, in order to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making on a par with economic and social considerations.

1.3 Legislative Context

Directive 2001/42/EC of the European Parliament and of the Council, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including land use planning.

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

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

¹ Department of Environment, Heritage and Local Government (2004) *Implementation of SEA Directive*

1.4 Content of the SEA Statement

The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the Plan as varied,
- b) how the following have been taken into account during the preparation of the Variation
 - the environmental report,
 - submissions and observations made to the planning authority on the Proposed Variation and Environmental Report, and
 - any transboundary consultations [this is not relevant to this SEA]
- c) the reasons for choosing the Plan as varied, as adopted, in the light of the other reasonable alternatives dealt with, and
- d) the measures decided upon to monitor the significant environmental effects of implementation of the Plan as varied.

1.5 Implications of SEA for the Variation

As a result of the aforementioned legislation, Variation No.1 to the Longford CDP 2009-2015 was required to undergo SEA. The findings of the SEA were expressed in an Environmental Report which accompanied the Proposed Variation on public display. The Environmental Report was updated by way of an Addendum (see Section 3.3) which detailed changes arising from submissions and observations. The Environmental Report was also updated to take account of changes which were made to the Variation on foot of submissions (these changes were minor and would not be likely to result in environmental effects).

On the making of the Variation, the Addendum was used to update the original Environmental Report into a final Environmental Report which is available alongside the Plan as varied. At each

(2001/42/EC): Guidelines for Regional Authorities and Planning Authorities Dublin: Government of Ireland.

stage of the process the Elected Members took into account the findings of the Environmental Report and/or the Addendum as appropriate.

Section 2 How Environmental Considerations were integrated into the Plan as Varied

2.1 Consultations

As environmental authorities identified under the SEA Regulations, the Environmental Protection Agency (EPA), Department of Communications, Energy and Natural Resources (DCENR), the Department of Agriculture, Fisheries and Food (DAFF), the Department of the Environment, Community and Local Government (DECLG) and the Department of Arts, Heritage and the Gaeltacht (DAHG) were all sent SEA scoping notices indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report could be made to the Council. Adjoining planning authorities (Leitrim County Council, Roscommon County Council, Westmeath County Council and Cavan County Council) were also sent scoping notices.

Acknowledgement letters were received from Leitrim and Westmeath County Councils while a written submission was made by the EPA which was taken into account during the formulation of the scope of the SEA and while undertaking the assessment. The submission from the EPA dated 28 March 2012 included a 'Generic EPA Scoping Template' which included information on a variety of issues as well as an SEA Pack which included SEA Process Guidance, an SEA Scoping Checklist, and SEA Process Checklist and information on Wetlands Conservation and Protection.

In addition, a submission was made on the Environmental Report while it was on public display alongside the Proposed Variation. Further information on this is provided under Section 3.

2.2 Environmental Sensitivities

Environmental considerations were integrated into the existing CDP before it was placed on public display for the first time.

Environmental sensitivities were mapped in order to identify which areas of the County would be most sensitive to development and would suffer the most adverse effects if growth

was to be accommodated in those areas unmitigated.

The sensitivities were communicated to the Plan-making team on a regular basis from the outset of both the CDP and Variation preparation processes. Identifying areas with the most limited carrying capacity within the Plan area helped future growth to be diverted away from these areas.

The sensitivities considered by the SEAs of both the CDP and the Variation include the following:

- Designated ecological sites;
- Land cover changes over time;
- Important Stands of Trees
- Soil Type;
- Geological Heritage Sites
- Water Framework Directive (WFD) Risk Assessments for Surface Waters;
- WFD Risk Assessments for Ground Waters;
- WFD Register of Protected Areas;
- EPA River Water Quality Monitoring of Q-Values (Biotic Index Ratings) and Lake Water Quality;
- Aquifer Buffer Zones
- Aquifer Vulnerability;
- Flood events;
- Wastewater and Drinking Water Information;
- Waste Water Treatment capacity and demand;
- Drinking water supply and quality;
- Archaeological Heritage;
- Architectural Heritage; and,
- Landscape Character Areas.

A number of these sensitivities are mapped on Figure 2.1, Figure 2.2 and Figure 2.3.

2.3 Appropriate Assessment and Strategic Flood Risk Assessment

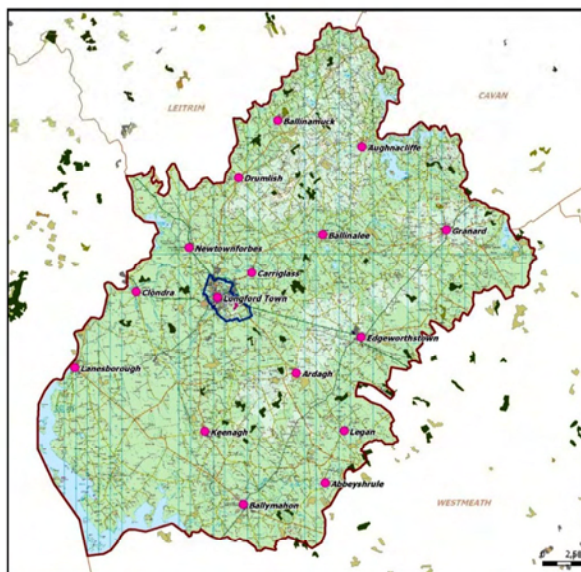
An Appropriate Assessment (AA) process was undertaken alongside the preparation of the Variation which concluded that no Natura 2000 Sites² are deemed to be at risk of likely significant effects of implementing the Variation.

A Strategic Flood Risk Assessment (SFRA) of the Variation was also undertaken which integrated flood considerations into the Variation thereby further contributing towards the Council's compliance with the DEHLG Flood Guidelines.

