SEA STATEMENT

FOR THE

LONGFORD COUNTY DEVELOPMENT PLAN 2015-2021

STRATEGIC ENVIRONMENTAL ASSESSMENT

for: **Longford County Council**

Great Water Street

Longford

County Longford

by: **CAAS Ltd.**

2nd Floor, The Courtyard

25 Great Strand Street

Dublin 1

FEBRUARY 2015

Table of Contents

Section 1 Introduction 1

1.1 Terms of Reference 1
1.2 SEA Definition 1
1.3 Legislative Context 1
1.4 Content of the SEA Statement 1
1.5 Implications of SEA for the Plan 1

Section 2 How Environmental Considerations were integrated into the Plan 3

2.1 Introduction 3
2.2 Consultations 3
2.3 Communication of environmental sensitivities 3
2.4 Suggestions of Plan provisions to mitigate effects 4

Section 3 Environmental Report and Submissions & Observations 20

3.1 Introduction 20
3.2 SEA Scoping Submissions 20
3.3 Submissions on the Environmental Report 20
3.4 Environmental Report 21

Section 4 Alternatives and the Plan 25

4.1 Introduction 25
4.2 Description of Alternatives 25
4.3 Evaluation of Alternatives 26

Section 5 Monitoring Measures 30

5.1 Introduction 30
5.2 Indicators and Targets 30
5.3 Sources 30
5.4 Reporting 30
5.5 Thresholds 30

Section 1 Introduction

1.1 Terms of Reference

This is the SEA Statement for the Longford County Development Plan 2015-2021 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 (Statutory Instrument Number (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 Regulations have been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (SI No. 200 of 2011) and the Planning and Development (SEA) (Amendment) Regulations 2011 (SI No. 201 of 2011).

Article 7 of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004) as amended requires that Strategic Environmental Assessment is undertaken for the preparation of certain Development Plans.

Where SEA is undertaken, the Regulations require that a Statement available to the public and the competent environmental authorities after the making of a Development Plan. This Statement is referred to as an SEA Statement[1].

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;
b) how the following have been taken into account during the preparation of the Plan:
   - the environmental report,
   - submissions and observations made to the planning authority on the Draft Plan and Environmental Report, and
   - any transboundary consultations [this is not relevant to this SEA]
c) the reasons for choosing the Plan 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.

1.5 Implications of SEA for the Plan

SEA has been undertaken and the findings of the SEA are expressed in an Environmental Report, the first published version of which accompanied the Draft Plan on public display. The Environmental Report was updated in order to take account of:

- recommendations contained in submissions; and
- changes to the Draft Plan which were made on foot of submissions.

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

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

Section 2 How Environmental Considerations were integrated into the Plan

2.1 Introduction

Environmental considerations were integrated into the Plan through:

- Consultations with environmental authorities;
- Communication of environmental sensitivities through the SEA and associated Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA); and
- Suggestions of Plan provisions to mitigate effects.

2.2 Consultations

As environmental authorities identified under the Planning and Development (SEA) Regulations, as amended, the following authorities were 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: Environmental Protection Agency, Department of Communications, Energy and Natural Resources, Department of Agriculture, Fisheries and Food, Department of the Environment, Community and Local Government, the Department of Arts, Heritage and the Gaeltacht, Longford Town Council, Cavan County Council, Westmeath County Council, Roscommon County Council and Leitrim County Council. Submissions were made by Leitrim County Council, the Environmental Protection Agency and the Department of Arts, Heritage and the Gaeltacht and these were taken into account during the formulation of the scope of the SEA. Further detail on these submissions is provided under Section 3.2.

In addition, submissions were made on the Draft Plan and SEA Environmental Report while they were on public display (see Section 3.3).

2.3 Communication of environmental sensitivities

2.3.1 Overview

Environmental considerations were integrated into the Draft Plan before it was placed on public display. 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 the Plan preparation process. Identifying areas with the most limited carrying capacity within the Plan area helped future growth to be diverted away from these areas.

Sensitivities included the following:

- CORINE Land Cover Data;
- SPAs, SACs, NHAs, pNHAs and Water Management Units;
- Important Stands of Trees;
- Soil Type;
- Geological Heritage Sites;
- Water Framework Directive Status of Surface Waters;
- 2010 and 2011 Q-Values at Points on Rivers and Lake Water Quality;
- WFD Status of Groundwater;
- Aquifer Buffer Zones;
- Aquifer Vulnerability;
- Entries to the Registers of Protected Area;
- Occurrence of Available Historical Flood Risk Indicators;
- Archaeological Heritage - Entries to the Record of Monuments and Places;
- Architectural Heritage - Entries to the Record of Protected Structures and Architectural Conservation Areas;
- Landscape Character Assessment;
- Roscommon Landscape Values;

- Leitrim Areas of High Visual Amenity and Areas of Outstanding Natural Beauty;
- Cavan Scenic Views and Points Reference; and
- Westmeath High Amenity Areas and Views to be Protected or Improved.

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

In order to identify where most sensitivities within the County occur, a number of the environmental sensitivities listed above were weighted and mapped overlapping each other. Figure 2.4 provides an overlay of environmental sensitivities for the County.

The overlay mapping shows that environmental sensitivities are not evenly distributed throughout the County. The County's western and south western boundaries are extremely and acutely vulnerable. These levels of sensitivity reflect the sensitive nature of the River Shannon and its Loughs which are protected under the Habitats Directive.

Peatland areas, due to their ecological, hydrological and amenity characteristics, present higher levels of sensitivity than most of the surrounding agricultural areas throughout the County. This is particularly the case at Clooneen Bog, Ballykenny-Fisherstown Bog and Brown Bog.

Likewise, lakes in the area show higher levels of sensitivity in comparison to surrounding areas and in addition to Lough Forbes and Lough Ree on the River Shannon in the west of the County include Lough Kinale and Derragh Lough.

The remainder of the County is generally of low and moderate vulnerability.

The occurrence of multiple sensitivities in any location does not preclude development; rather it flags at a strategic level that the mitigation measures - which have already been integrated into the County Development Plan as policies and objectives - will need to be complied with in order to ensure that the implementation of the Plan contributes towards environmental protection.

2.3.2 Appropriate Assessment

A Stage 2 Appropriate Assessment (AA) has been undertaken alongside the preparation of the Plan. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC). The AA concluded that the Plan will not affect the integrity of the Natura 2000 network[2].

The preparation of the Plan, SEA and AA has taken place concurrently and the findings of the AA have informed both the Plan and the SEA. All recommendations made by the AA were integrated into the Plan.

2.3.3 Strategic Flood Risk Assessment

A Strategic Flood Risk Assessment (SFRA) has been undertaken alongside the preparation of the Plan. The requirement for SFRA is provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (DEHLG, 2009).

The preparation of the Plan, SEA and SFRA has taken place concurrently and the findings of the SFRA have informed both the Plan and the SEA. All recommendations made by the SFRA have been integrated into the Plan and the land use zoning contained in the Plan has been informed by flood risk sensitivities.

2.4 Suggestions of Plan provisions to mitigate effects

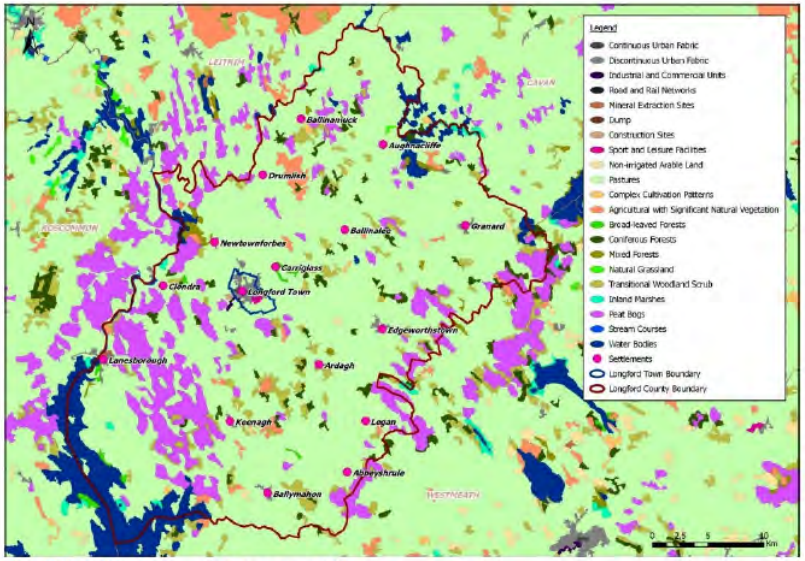
The SEA, AA and SFRA processes suggested various measures for integration into the Plan as provisions (policies and objectives) in order to mitigate the effects of implementing the Plan and to contribute towards environmental protection and sustainable development.