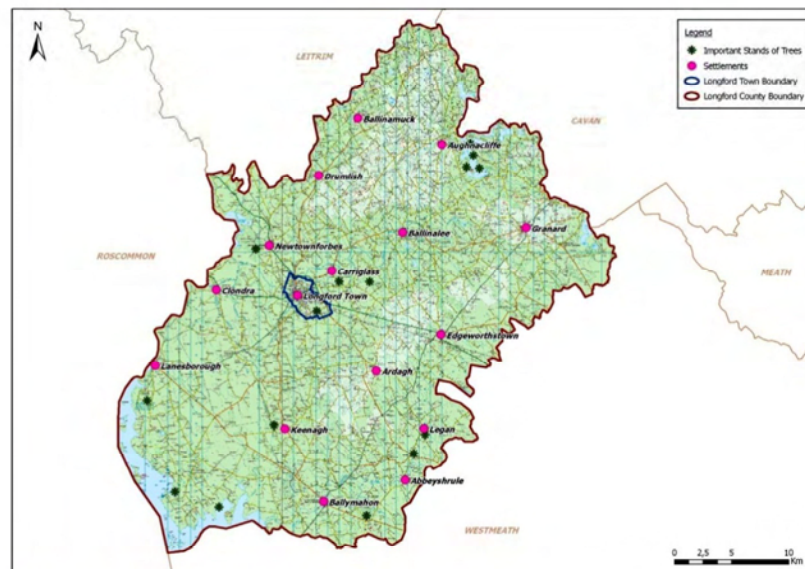
The preparation of the Variation, SEA, AA and SFRA has taken place concurrently and the findings of the AA and SFRA have informed both the Variation and the SEA.

² Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:

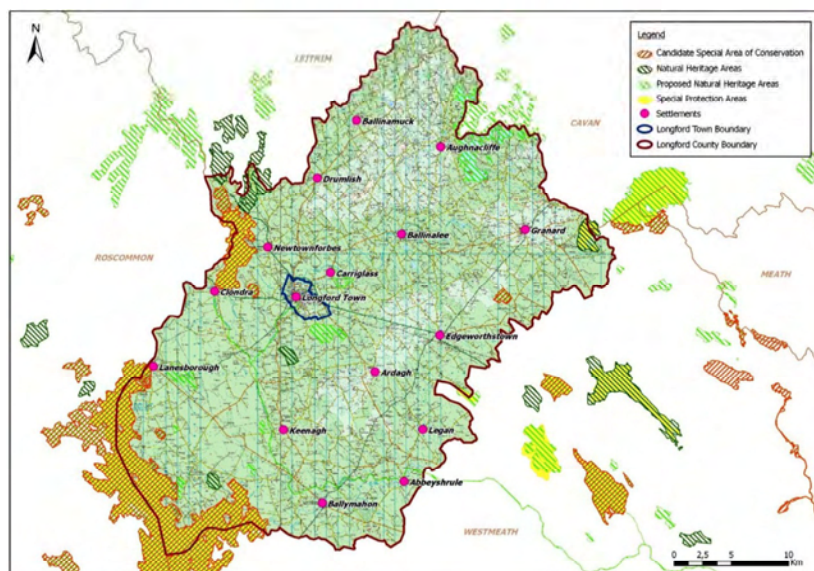
- (a) no alternative solution available,
- (b) imperative reasons of overriding public interest for the plan to proceed; and
- (c) adequate compensatory measures in place.