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset

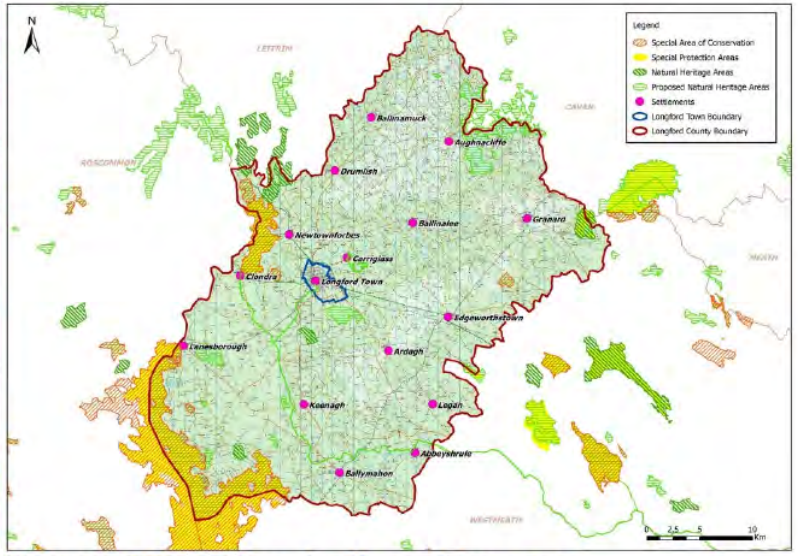
[2] Except as provided for in Section 6(4) of the Habitats Directive, viz. There must be:
(a) no alternative solution available;
(b) imperative reasons of overriding public interest for the plan to proceed; and
(c) adequate compensatory measures in place.

any significant adverse impacts on the environment of implementing the Plan.

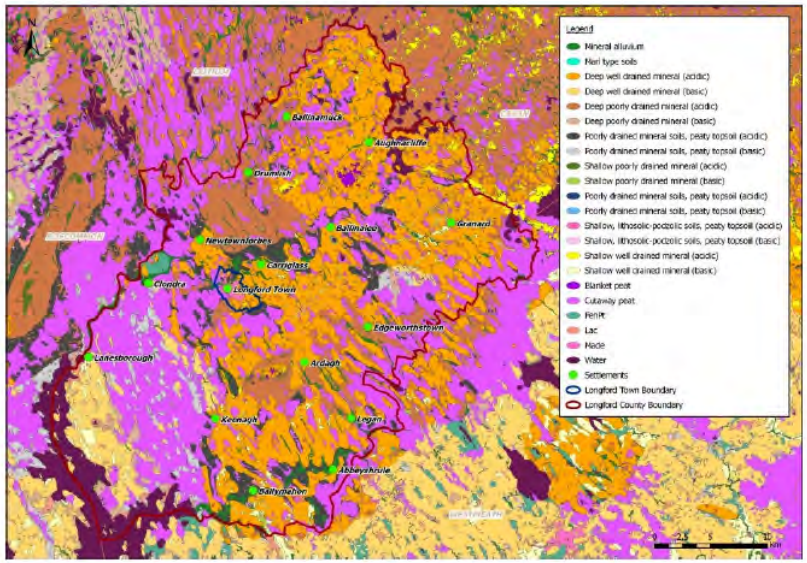
Table 2.1 details key mitigation measure(s) which have been integrated into the Plan under various environmental headings. The integration of these measures into the Plan occurred over a number of iterations and was informed by various communications through the SEA, AA and SFRA processes.