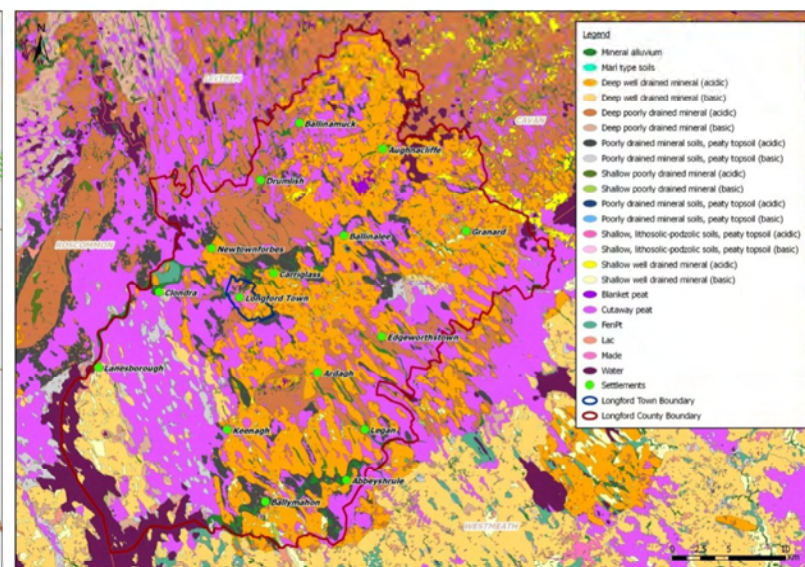
CORINE Land Cover Change 2006



Important Stands of Trees

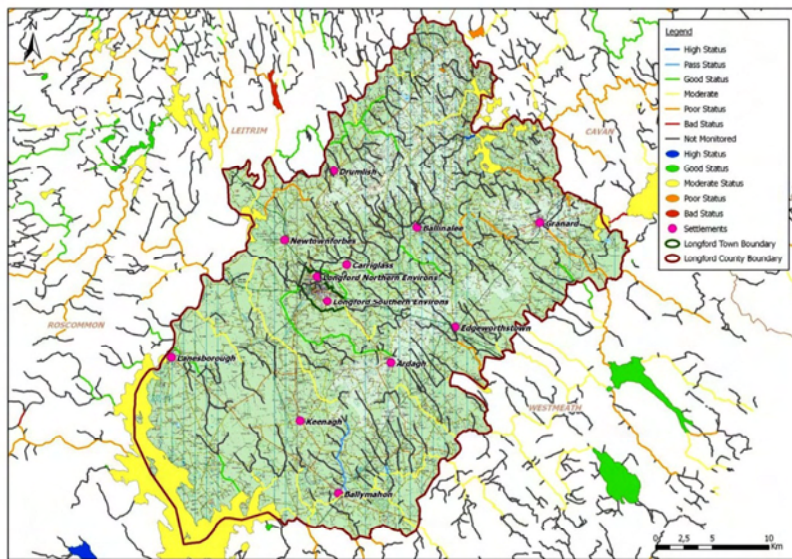


Designated Ecological Sites

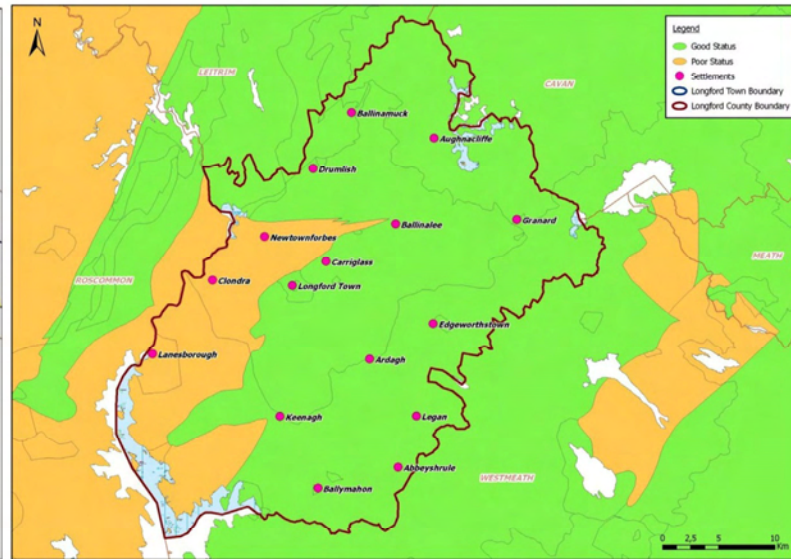


Soils

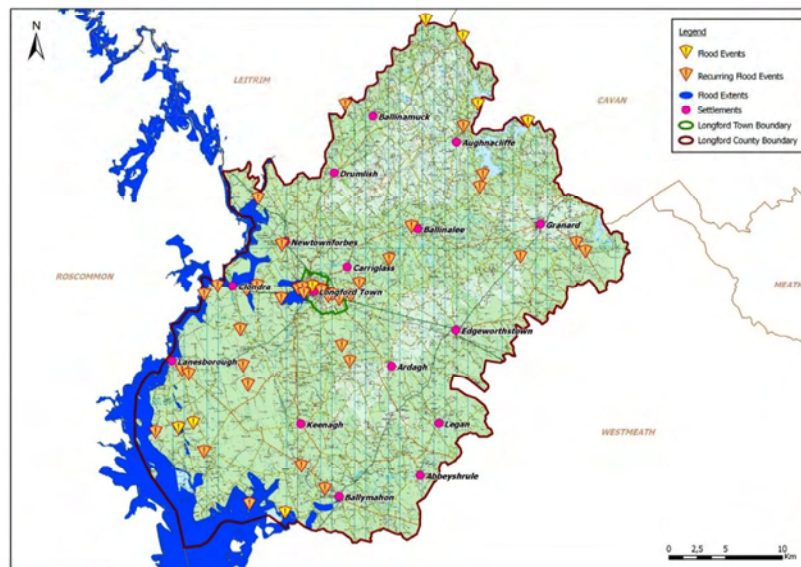
Figure 2.1 Environmental Sensitivities (Set 1 of 3)