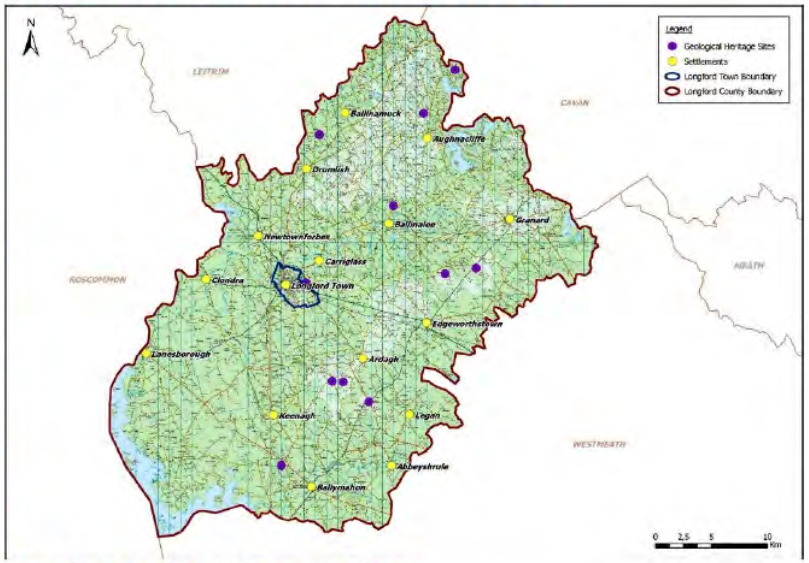
CORINE Land Cover Map



Natura 2000 Sites in the wider area

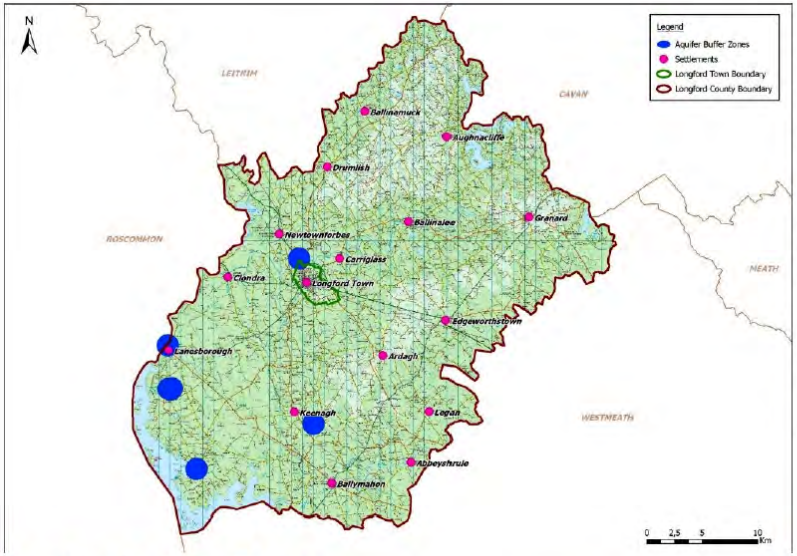


Soil Type

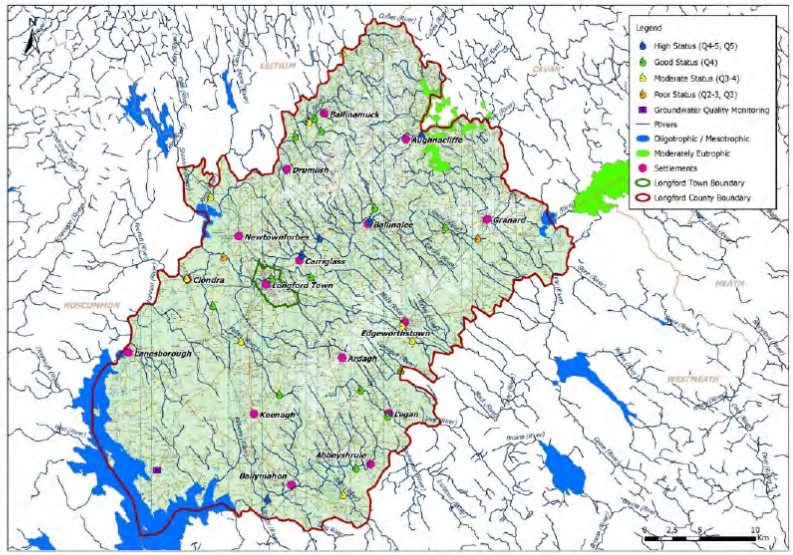


Geological Heritage Sites

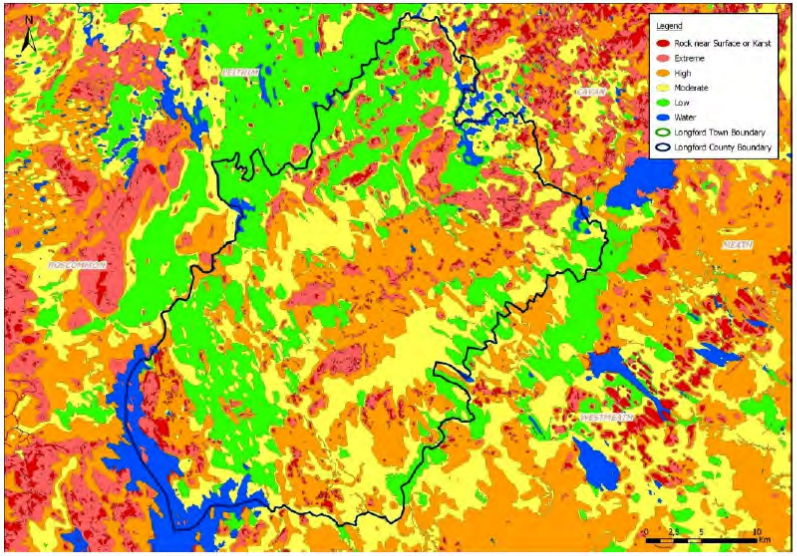
Figure 2.1 Selection of Environmental Sensitivities (Set 1 of 3)



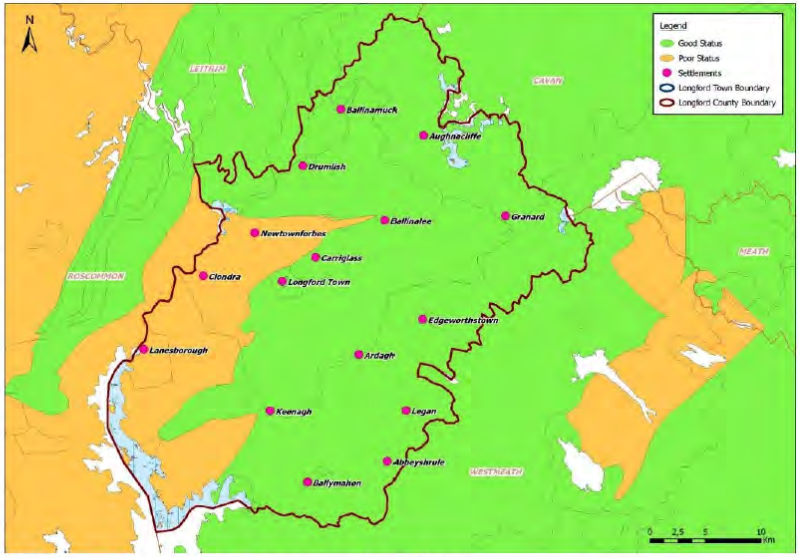
Aquifer Buffer Zones



Water Quality – Rivers and Lakes

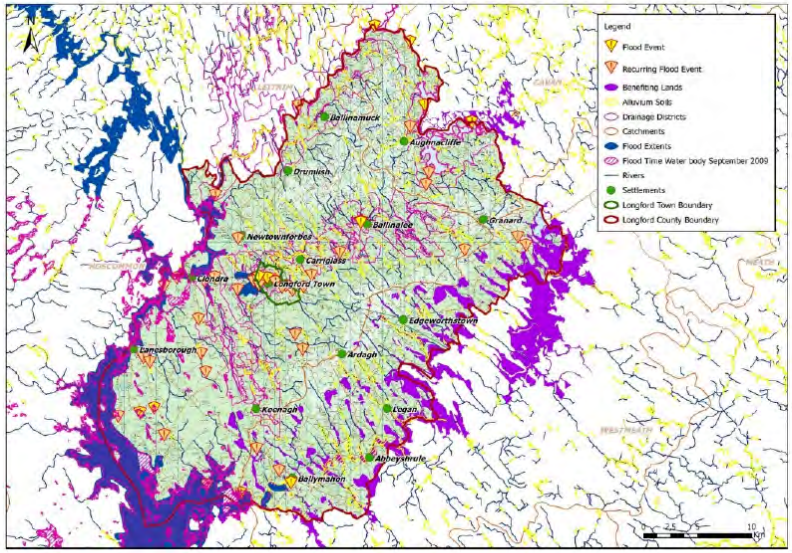


Aquifer Vulnerability

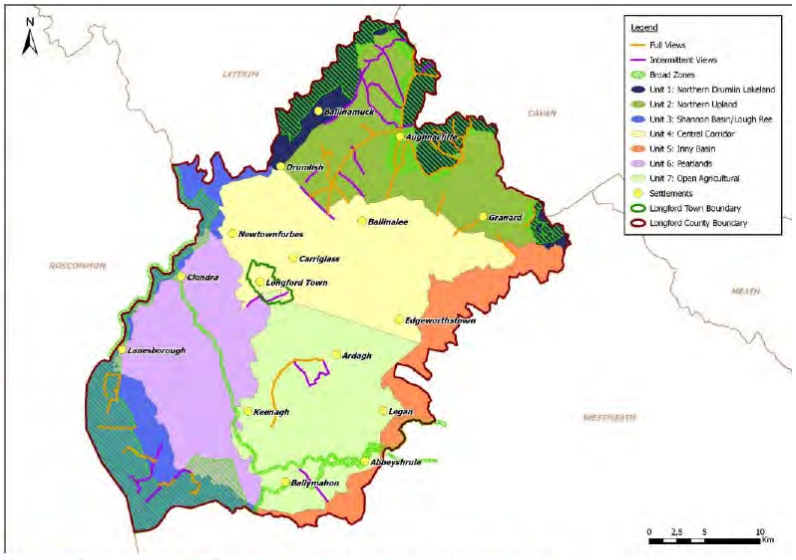


WFD Status of Groundwater

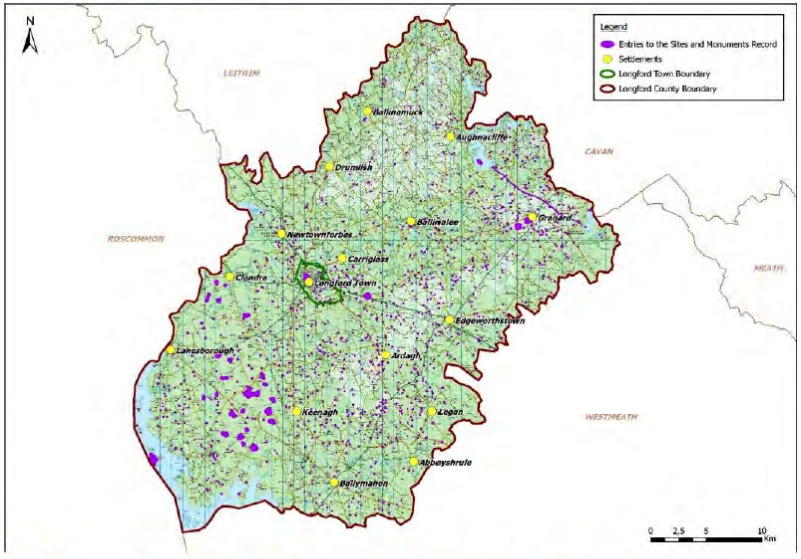
Figure 2.2 Selection of Environmental Sensitivities (Set 2 of 3)



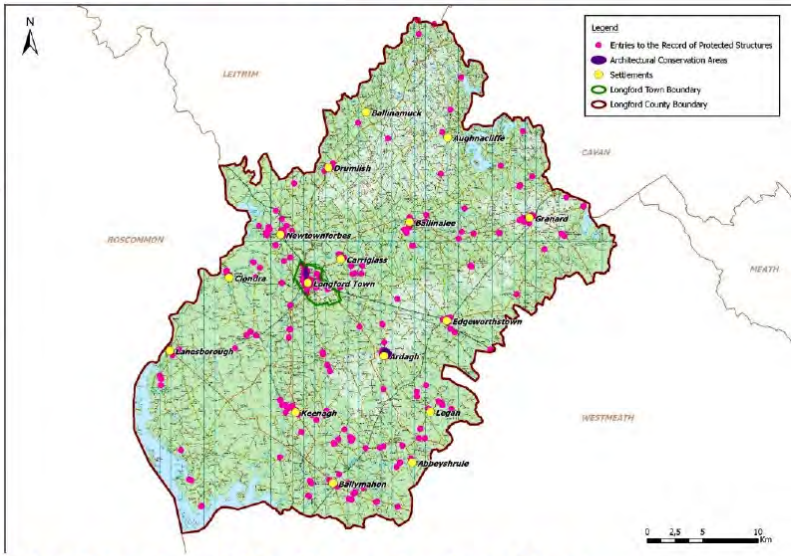
Flood Risk Indicators



Landscape Character Assessment



Archaeological Heritage Designations



Architectural Heritage Designations

Figure 2.3 Selection of Environmental Sensitivities (Set 3 of 3)

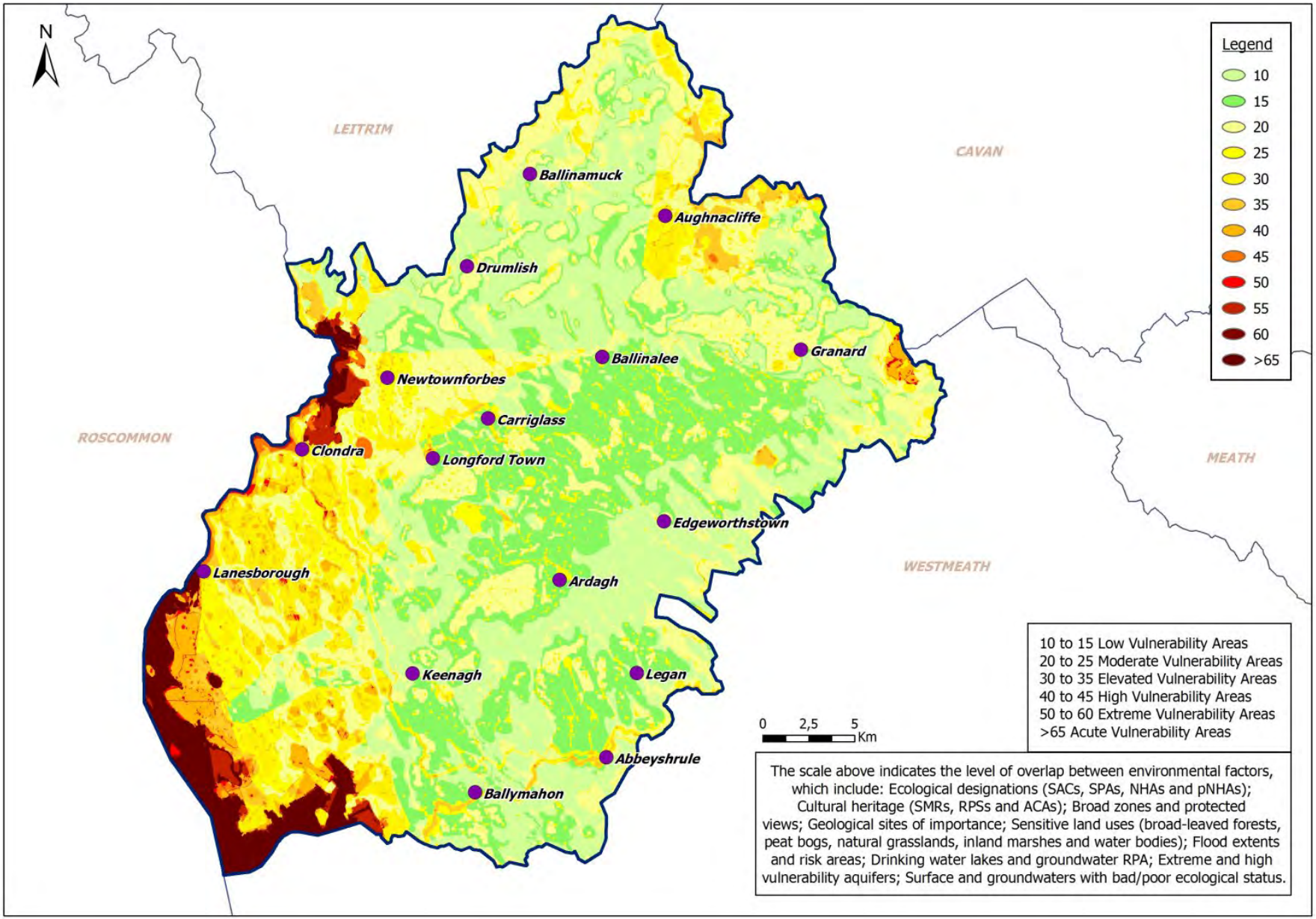


Figure 2.4 Overlay of Environmental Sensitivities
Source: CAAS (2014)

Table 2.1 Mitigation Measure

Text inserted as a result of the SEA, AA and SFRA processes is **green**.

Likely Significant Effect, if unmitigated	Mitigation Measure Reference(s) from the Plan
Loss of biodiversity with regard to Natura 2000 Sites	**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 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 (Birds and Natural Habitats) Regulations 2011 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 (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.)) • Natural Heritage Areas (NHAs), Nature Reserves, and Refuges for Flora or Fauna under the the Wildlife Act, 1976 as amended by Wildlife (Amendment) Act, 2000
	NHB 21 (A): 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.
	NHB 21 (B): All projects and plans arising from this plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive. All such projects and plans will also be required to comply with statutory Environmental Impact Assessment requirements where relevant.
	NHB 23: 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.
	AGR 10: In assessing an application for intensive pig or poultry units, the Planning Authority will have regard to the Good Agricultural Practice for Protection of Waters Regulations (as amended) and require information on the following:- a) Depending on the size of the unit, an E.I.S. and/or Appropriate Assessment may be required. In addition an Integrated Pollution Control licence may be required from the Environmental Protection Agency. b) associated improvement works or associated infrastructure, individually or in combination with other plans and projects, are subject to Appropriate Assessment to ensure that there are no likely significant effects on the integrity of any Natura 2000 sites. **c)** The Council will implement the relevant parts of the Planning and Development (Amendment) (No. 2) Regulations 2011 and the European Communities (Amendment to Planning and Development) Regulations 2011 which require planning permission to be applied for where the area impacted by works relating to the drainage or reclamation of a wetland exceeds 0.1 hectares or where such works may have a significant effect on the environment. Such planning applications would need to be supported by an Appropriate Assessment where relevant.

	RE 1: The Council shall prepare, where resources permit, a Renewable Energy Strategy for the County which will support the development of renewable energy production and ancillary facilities in order to enhance the sustainability of the County, promoting a low carbon economy and lifestyle. The Strategy shall be subject to Appropriate Assessment and Strategic Environmental Assessment as relevant.
	RE 6: It will be Council policy to ensure that all proposed renewable energy projects, such as those related to wind or hydroelectric energy, and any associated improvement works or associated infrastructure, individually or in combination with other plans and projects, are subject to Appropriate Assessment to ensure that there are no likely significant effects on the integrity of any Natura 2000 sites.
Loss of biodiversity with regard to ecological connectivity	**NHB 1:** It is an objective of the Council to protect, conserve and enhance the County's biodiversity and natural heritage. This includes wildlife (flora and fauna), habitats, landscapes and/or landscape features of importance to wildlife or which play a key role in the conservation and management of natural resources such as water.
	NHB 2: It is an objective of the Council to encourage and promote the appropriate management and enhancement of the County's biodiversity and natural heritage.
	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 10: 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).
	NHB 19: It is the policy of the Council to encourage investigation into the establishment of wildlife areas and corridors, particularly in the context of educational, recreational and amenity facilities.
Loss of biodiversity with regard to Wildlife Sites and species listed on Schedule 5 of the Wildlife Act 1976	**NHB 4:** It is the policy of the Council to protect important geological or geomorphological sites in the County, including any sites proposed to be designated or designated as Natural Heritage Areas (NHAs).
	NHB 6: see above
	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.
Loss of population of the county involved in land management	Various measures providing for populations in rural and supporting areas
	NHB 23: see above
Spatially concentrated deterioration in human health	**ENV 2:** Any application for planning permission for new development, extension to existing development or intensification or change of use shall be assessed in terms of its potential impact on existing adjacent developments, existing land uses and/or the surrounding landscape. Where such development would have a significant adverse effect on the amenities of the area through pollution by noise, fumes, dust, grit or vibration, or cause pollution of air, water and/or soil, planning permission will not be forthcoming, prior to the proposal and introduction of mitigation measures agreed with the planning authority to eliminate negative environmental impacts or reduce them to an acceptable operating level.
	ENV 4: The Council shall pursue the preparation, establishment and implementation of/compliance with the following documents/regulations, and any future updates, through its Infrastructure Section: • The Waste Management Plan for the Midlands Region • The National Hazardous Waste Plan