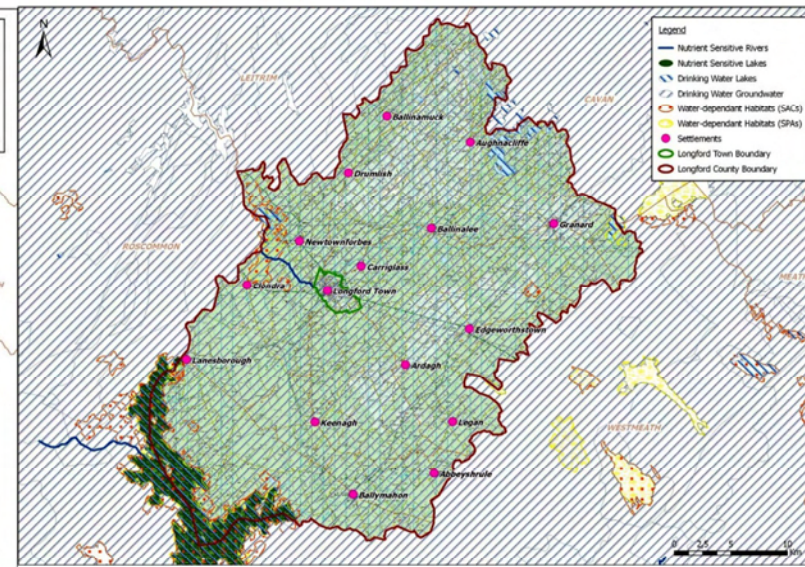
WFD Surface Water Status



WFD Groundwater Status

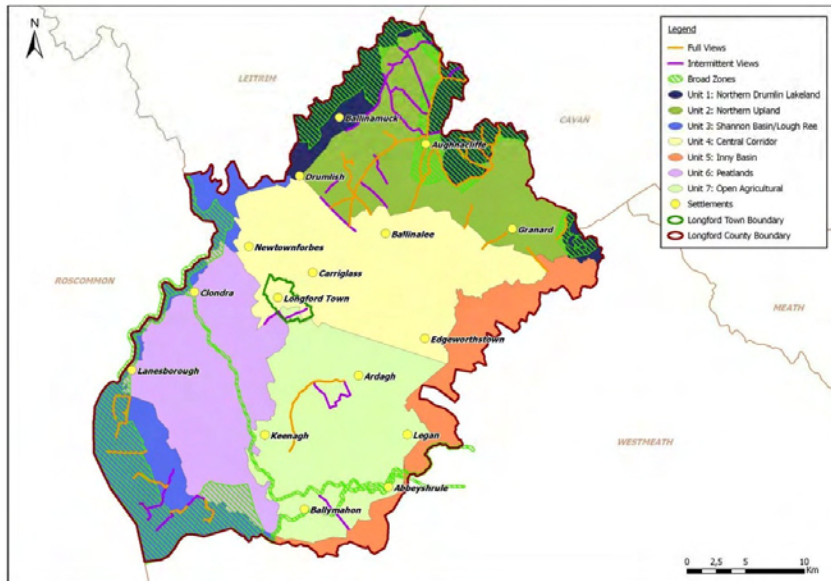


Flood Event and Extent Data

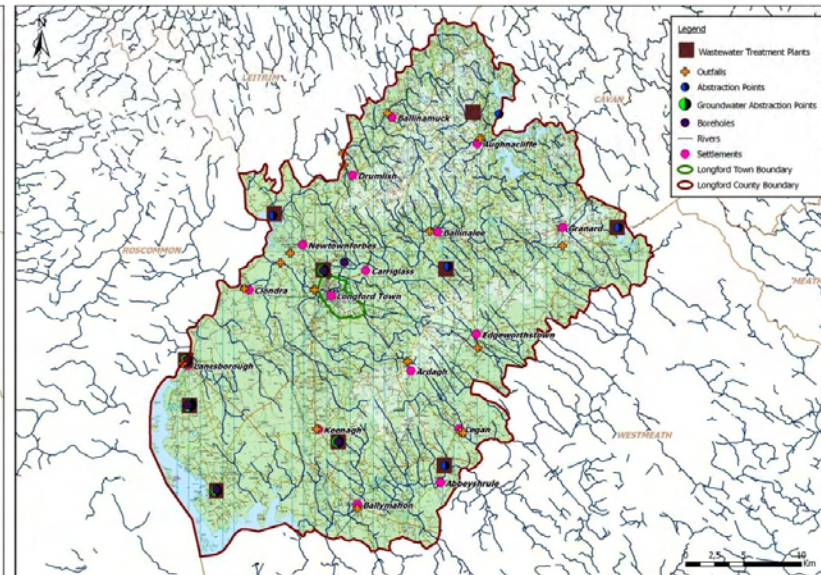


Registers of Protected Areas

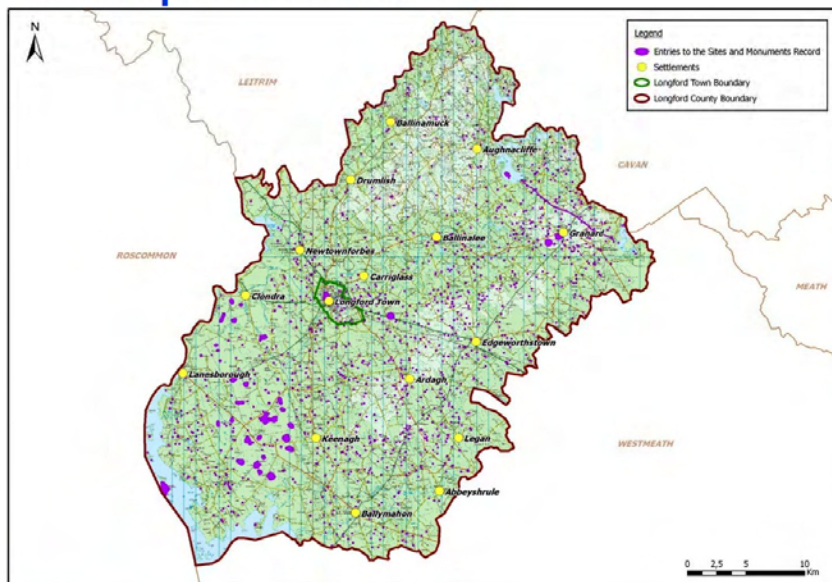
Figure 2.2 Environmental Sensitivities (Set 2 of 3)



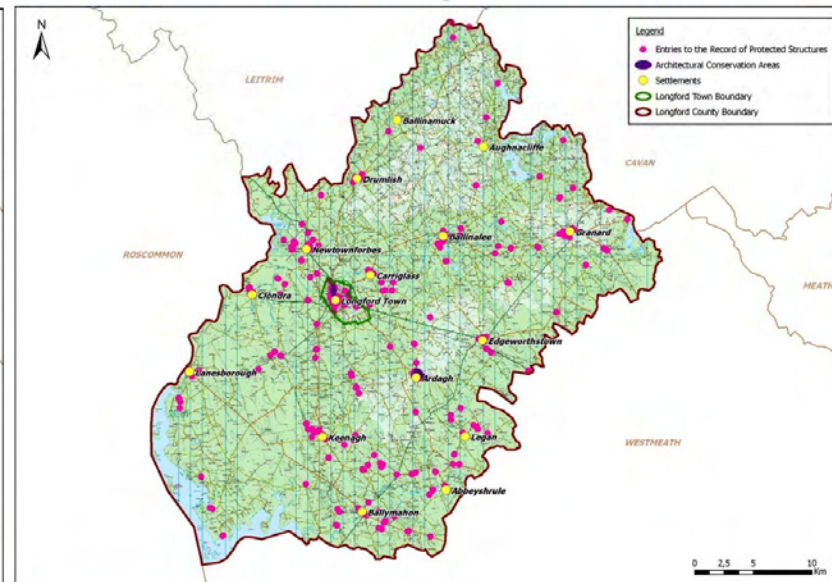
Landscape Character Areas



Wastewater and Drinking Water Information



Archaeological Heritage



Architectural Heritage

Figure 2.3 Environmental Sensitivities (Set 3 of 3)

2.4 Mitigation

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment.

Likely significant beneficial effects of implementing the Development Plan to which the Variation relates have been and will be maximised and potential adverse effects have been and will be avoided, reduced or offset through:

- The consideration of alternatives for the current County Development Plan as part of the SEA for this plan (as provided in the SEA Environmental Report, March 2009) - information on alternatives is provided in Section 3 of this report;
- Mitigation through Communication of Environmental Considerations throughout both the SEA/Plan preparation process for the current Longford County Development Plan 2009-2015 and the SEA/Variation preparation process for the Variation to which this report relates (see Section 2.2 of this report);
- Adherence to individual measures which have been integrated into the current Plan and adherence to additional/amended measures recommended to be integrated into the Plan by this SEA - and accompanying AA and FRA - of the Variation.