	• EU and National legislation on the prevention of Air and Noise Pollution
	ENV 12: The Council, in tandem with the EPA, will seek to ensure that all developments are operated in a manner that does not contribute to deterioration in air quality
	ACA 2: The Council will only normally permit development proposals where the following criteria is met; **a)** The development preserves and enhances the character of the area. **b)** The development is in sympathy with the built form of the area. **c)** The form, scale, materials and detailing of the development respects the characteristics of the area. **d)** Where appropriate, views of importance, including within, into and out of the area are preserved. **e)** Landscape features of significance, including important strands of trees and hedgerows that contribute to the character of the area are protected. **f)** The development shall not result in any environmental problems such as noise or nuisance which would be detrimental to the particular character of the area.
	Also see measures related to water quality, flooding, waste water treatment and drinking water supply and quality.
Damage to the hydrogeological and ecological function of the soil resource; Geology; Failure to maximise urban consolidation	**HOU DS 4:** The Council may promote and encourage development in existing settlements by private, voluntary and co-operative groups where practical and appropriate through the following measures : **a)** Opening up of appropriately zoned previously inaccessible land banks and making this land available to the relevant parties. **b)** Reduction in development charges in order to promote the re-use and/or refurbishment of derelict or run-down properties. **c)** The acquisition of derelict property where it can provide infill and/or reduce negative visual impact, particularly in or adjoining areas designated as being of high amenity or of high scenic value.
	CHAR 1: It is the policy of the Council that areas of vacant, derelict and under-used land within existing built-up areas (Brownfield sites) should be brought into productive use, as an alternative to the use of Greenfield sites which inevitably involves some loss of natural resources.
	RPS 6: It is Council Policy to encourage the rehabilitation, renovation and reuse of existing older buildings/ buildings of architectural merit where appropriate in preference to their demolition and redevelopment.
	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.
Adverse impacts upon the status of water bodies	**ENV 6:** The Council shall seek to protect ground and surface water resources from pollution. To this end, any identified major catchment areas of surface water bodies, capable of use as a potable water resource or other beneficial use and areas of aquifer vulnerability shall be protected. Development of a potentially pollutant nature in these areas and any future areas identified shall be prohibited.
	ENV 7: It is the policy of Longford County Council to encourage and promote compliance with the recommendations contained in the Shannon International and North Western International River Basin Management Plans.
	ENV 8: The Council, where possible, in tandem with the Geological Survey Ireland (GSI) will support the development and implementation of a Groundwater Protection Scheme.
	ENV 9: The Council shall implement the relevant recommendations contained within the 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.
	ENV 10: The Council, where appropriate, shall seek to control and manage any potential point and/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 unsewered properties, forestry activities and the use and discharge of dangerous substances.
	WS 10: 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 4. In these areas it must be demonstrated that development proposals will not have an adverse impact on the proposed water source.
	WS 11: 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 12: Where potential municipal water supplies are identified, it shall be the policy of the Council to restrict potentially pollutant development within a specified distance from the proposed source.
	SW 2: Surface water storage measures shall be provided where it is considered that the surface water run-off levels exceed permissible discharge rates. Storm water run-off design should be carried out in accordance with Sustainable Urban Drainage Standards (SUDS), "Dublin Corporation Stormwater Management Policy Technical Guidelines" and "Greater Dublin Regional Code of Practice for Drainage Works" incorporating "Greater Dublin Strategic Drainage Study, Volume 2, New Developments" or any future updates.
Increase in the risk of flooding	**SFRA 1:** It is the policy of the Council to support, in co-operation with the OPW, the implementation of the EU Flood Risk Directive (2007/60/EC), the Flood Risk Regulations (SI No. 122 of 2010) and the DEHLG/OPW publication Flood Risk Management Guidelines 2009 (and any updated/superseding legislation or policy guidance). The Council will also take account of the North Western and Shannon International Catchment Flood Risk Assessment and Management Studies.
	SFRA 2: The Council will actively work with the CFRAM Programme and catchment based Flood Planning Groups, especially in the east of the County where catchments go beyond the Council's administrative boundary, in the development and implementation of catchment-based strategies for the management of flood risk - including those relating to storage and conveyance. Such strategies would be most important in areas where significant changes in the levels of development are likely to occur and may be informed by monitoring changes in upstream hydrology including those relating to land cover.
	SFRA 3: Protect water bodies and watercourses within the County from inappropriate development, including rivers, streams, associated undeveloped riparian strips, wetlands and natural floodplains. This will include protection buffers in riverine and wetland areas as appropriate. Promote the sustainable management and uses of water bodies and avoid, where possible, culverting or realignment of these features.
	SFRA 4: Where resources are available, the Council will contribute towards the improvement and/or restoration of the natural flood risk management functions of flood plains. Where possible these functions should be aligned with other functions including those relating to recreation and amenity, habitat protection and management of water quality.
	SFRA 5: Maintain and enhance, as appropriate, the existing surface water drainage system in the County, ensure that new developments are adequately serviced with surface water drainage infrastructure and promote the use of Sustainable Drainage Systems in all new developments. Surface water runoff from development sites will be limited to pre-development levels and planning applications for new developments will be required to provide details of surface water drainage and Sustainable Drainage Systems proposals.
	SFRA 6: The Council shall implement the key principles of flood risk management set out in the Flood Risk Management Guidelines as follow: • Avoid development that will be at risk of flooding or that will increase the flooding risk elsewhere, where possible; • Substitute less vulnerable uses, where avoidance is not possible; and • Mitigate and manage the risk, where avoidance and substitution are not possible. Development will not be permitted in flood risk areas, particularly floodplains, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development. Development in areas which have the highest flood risk should be avoided and/or only considered in exceptional circumstances (through a prescribed Justification Test) if adequate land or sites are not available in areas which have lower flood risk. Most types of development would be considered inappropriate in areas which have the highest flood risk. Only water-compatible development such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation and essential transport infrastructure that cannot be located elsewhere would be considered appropriate in these areas.
	SFRA 7: Lower tier plans shall undertake SFRA in compliance with the Flood Risk Management Guidelines and in consultation with the OPW. As part of a Stage 1 SFRA (flood risk identification), the flood risk indicators identified in the SFRA for the County Development Plan as well as any newly available information should be examined in order to determine whether further investigation and Stage 2 SFRA (initial flood risk assessment) is required. This examination should use the Council's GIS database of flood risk indicators which will be kept up to date and will add, as appropriate, new information made available through the CFRAM Programme. Stage 2 SFRAs for lower tier plans will, at a minimum, undertake:

	• A confirmation of the sources of flooding; • An appraisal of the adequacy of the available flood risk indicator information for the settlement; • Consultation with area engineer/local foreman and local knowledge, where available; • Ground truthing of flood risk indicators and site walkovers facilitating the identification of, inter alia, vegetation associated with frequent inundation and micro-topography; • The identification of flood risk zones. The Council shall take into account the findings of the assessments undertaken (including that which may be provided as part of any Stage 3 SFRA, detailed flood risk assessment) during the preparation of the lower tier plans, including those provisions relating to land use zoning.
	SFRA 8: Site-specific Flood Risk Assessment (FRA) is required for all planning applications in areas at risk of flooding, even for developments appropriate to the particular Flood Zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. Further details with regard to the requirements for site-specific FRAs are provided in the Technical Appendices of the Flood Risk Management Guidelines.
	SFRA 9: SFRAs and site-specific FRAs shall provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on 'Assessment of Potential Future Scenarios for Flood Risk Management' (or any superseding document) shall be consulted with to this effect.
	SFRA 10: A detailed site-specific FRA may be requested for projects specified in the County Development Plan. Such projects could include waste water treatment plants, collection networks, drinking water treatment plants, transport infrastructure and water-compatible developments that have the potential to affect the movement of flood waters.
	SFRA 11: Flood risk may constitute a significant environmental effect of a development proposal that in certain circumstances may trigger a sub-threshold EIS. FRA should therefore be an integral part of any EIA undertaken for projects within the County.
	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: It is the policy of the Council to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/ land uses into the appropriate Flood Zone in accordance with the Flood Risk Management Guidelines 2009 (or any superseding document). Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site-specific FRA in accordance with the criteria set out under the Flood Risk Management Guidelines.
	FLO 3: The Council shall implement the recommendations and provisions of the DEHLG/OPW publication Flood Risk Management Guidelines 2009 (or any updated/superseding document) in relation to flood risk management within the County. This will include the following: a) Avoid, reduce and/or mitigate, as appropriate in accordance with the Flood Risk Management Guidelines, the risk of flooding within the flood risk areas indicated on Flood Zones A and B, including fluvial, pluvial and groundwater flooding, and any other flood risk areas that may be identified during the period of the Plan or in relation to a planning application. b) Development proposals in areas where there is an identified or potential risk of flooding (including pluvial and/or groundwater flooding) or that could give rise to a risk of flooding elsewhere may be required to carry out a site-specific FRA, and Justification Test where appropriate, in accordance with the provisions of The Planning System and Flood Risk Management Guidelines. Any FRA should include an assessment of the potential impacts of climate change, such as an increase in the extent or probability of flooding, and any associated measures necessary to address these impacts. c) Development that would be subject to an inappropriate risk of flooding or that would cause or exacerbate such a risk at other locations shall not normally be permitted. Where certain measures proposed to mitigate or manage the risk of flooding associated with new developments are likely to result in significant effects to the environment or European sites downstream, such measures will undergo environmental assessment and Habitats Directive Assessment, as appropriate.
	FLO 4: 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 5: 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.
	FLO 6: Planning applications on lands identified within groundwater and pluvial PFRA areas shall be accompanied by a site-specific FRA that corresponds with that outlined under Chapter 5 'Flooding and Development Management' of the Flood Risk Management Guidelines. Such assessments shall be prepared by suitably qualified experts with hydrological experience and shall quantify the risks and the effects of any necessary mitigation, together with the measures needed or proposed to manage residual risks.
	FLO 7: In the case of lands transected by the outer boundary of Flood Zone A or B, where it can be demonstrated to the satisfaction of the Planning Authority (by more detailed local topographic survey information) that the outer boundary does not reflect local topographical and /or flood path conditions, the Planning Authority may consider the extension of uses allowed in an adjacent land use zone into the Flood Zone area. The proposal will also be subject to the submission of a site-specific FRA and Justification Test as appropriate and the developer satisfying the Planning Authority and him/herself that the probability of flooding is appropriate to the development being proposed and will not increase flood risk elsewhere
	FLO 8: Where Flood Zones have been zoned according to the information contained in a site-specific FRA provided by the land owner this should be noted on the relevant zoning map.
	FLO 9: 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
Failure to provide adequate and appropriate waste water treatment	**WS 1:** To consolidate the provision of basic environmental services in accordance with appropriate programmes outlined, providing an integrated infrastructural base for the physical, economic and social development of the towns and villages in County Longford.
	WS 2: Development shall only be permitted once adequate and appropriate waste water infrastructure is provided. 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 2 (a) It is the policy of Longford County Council to investigate and promote the preparation of 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.
	WS 3: It is the policy of Longford County Council to support the establishment of 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.
	WS 4: It is the policy of the council to support the establishment and implementation of a small water and sewerage scheme programme for Longford County as part of the Rural Water Programme, established for the construction and upgrade of Group Water Schemes, small public water and sewerage schemes, and the taking in charge of Group Water Schemes.
	WS 5: Longford County Council shall promote the extension of existing water supply and wastewater services where required and where resources permit.
	WS 6: The Council shall support 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
	WS 14: The Council shall support the upgrading of Longford Town effluent treatment plant and phased sewerage system improvements shall continue on an on-going basis.
	WS 18: The Council shall implement the relevant recommendations set out in the EPA publication (and any subsequent update) Focus on Urban Waste Water Discharges in Ireland (EPA Office of Environment Enforcement, 2012).

Failure to comply with drinking water regulations and serve new development with adequate drinking water that is both wholesome and clean	WS 1, WS 2, WS 2 (a), WS 3, WS 4, WS 5, WS 6, WS 14 and WS 18: see above
	WS 9: To ensure that the public drinking water supply of the County complies with relevant EU drinking water standards and to support the extension of supply, where necessary and where resources permit, to meet demand.
	WS 10: 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 4. In these areas it must be demonstrated that development proposals will not have an adverse impact on the proposed water source.
	WS 11: 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 12: Where potential municipal water supplies are identified, it shall be the policy of the Council to restrict potentially pollutant development within a specified distance from the proposed source.
	WS 19: 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.
Failure to contribute towards sustainable transport and associated impacts	**ROADS 2:** To provide a road network which is safe and efficient for all road users, cognisant of the requirements of all traffic, including motorised vehicles, pedestrians and cyclists.
	PED 1: The Planning Authority aims to improve the attractiveness and usability of the pedestrian environment of the County, particularly in residential areas, designated settlements and in areas of high amenity.
	PED 2: The Council shall promote the use of alternative transport to the private car through encouraging enhanced pedestrian and cycling facilities in accordance with the principles of sustainable development.
	PED 3: Facilitate the provision of cycleways and footpaths, particularly in conjunction with new housing developments. The Council shall also promote the potential development of long distance walking routes, particularly those with historical and cultural associations and links to other routes in adjacent Counties.
	PED 4: The Council shall promote the organisation of traffic in towns and villages in order to separate motor vehicular, bicycles and pedestrian traffic. This is to be carried out in accordance with the 'National Manual for the provision of Cycle Facilities in Urban Areas', 'The Design Manual for Urban Roads and Streets' and 'The National Cycle Manual'.
	PED 5: The Council shall investigate the provision of dedicated cycle and pedestrian routes along routes of high amenity.
	PT 1: The Council shall promote the facilitation of a public transport system and development patterns that works towards the integration of spatial planning and transport.
	PT 2: The Council shall support the provision of transport initiatives that promote the development of Rural Transport Networks that enhance social inclusion of rural communities.
	RL 1: To facilitate and promote the provision of a fast, efficient and user-friendly rail service which maximises the economic and social potential of County Longford and recognises its strategic location within the Country.
	RL 2: To facilitate the expansion and development of existing and any future proposed rail facilities and supporting infrastructure within the County.
	RL 3: To support the development of intra-regional rail linkages in accordance with Regional policy.
	RL 4: To utilise the existing rail service and promote its use as an alternative mode of transport in line with the principles of sustainable development.
	RL 5: To concentrate development which may be aimed at those commuting to and from Dublin within close proximity of existing rail links and to facilitate, where practical, improved access for pedestrians and cyclists.
	RL 6: To facilitate and promote greater integration of public and private transport modes.
	RL 7: To promote the use of the rail system in relation to the industrial and commercial development of the County.
	RL 8: The heritage value of the entire rail network is acknowledged and, as such, the retention, conservation and enhancement, as appropriate, of this valuable resource is promoted.