Individual measures were integrated into the current County Development Plan 2009-2015 in order to mitigate likely significant effects arising from implementation of the Plan. These measures will also mitigate likely significant effects arising from implementation of the plan as varied. These measures are linked to likely significant effects of implementing the County Development Plan as varied (if unmitigated) on Table 2.1.

In addition to these measures, this SEA - and accompanying AA and FRA - of the Variation recommends a number of additional/amended measures which have been integrated into the Variation and detailed below. These measures

are also linked to likely significant effects (if unmitigated) on Table 2.1.

New Policy WS is inserted as follows:

Where required, public wastewater collection and treatment infrastructure - which fully complies with requirements of the Urban Waste Water Treatment Directive (Council Directive 91/271/EEC of 21 May 1991 concerning urban waste-water treatment) (amended by Directive 98/15/EEC) including the need to provide secondary treatment and other treatment as required - shall be operational and with adequate capacity to accommodate waste water arising from development, prior to developments being occupied. Discharges arising from this collection and treatment shall also comply with the requirements of the Directive.

WS(a)

It is the policy of Longford County Council to investigate the preparation a Water Services Strategic Plan - in compliance with the Water Services Act - for the functional area of the Council. Such a Plan may be prepared jointly with other Water Services Authorities.

Amend Policy WS 2 as follows:

It is the policy of Longford County Council to investigate the feasibility of establishing additional projects in terms of improving existing water supply, establishing new supplies, sewerage mains provision (including the connection of unsewered, areas including individual properties/premises, serviced by septic tanks to the existing and planned sewer network) and improvement of existing treatment plants in the medium and long-term and for their extension to include adjoining residential dwellings.

Amend Policy WS 15 as follows:

The Council shall **consult** implement the relevant recommendations set out in the EPA publication (and any subsequent update) ~~"Urban Wastewater Discharges in Ireland for Population Equivalents Greater than 500 persons - a Report for the Years 2004-5"~~ *Focus on Urban Waste Water Discharges in Ireland* (EPA Office of Environment Enforcement,

2012) ~~in the provision, maintenance and expansion of water treatment systems in the County.~~

Amend Policy FLO 3 as follows:

The Council shall ~~have regard to the provisions of the guidelines issued by the DoEHLG regarding flooding~~ implement the recommendations and provisions of the DEHLG's 2009 Guidelines for Planning Authorities entitled *The Planning System and Flood Risk Management* (and any subsequent update) in the operation of its duties.

Insert new Policy FLO4 as follows:

Where the probability of flooding from rivers is low (less than 0.1%, flood zone C) the developer should satisfy him or herself that the probability of flooding is appropriate to the development being proposed. Among other things, mapping including the OPW's Pluvial and Groundwater Preliminary Flood Risk Assessment mapping should be considered for this purpose.

Amend Policy ENV 7 as follows:

It is the policy of Longford County Council to encourage and promote compliance with the recommendations contained in the Shannon International and North ~~South Western Share~~ International River Basin Management Plans.

Amend Policy ENV 9 as follows:

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

Amend Policy NHB 6 as follows:

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 Directive¹ (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.

No projects giving rise to significant cumulative, direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans or projects)^[1].

Amend Policy NHB 20 as follows:

Proposed large-scale developments, particularly on greenfield sites and in environmentally sensitive areas, shall be assessed in terms of their impact on the biodiversity of the area. ~~All projects and plans arising from this plan will be, and, where appropriate,~~ screened for the need to undertake appropriate assessment under Article 6 of the Habitats Directive ~~in consultation with the National Parks and Wildlife Service.~~

^[1] Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:

- (a) no alternative solution available,
- (b) imperative reasons of overriding public interest for the plan to proceed; and
- (c) adequate compensatory measures in place.

Insert new Policy NHB 22 as follows:

The National Parks and Wildlife Service will be invited to prioritise the preparation of Management Plans for Natura 2000 Sites which are located in the vicinity of the County. This is in order to examine how the Conservation Objectives of the sites can be achieved in the context of the proper planning and sustainable development of the Plan area.

Amend Policies TOU 5, TOU 11 and HS 1 to replace reference to Regional Fisheries Board with Inland Fisheries Ireland

Additional changes as a result of the Flood Risk Assessment are detailed under Appendix II.

Additional changes as a result of the Appropriate Assessment are detailed in the Appropriate Assessment document.

Likely Significant Effect, if unmitigated	Mitigation Measures, including:
Loss of biodiversity with regard to Natura 2000 Sites	Current County Development Plan: NHB 6, NHB 20 Variation: Amendment to NHB 6, Amendment to NHB 20, New Policy NHB 22
Loss of biodiversity with regard to ecological connectivity	Current County Development Plan: NHB 1, NHB 2, NHB 8, NHB 9, NHB 18
Loss of biodiversity with regard to Wildlife Sites and species listed on Schedule 5 of the Wildlife Act 1976	Current County Development Plan: NHB 4, NHB 6, NHB 7
Loss of population involved in land management	Current County Development Plan: Various provisions of Section 3 Housing, 4 Economic Development, 5 Infrastructure and 6 Environment, Heritage and Amenities. Variation: New Policy NHB 22
Spatially concentrated deterioration in human health	Current County Development Plan: ENV 2, ENV 4, ACA 2, ENV 12 Also see measures related to water quality, flooding, waste water treatment and drinking water supply and quality.
Failure to maximise urban consolidation	Current County Development Plan: General Policy 4, CHAR 1, RPS 6
Adverse impacts upon the status of water bodies	Current County Development Plan: ENV 6, ENV 7, ENV 8, ENV 9, ENV 10, WS 9, WS 10, WS 11, SW2 Variation: Amendment to ENV 7, Amendment to Policy ENV 9
Increase in the risk of flooding	Current County Development Plan: FLO 1, FLO 2, FLO 3, SW2 Variation: Insertion of new policy FLO4, Amendment to FLO 3
Failure to provide adequate and appropriate waste water treatment	Current County Development Plan: WS 1, WS 2, WS 3, WS 4, WS 5, WS 13, WS 15 Variation: Insertion of new policy WS, Amendment to WS 2, Amendment to WS 15
Failure to comply with drinking water regulations and serve new development with adequate drinking water that is both wholesome and clean	Current County Development Plan: WS 1, WS 2, WS 3, WS 4, WS 5, WS 8, WS 9, WS 10, WS 11, WS 14 Variation: Insertion of new policy WS
Failure to contribute towards sustainable transport and associated impacts	Current County Development Plan: ROADS 2, PED 1, PED 2, PED 3, PED 4, PED 5, PT 1, PT 2, RL 1, RL 2, RL 3, RL 4, RL 5, RL 6, RL 7, RL 8, BUS 1, BUS 2, BUS 3
Effects on entries to the Record of Monuments and Places and other archaeological heritage	Current County Development Plan: HER 1, HER 5, ARC 1, ARC 2, ARC 5, ARC 6, ARC 9, ARC 10, ARC 11, ARC 12
Effects on entries to the Records of Protected Structures and other architectural heritage	Current County Development Plan: HER 5, ARCH 6, RPS 1, RPS 2, RPS 3, RPS 4, RPS 5, RPS 6, ACA 1, ACA 2
Occurrence of adverse visual impacts	Current County Development Plan: HER 2, LCA 1, LCA 2, LCA 3