	BUS 1: To facilitate and promote the provision of an efficient and user-friendly bus service which maximises the economic and social potential of County Longford and recognises its strategic location within the Country.
	BUS 2: To promote the improvement of bus services to further the principles of social inclusion and sustainable development, including the national rural transport initiatives and potential medical transport initiatives connecting local, regional and national facilities.
	BUS 3: To facilitate the provision of an integrated transport system for the Town and its environs and the County as a whole, with specific investigation into the potential provision of a dedicated bus terminus at Longford and an Urban shuttle service.
Increases in waste levels	**WAS 1:** It is the policy of the Council to facilitate and promote the implementation of the Midlands Waste Management Plan within its functional area.
	WAS 2: It is the policy of the Council to continue to facilitate and promote the provision of civic amenity sites, including "bring centres" for the purposes of providing a collection point for the recycling of domestic waste, subject to siting, location, compatibility with adjacent land uses and other relevant development control criteria
	WAS 3: The Council shall have regard to the Waste Management Plan for the Midlands Region in the implementation, operation and management of schemes and services for the disposal of waste within the County.
	WAS 5: Where considered necessary, the Planning Authority will require Project Construction and Demolition Waste Management Plans as part of applications for development in accordance with "Best Practice Guidelines on the Preparation of Waste Management Plans for Construction and Demolition Projects" (DoEHLG, 2006). Such plans should be submitted for developments above the stated thresholds within these guidelines and as required by the Planning Authority.
Effects on entries to the Record of Monuments and Places and other archaeological heritage	**HER 1:** The Planning Authority shall promote the protection and conservation of heritage sites, artifacts and monuments and the integrity of their setting, as listed and illustrated in the Record of Monuments and Places (see Appendix 7)
	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.
	ARC 1: It is an Objective of the Council to protect known and unknown archaeological areas, sites, structures, monuments and objects in the County. In this regard, development in the vicinity of recorded monuments shall be referred to the Department of the Environment, Heritage and Local Government Development Applications Unit for comment and these considered in the assessment of any application for development. In general, development within a 20m radius of a recorded monument will not be permitted and proposed development within 75 metres discouraged (subject to other policies contained within this Plan).
	ARC 5: It is the policy of the Council to presume in favour of the physical preservation in-situ of archaeological remains and their settings, where appropriate, feasible and in accordance with the proper planning and sustainable development of the County. The approach will be favoured in these circumstances as the most appropriate means of protecting the heritage of the County, in accordance with government policy.
	ARC 6: It is the policy of the Council to strictly control development proposals on unzoned lands which may be detrimental to, any area, site, structure, monument or object of archaeological significance, or detract from, its interpretation and setting. In this regard, the Planning Authority shall seek an assessment - to be carried out by a licensed archaeologist - of developments which may impact on a national or recorded monument, the designated zone of archaeological importance surrounding any monument or other site of archaeological significance within the County. Development will only be permitted where the Council, in consultation with the DoEHLG, considers it acceptable as per the assessment and subject to any necessary mitigation measures proposed to prevent adverse impact on the monument and/or its settings.
	ARC 9: In securing the preservation of the archaeological heritage, the Planning Authority will have regard to the recommendations of the DoEHLG, both in respect of whether or not to grant Planning Permission and in respect of the condition to which permission would, if granted, be subject.

	ARC 10: Where necessary, the Planning Authority may impose, through the Development Management Process, conditions to safeguard that adequate measures are taken to identify and mitigate the archaeological impacts of any development, including where required the completion of a licensed excavation.
	ARC 11: It is policy of the Council to protect the National Monuments as outlined in the table entitled 'Monuments protected under Preservation Orders' (see table overleaf)
	ARC 12: It is policy of the Council to protect the monuments of Archaeological, Historical and Cultural Interest as outlined in the table of the same name (see overleaf), and illustrated on the Map included as part of Appendix 7.
Effects on entries to the Records of Protected Structures, Architectural Conservation Areas and other architectural heritage	**HER 5:** see above
	RPS 1: It is the policy of the Council to ensure the protection of structures included in the Record of Protected Structures generally and in particular by: • Controlling development which would alter the character of protected structures and proposed protected structures • Monitoring the condition of protected structures and proposed protected structures to identify those endangered by neglect, vandalism or unauthorised development and taking appropriate action • Preventing the endangerment of protected structures in the Council's ownership In this regard, the Council shall seek further funding for the upkeep of protected structures within the County.
	RPS 2: It is the policy of the Council to issue Declarations as to the type of works that would affect the character of a protected structure and therefore require planning permission.
	RPS 3: It is the policy of the Council to administer the Department of Arts, Heritage and the Gaeltacht's Structures At Risk Fund, including the assessment of applications, ensuring that the works enhance and do not adversely affect the character of a protected structure and have been carried out in accordance with the conditions of the fund.
	RPS 4: It is the policy of the Council to acquire protected structures, where possible and where economic constraints permit, if this is necessary to protect the structure. On acquiring the structure, to its use or sale shall be considered by the Council.
	RPS 5: It is the policy of the council that applications for development where a protected structure or its setting is likely to be materially affected, will require an assessment in accordance with provisions of Chapter 6 of the Architectural Heritage Protection Guidelines, issued by the DoEHLG (2004 or subsequent update). Planning Applications of this nature will be referred to the DoEHLG development applications unit and other relevant statutory bodies for comment. Any comments received from these bodies shall be taken into account in the consideration of the application.
	RPS 6: It is Council Policy to encourage the rehabilitation, renovation and reuse of existing older buildings/ buildings of architectural merit where appropriate in preference to their demolition and redevelopment.
	ARCH 6: It is policy of the Council that proposals for development to structures included as part of the National Inventory of Architectural Heritage (DoEHLG) and any updated version, maintain and enhance the character of these structures.
	ACA 1: It is the policy of the Council to select and manage Architectural Conservation Areas in the County, as appropriate and ensure the preservation of the character of the Architectural Conservation Area within Ardagh.
	ACA 2: The Council will only normally permit development proposals where the following criteria is met; a) The development preserves and enhances the character of the area. b) The development is in sympathy with the built form of the area. c) The form, scale, materials and detailing of the development respects the characteristics of the area. d) Where appropriate, views of importance, including within, into and out of the area are preserved. e) Landscape features of significance, including important strands of trees and hedgerows that contribute to the character of the area are protected. f) The development shall not result in any environmental problems such as noise or nuisance which would be detrimental to the particular character of the area.
Occurrence of adverse visual impacts	**HER 2:** It is the policy of the Council to update the Heritage Plan over the lifetime of the Development Plan. The Landscape Character Assessment shall be reviewed on an on-going basis and updated where necessary.
	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 6 and as listed in the following tables. 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.
Other	(Green Infrastructure) **AM 1:** It is the policy of the Council to encourage and facilitate, in consultation with relevant stakeholders, the development of green infrastructure that recognises the synergies that can be achieved with regard to the following: • Provision of open space amenities • Sustainable management of water • Protection and management of biodiversity • Protection of cultural heritage Protection of protected landscape sensitivities.
	(Climate Adaptation) **CLI 1:** The Council recognise European and national objectives for climate adaptation and will work with the EPA, the Regional Assembley and neighbouring planning authorities in implementing future Guidance for climate change proofing of land use plan provisions as is flagged in the National Climate Change Adaptation Framework (DECLG, 2012). The Council will integrate as appropriate, the National Climate Change Adaptation Framework and any related Guidelines which may arise during its implementation.
	(Linkages) **AM 2:** It is the policy of the Council to promote linkages between established landmarks and landscape features and views, including recognition of these elements when zoning land and when considering individual development proposals.

Section 3 Environmental Report and Submissions & Observations

3.1 Introduction

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

3.2 SEA Scoping Submissions

3.2.1 Introduction

As environmental authorities identified under the Planning and Development (SEA) Regulations, as amended, the following authorities were 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: Environmental Protection Agency, Department of Communications, Energy and Natural Resources, Department of Agriculture, Fisheries and Food, Department of the Environment, Community and Local Government, the Department of Arts, Heritage and the Gaeltacht, Longford Town Council, Cavan County Council, Westmeath County Council, Roscommon County Council and Leitrim County Council. Submissions were made by Leitrim County Council, the Environmental Protection Agency and the Department of Arts, Heritage and the Gaeltacht and these were taken into account during the formulation of the scope of the SEA.

Further detail on these submissions and how they were taken into account is provided on Table 3.1.

In addition to written submissions, a scoping meeting with the EPA and OPW was held on 22 May 2013 in order to inform the scoping of the SEA, AA and SFRA.

3.3 Submissions on the Environmental Report

The Environmental Protection Agency, Office of Public Works and Department of the Environment, Community and Local Government made submissions on the Draft Plan and associated SEA/AA/SFRA documents while on public display. Subsequently, the Office of Public Works and Department of the Environment, Community and Local Government made submissions on the Proposed Material Alterations and associated SEA/AA documents while on public display.

These submissions resulted in a number of updates being made to the SEA/AA/SFRA documents which are detailed below:

1. To provide specific reference to the following strategic actions in Section 2 of the SEA Environmental Report: the Rural Development Plan; Forestry Development Programme; Draft National Peatland Strategy and associated Review of Raised Bog Natural Heritage Area Network; and the draft National Raised Bog SAC Management Plan.

2. To add a map to the SEA Environmental Report (Figure 4.6) showing Water Management Units and River Basin Districts.

3. To provide maps and text based descriptions of current landscape designations within surrounding counties (Section 4.11.4 and Figures 4.17, 4.18, 4.19 and 4.20 of the SEA Environmental Report).

4. To insert the following into Section 7.3 of the SEA Environmental Report (*'Examples of effects include those which may arise from multiple wind energy / renewable energy developments - note the landscape designations in adjacent counties*

provided at Section 4.11.4. Cumulative effects would have to be taken into account during the preparation of a renewable energy strategy and associated assessments').

5. To include a variety of recommendations in the SFRA for integration into different parts of the Plan – these have been integrated into the adopted Plan.