Table 2.1 SEA Summary Table: Likely Significant Effects and Mitigation Measures

Section 3 Environmental Report and Submissions & Observations

3.1 Introduction

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

3.2 SEA Scoping Submissions

As environmental authorities identified under the SEA Regulations, the Environmental Protection Agency (EPA), Department of Communications, Energy and Natural Resources (DCENR), the Department of Agriculture, Fisheries and Food (DAFF), the Department of the Environment, Community and Local Government (DECLG) and the Department of Arts, Heritage and the Gaeltacht (DAHG) were all sent SEA scoping notices indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report could be made to the Council. Adjoining planning authorities (Leitrim County Council, Roscommon County Council, Westmeath County Council and Cavan County Council) were also sent scoping notices.

Acknowledgement letters were received from Leitrim and Westmeath County Councils while a written submission was made by the EPA which was taken into account during the formulation of the scope of the SEA and while undertaking the assessment.

The submission from the EPA dated 28 March 2012 included a 'Generic EPA Scoping Template' which included information on a variety of issues as well as an SEA Pack which included SEA Process Guidance, an SEA Scoping Checklist, and SEA Process Checklist and information on Wetlands Conservation and Protection.

3.3 Submissions and Observations

The EPA made a submission on the Proposed Variation and Environmental Report while they were on public display. The information

contained in these submissions was taken into account by the SEA as well as the Appropriate Assessment and Flood Risk Assessment which was undertaken for the Plan.

The submission resulted in the following updates being made to the Environmental Report:

[new text in green; deleted text in ~~strikethrough~~]

- I. To add the following text to Section 4.6.2 of the SEA ER:

Article 4.7 of the WFD Directive states that Member States will not be in breach of the Directive when:

- failure to achieve good groundwater status, good ecological status or, where relevant, good ecological potential or to prevent deterioration in the status of a body of surface water or groundwater is the result of new modifications to the physical characteristics of a surface water body or alterations to the level of bodies of groundwater, or
- failure to prevent deterioration from high status to good status of a body of surface water is the result of new sustainable human development activities

and all the following conditions are met:

- (a) all practicable steps are taken to mitigate the adverse impact on the status of the body of water;
- (b) the reasons for those modifications or alterations are specifically set out and explained in the river basin management plan required under Article 13 and the objectives are reviewed every six years;
- (c) the reasons for those modifications or alterations are

of overriding public interest and/or the benefits to the environment and to society of achieving the objectives set out in paragraph 1 are outweighed by the benefits of the new modifications or alterations to human health, to the maintenance of human safety or to sustainable development, and (d) the beneficial objectives served by those modifications or alterations of the water body cannot for reasons of technical feasibility or disproportionate cost be achieved by other means, which are a significantly better environmental option.

- II. To update the text under Section 4.6.2.3 of the SEA ER as follows:

Local Authorities including Longford County Council, have prepared the Shannon International and Northwest River Basin Management Plans which are implemented in order to help protect and improve waters in the county and wider RBDs.

- III. To update the text under Section 4.8.1 of the SEA ER as follows:

The most recent Focus on Urban Wastewater Discharges in Ireland (EPA, 2012) The EPA's publication 'Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 Persons a Report for the Years 2005 and 2006' (EPA, 2009) identifies, under Table 2.4 'Summary of the overall compliance of water services authorities in 2009', that, within the administrative area of Longford County Council, there are no agglomerations where nutrient reduction is required but not provided and that there are no agglomerations with secondary treatment that did not meet Urban Waste Water Treatment Directive standards (BOD, COD and TSS). that Longford County Council was fully compliant with the guidance values of the Urban Waste Water Treatment Directive over the period examined.

- IV. To state under Section 7.3 in the SEA ER that:

Interactions between the environmental components are intended to be only identified once on Table 7.3.

To also redesign the table (borders and shading).

3.4 Environmental Report

The Environmental Report and the Proposed Variation were placed on public display in June 2012.

Addendum I to the Environmental Report (which details responses to the submission on the Environmental Report which was made during the period of public display of the Proposed Variation and the Environmental Report) was integrated into the Manager's Report circulated to Elected Members. Addendum I proposed updates to the Environmental Report as a result of submissions, as appropriate.

On adoption of the Variation, Addendum I was used to update the original Environmental Report into a final Environmental Report which is available alongside the adopted Variation. The Environmental Report was also updated to take account of changes which were made to the Proposed Variation on foot of submissions (these changes were minor and would not be likely to result in environmental effects). At each stage of the process the Elected Members took into account the findings of the Environmental Report and/or the Addendum as appropriate.

Section 4 Alternatives and the Plan

4.1 Introduction

Longford County Council in preparing the County Development Plan 2009-2015 undertook a Strategic Environmental Assessment which examined 3 alternative scenarios. The findings of this assessment are provided in Chapter 6 of the SEA Environmental Report (March 2009) which accompanied the County Development Plan 2009-2015 and reproduced in the sections below.

The Variation does not provide for any significant increases in land zoned for development however it does provide for the phasing of already zoned lands, with the application of both Strategic Industrial and Residential Reserve objectives. Decisions relating to the phasing of zoned lands took into account of a number of considerations - economic, technical, social and environmental. The environmental factors were those specifically and exhaustively assessed as the basis for the previous plan and SEA already referred to.

The phasing of land provided for by the Variation - in addition to the existing zoning applied previously - had particular regard to both the capacity of the settlements to contribute towards achieving the objectives of the new Core Strategy - these objectives are consistent with the objectives of the existing Spatial Planning Strategy - as well as opportunities for public or sustainable travel and the availability of existing and planned critical water and waste water infrastructure. Phasing also took into account environmental sensitivities including biodiversity and flora and fauna and flood risk.

Potential adverse effects of implementing the County Development Plan as varied will be mitigated by, inter alia, individual measures which have been integrated into the current Plan and additional/amended measures recommended to be integrated into the Plan by this SEA of the Variation. These measures are identified in Section 2 of this report.

4.2 Option 1 - 'Weak' (Worst Case)

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 served 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 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.

4.3 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;
- Poor environmental protection;
- A deterioration in the rural landscape and natural environment;
- No clearly definable settlement strategy;
- Inadequate environmental measures, leading to a substandard environmental quality; and
- Impact negatively on the visual amenity and potential of the County area.

4.4 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.

4.5 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 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.

4.6 Reasons for choosing the Plan as varied, as adopted, in light of the other reasonable alternatives dealt with

The Variation is consistent with the alternative which was selected for the County Development Plan ('Option 3 Strong Inclusive') and the assessment of alternatives provided in the original SEA Environmental Report and reproduced above does not need to change. This alternative was chosen for the Plan having regard to both:

1. The environmental effects which were identified by the Strategic Environmental Assessment; and,
2. Planning - including social and economic - effects.

Section 5 Monitoring Measures

5.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section and Section 9 of the Environmental Report contain proposals for monitoring the likely significant effects of implementing the Development Plan as varied.

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 Development Plan is achieving its environmental objectives and targets - measures which the Plan can help work towards - whether these need to be reexamined and whether the proposed mitigation measures are being implemented.

5.2 Indicators and Targets

Monitoring is based around indicators which allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives identified in the SEA Environmental Report and used in the assessment. Each indicator to be monitored is accompanied by the target(s) which were identified with regard to the relevant strategic actions.

Table 5.1 overleaf shows the indicators and targets which have been selected for monitoring the likely significant environmental effects of implementing the County Development Plan as varied, if unmitigated.

The Monitoring Programme may be updated to deal with specific environmental issues - including unforeseen effects - as they arise. Such issues may be identified by the Council or identified to the Council by other agencies.

5.3 Sources

Measurements for indicators generally come from existing monitoring sources. Existing monitoring sources exist for each of the

indicators and include those maintained by the Council and the relevant authorities e.g. the Environmental Protection Agency, the National Parks and Wildlife Service and the Central Statistics Office.

The *Development Management Process* in the Council will provide passive monitoring of various indicators and targets on an application by application basis. Where significant adverse effects - including positive, negative, cumulative and indirect - have the potential to occur upon, for example, entries to the RMP, entries to the RPS or ecological networks as a result of the undertaking of individual projects or multiple individual projects such instances should be identified and recorded and should feed into the monitoring evaluation.

5.4 Reporting

A monitoring evaluation report on the effects of implementing the Development Plan is to be prepared in advance of the beginning of the review of the Plan. This report should address the indicators set out below.

The Council is responsible for collating existing relevant monitored data, the preparation of monitoring evaluation report(s), the publication of these reports, the review of indicators and targets and, if necessary, the carrying out of corrective action.

5.5 Thresholds

Thresholds at which corrective action will be considered include:

- The occurrence of flood events;
- Court cases taken by the Department of Arts, Heritage and the Gaeltacht regarding impacts upon archaeological heritage including entries to the RMP;
- Complaints received from statutory consultees regarding avoidable environmental impacts resulting from development which is granted permission under the County Development Plan as varied;
- Boil notices on drinking water; and
- Fish kills.

Table 5.1 Selected Indicators, Targets and Monitoring Sources

Environmental Component	Selected Indicator(s)	Selected Target(s)	Source	Monitoring Frequency
Biodiversity, Flora and Fauna	B1: Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive	B1: Maintenance of favourable conservation status for all habitats and species protected under national and international legislation to be unaffected by implementation of the County Development Plan as varied ³	a) Department of Arts, Heritage and the Gaeltacht report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive b) Consultations with the NPWS.	a) Every 6 years b) At monitoring evaluation - see Section 5.4
	B2: Percentage loss of functional connectivity without remediation resulting from development provided for by the County Development Plan as varied	B2: No significant ecological networks or parts thereof which provide functional connectivity to be lost without remediation resulting from development provided for by the County Development Plan as varied	a) CORINE mapping resurvey b) Development Management Process in the Council	a) Unknown b) Per granted permission; compile at monitoring evaluation - see Section 5.4
	B3i: Number of significant impacts on relevant habitats, species, environmental features or other sustaining resources in Wildlife Sites resulting from development provided for by the County Development Plan as varied	B3i: Avoid significant impacts on relevant habitats, species, environmental features or other sustaining resources in Wildlife Sites resulting from development provided for by the County Development Plan as varied	a) CORINE mapping resurvey b) Development Management Process in the Council c) Consultations with the NPWS.	a) Unknown b) Per granted permission; compile at monitoring evaluation - see Section 5.4 c) At monitoring evaluation - see Section 5.4
	B3ii: Number of significant impacts on the protection of species listed on Schedule 5 of the Wildlife Act 1976	B3ii: No significant impacts on the protection of species listed on Schedule 5 of the Wildlife Act 1976	a) CORINE mapping resurvey b) Development Management Process in the Council c) Consultations with the NPWS.	a) Unknown b) Per granted permission; compile at monitoring evaluation - see Section 5.4 c) At monitoring evaluation - see Section 5.4

³ Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:
(a) no alternative solution available;
(b) imperative reasons of overriding public interest for the plan to proceed; and
(c) adequate compensatory measures in place.

Environmental Component	Selected Indicator(s)	Selected Target(s)	Source	Monitoring Frequency
Biodiversity, Flora and Fauna (continued)	B4: Population of the County involved in land management	B4: Sustain the population of the County involved in land management	Central Statistics Office	Next Census
Population and Human Health	HH1: Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors as identified by the Health Service Executive and Environmental Protection Agency	HH1: No spatial concentrations of health problems arising from environmental factors as a result of implementing the County Development Plan as varied	Consultations with EPA and Health Service Executive	At monitoring evaluation - see Section 5.4
Soil	S1: Area of brownfield lands developed in the County over the lifespan of the Development Plan as varied	S1: Arising from increased levels of brownfield development, a reduced availability of brownfield land in the County (subject to availability on the open market, the demand for such land and the ability for such lands to be sustainably re-used) at the end of the County Development Plan's lifespan	Development Management Process in the Council	Per granted permission; compile at monitoring evaluation - see Section 5.4
Water	W1: Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009)	W1: Not to cause deterioration in the status of any surface water or affect the ability of any surface water to achieve 'good status' ⁴ by 2015	Data issued under the Water Framework Directive Monitoring Programme for Ireland (EPA, 2006)	Unknown

⁴ Good status as defined by the WFD equates to approximately the following in the current national schemes of classification as set out by the EPA:

- *O4* in the biological classification of *rivers*;
- *Mesotrophic* in the classification of *lakes*; and
- *Unpolluted* status in the Assessment of Trophic Status of *Estuaries and Bays* in Ireland (ATSEBI).

Environmental Component	Selected Indicator(s)	Selected Target(s)	Source	Monitoring Frequency
Water (continued)	<p>W2: Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC</p> <p>W3: Number of incompatible developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk</p>	<p>W2: Not to affect the ability of groundwaters to comply with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC</p> <p>W3: Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk in compliance with <i>The Planning System and Flood Risk Management Guidelines for Planning Authorities</i></p>	<p>Data issued under the Water Framework Directive Monitoring Programme for Ireland (EPA, 2006)</p> <p>Development Management Process in the Council</p>	<p>Unknown</p> <p>Per granted permission; compile at preliminary monitoring evaluation - see Section 5.4</p>
Material Assets	<p>M1i: Number of new developments granted permission which can be adequately and appropriately served with waste water treatment over the lifetime of the County Development Plan as varied</p> <p>M1ii: Preparation of a Water Services Strategic Plan - in compliance with the Water Services Act - for the functional area of the Council</p> <p>M2i: Number of non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health as a result of implementing the County Development Plan as varied</p>	<p>M1i: All new developments granted permission to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the County Development Plan as varied</p> <p>M1ii: For the Council to prepare a Water Services Strategic Plan in compliance with the Water Services Act</p> <p>M2i: No non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health as a result of implementing the County Development Plan as varied</p>	<p>Development Management Process in the Council</p> <p>Longford County Council</p> <p>a) EPA The Provision and Quality of Drinking Water in Ireland reports (EPA); b) EPA Remedial Action List; and, c) Longford County Council</p>	<p>Per granted permission; compile at monitoring evaluation - see Section 5.4</p> <p>Detail status of Plan preparation at next monitoring evaluation - see Section 5.4</p> <p>a) Annual/biannual; b) Annual/biannual; c) Council's Water and Waste Services Department to confirm - as appropriate - status of supplies listed on Remedial Action List.</p>

Environmental Component	Selected Indicator(s)	Selected Target(s)	Source	Monitoring Frequency
Material Assets (continued)	M2ii ⁵ : Preparation of a Water Services Strategic Plan - in compliance with the Water Services Act - for the functional area of the Council	M2ii: For the Council to prepare a Water Services Strategic Plan in compliance with the Water Services Act	Longford County Council	Detail status of Plan preparation at next monitoring evaluation - see Section 5.4
Air and Climatic Factors	C1: Percentage of population working within the County travelling to work by public transport or non-mechanical means	C1: An increase in the percentage of the population travelling to work by public transport or non-mechanical means	Central Statistics Office	Next Census
Cultural Heritage	CH1: Percentage of 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) - protected CH2: Percentage of entries to the Record of Protected Structures (and/or their context within the surrounding landscape where relevant) protected	CH1: Protect entries to the Record of Monuments and Places - including Zones of Archaeological Potential (and their context of the above within the surrounding landscape where relevant) CH2: Protect entries to the Record of Protected Structures (and/or their context within the surrounding landscape where relevant)	a) Development Management/ Enforcement Processes in the Council; and b) Consultation with Department of Arts, Heritage and the Gaeltacht. a) Development Management/ Enforcement Processes in the Council; and b) Consultation with Department of Arts, Heritage and the Gaeltacht.	a) Per granted permission/ enforcement action; compile at monitoring evaluation - see Section 5.4 b) Compile at monitoring evaluation - see Section 5.4 a) Per granted permission/ enforcement action; compile at monitoring evaluation - see Section 5.4 b) Compile at monitoring evaluation - see Section 5.4

⁵ Indicator and Target M2ii are the same as Indicator and Target M1ii

Environmental Component	Selected Indicator(s)	Selected Target(s)	Source	Monitoring Frequency
Landscape	L1: Number of complaints received from statutory consultees regarding avoidable impacts on the landscape - especially with regard to protected views and prospects and broad zones including lakes, rivers, canals and deciduous woodlands - which is granted permission under the County Development Plan as varied	L1: No developments permitted which result in avoidable impacts on the landscape - especially with regard to protected views and prospects and broad zones including lakes, rivers, canals and deciduous woodlands - resulting from development which is granted permission under the County Development Plan as varied	Assessment by the Council	Per granted permission; compile at monitoring evaluation - see Section 5.4