3.4 Environmental Report

The Draft Plan and accompanying documents (including SEA Environmental Report, AA Natura Impact Report and Strategic Flood Risk Assessment) were placed on public display from Friday 14th February 2014 until Friday April 25th 2014.

SEA recommendations were fully integrated into the Draft Plan.

Responses to submissions made on the Environmental Report during the periods of public display (both of the Draft Plan and Proposed Material Alterations) were integrated into the Chief Executive's Report and circulated to Elected Members.

The Environmental Report was updated in order to take account of recommendations included in the submissions as well as changes which were made to the original Draft Plan that was placed on public display. Changes which were Material Alterations underwent SEA, the findings of which were placed on public display alongside the Material Alterations.

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

On making of the Plan, the original Environmental Report which had been placed on public display alongside the Draft Plan was updated to become a final Environmental Report which is consistent with the adopted Plan.

Table 3.1 SEA Scoping Submissions

No.	Issue Raised	SEA / AA / SFRA Response (edited from Final Scoping Report)
Leitrim County Council		
1.	In general terms it is considered that the Draft Scoping Report highlights the main environmental issues to be addressed in the making of the Plan and in this regard it is considered satisfactory.	This is noted.
2.	Some of the areas that might be considered in more detail in the Scoping Report include: 1. Methodology to be used in formulating the SEA; 2. The consideration of relevant plans and programmes; 3. Securing the aims and objectives of the River Basin Management Plans; 4. Ensuring that the Plan deal appropriately with the legacy of the economic downturn with particular emphasis on unfinished estates, the high unoccupied housing and commercial developments and the creation of sustainable jobs; 5. Provision of key infrastructure; and 6. Cumulative impacts and Inter-relationships between environmental topics	The purpose of the SEA Scoping Report is to help communicate and define the scope of the environmental issues which are to be dealt with by the SEA together with the level of detail to which it is intended to address these issues, as per the SEA Guidelines[3]. 1. Further details on the SEA methodology will be provided in the SEA Environmental Report. 2. Section 4.6 of the Scoping Report addresses the issue of the relationship between the CDP and other plans and programmes which will be expanded upon within the SEA Environmental Report. 3. It is expected that the County Plan will contribute towards securing the aims and objectives of the River Basin Management Plans through its policies and objectives. Appendix I of the Scoping Report details the measures included in the current 2009-2015 CDP (with updates as relevant) which are recommended for inclusion in the new 2015-2021 CDP. Two of these provisions, in particular, reference River Basin Management Plans while various objectives, including those relating to water quality, will contribute towards securing the aims and objectives of the River Basin Management Plans. 4. This is predominantly a planning matter and will be addressed by the plan preparation process. Plan provisions with regard to the issues raised will be evaluated for likely significant environmental effects by the SEA. 5. It is expected that the County Plan will contribute towards the provision of key infrastructure through its policies and objectives. Appendix I of the Scoping Report details the measures included in the current 2009-2015 CDP (with updates as relevant) which are recommended for inclusion in the new 2015-2021 CDP, many of which relate to the provision of key infrastructure which is relevant to the environment. 6. Cumulative impacts and inter-relationships between environmental components are addressed in the Scoping Report and Environmental Report.
Environmental Protection Agency		
1.	You are referred to the Agency's previous submission, dated the 1st May which should be taken into account at this time also. Further to the previous submission, a number of additional comments are made below which should be taken into consideration.	Issues raised in the EPA's previous submission dated 1st May were taken into account in the original version of the Scoping Report, which was sent to the environmental authorities with the SEA scoping notices. All submissions made by the EPA and environmental authorities will be taken into account beyond the finalisation of this document and throughout the SEA, SFRA and AA processes.
2.	The inclusion of Section 3.3.9 Overlay Mapping of Environmental Sensitivities is acknowledged as it clearly shows which areas of the County have overlapping environmental vulnerabilities. It should be ensured that the Plan provides specific policies/objectives and mitigation measures which are robust enough to protect these sensitivities.	The SEA will seek to ensure that the Plan contributes towards the protection of environmental sensitivities within the County.
3.	In Section 4 Key Scoping Issues, in response to the scoping question regarding additional scoping issues to be considered in the SEA, there would be merits in describing the existing green infrastructure linkages/corridor network within the County. The Plan should provide for the protection and where possible the enhancement of the key ecological corridors in	Green infrastructure is the subject of a suggested preliminary mitigation measure (entitled 'Green Infrastructure') included in Appendix I of the Scoping Report. This measure has been updated to take account of stakeholder consultation as a result of the EPA submission. Section 4 'Key Scoping Issues' of the Scoping Report refers to the information which is included in Section 3 of the Scoping Report, which includes a description of the State of the Environment within the

[3] *Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment Guidelines for Regional Authorities and Planning Authorities* (DEHLG, 2004), Page 18 "It is recommended that at the end of the scoping procedure, the plan-making authority should prepare a brief scoping report of its conclusions as to what information is to be included in the environmental report, taking account of any recommendations from the environmental authorities."

	consultation with the NPWS, Inland Fisheries Ireland (IFI) and other stakeholders.	County. As a result of, inter alia, this submission, additional text has been added to Section 3 concerning green infrastructure.
4.	Section 4.5 Alternatives describes some potential SEA Alternatives to be considered during the preparation of the SEA. The proposed Option 1 Ad Hoc Market Driven approach may not be a realistic/reasonable alternative to consider, given that it would likely conflict with the Regional Planning Guidelines, in implementing a 'Core Strategy' approach to sustainable development.	Section 4.5 of the Scoping Report has been updated as a result of this submission to provide clarity.
5.	Consideration should also be given to taking into account recent UK guidance on the preparation of SEA Alternatives: http://www.levett-therivel.co.uk/options.pdf	The requirements of the Directive, transposing legislation, Irish Guidelines and Irish guidance will be taken into account during the preparation of the alternatives. The cited UK guidance will also be considered.
6.	The inclusion in Appendix I of a table showing the mitigation measures from the current plan is noted. There would be merits in summarising how the baseline environment has changed since the previous Plan and associated SEA were carried out. This approach may allow a determination whether existing mitigation measures are appropriate or require further review or inclusion of additional policies/objectives / mitigation measures.	The description of the environmental baseline to be included in the SEA Environmental Report will include a summary of how the baseline has changed since the 2009 SEA was undertaken.
7.	The inclusion of Appendix II: Q-Value Dataset from the EPA is also acknowledged and welcomed.	This is noted.
8.	Further comment will be provided by the Agency upon receipt of the Draft Environmental Report and Plan and associated documents during the next statutory consultation phase of the SEA Process.	This is noted.
9.	*Updated SEA Regulations / Circular* Amending SEA Regulations were signed into Irish law on 3rd May 2011, amending the original SEA Regulations, and should be referenced and integrated into the Plan and SEA process as appropriate: • Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011, (S.I. No. 201 of 2011), amending the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004). The DoECLG Circular (PSSP 6/2011) 'Further Transposition of the EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA)' which should also be referred to and integrated into the Plan. *European Communities (Birds and Natural Habitats) Regulations 2011* The requirements of the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011), should also be taken into account in implementing the Plan. *Environmental Authorities* Under the SEA Regulations (S.I. No. 436 of 2004), as amended by S.I. No. 201 of 2011 notice should be given to the following: • The Environmental Protection Agency • The Minister for the Environment, Community & Local Government • Minister for Agriculture, Marine and	The SEA (and AA and SFRA) will ensure compliance with the following legislation: • The SEA Directive and the Habitats and Birds Directives; • The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004); • The Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (S.I. No. 201 of 2011); • The Planning and Development Acts 2000 to 2011; and, • The European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011). In addition to complying with the legislation, the processes will be undertaken taking into account the following guidance: • *Implementation of SEA Directive (2001/42/EC): Guidelines for Regional Authorities and Planning Authorities*. Department of the Environment, Heritage and Local Government, 2004. • *Further Transposition of the EU Directive 2001/42/EC on Strategic Environmental Assessment (SEA).* DECLG Circular (PSSP 6/2011). • *Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities*. Department of the Environment, Heritage and Local Government, 2009, • *Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*, European Commission Environment DG, 2000, and; • *Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC:* European Commission, 2000 • *Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment*, European Commission, 2013

	Food, and the Minister for Communications Energy and Natural Resources, where it appears to the planning authority that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment • where it appears to the competent authority that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural heritage or to nature conservation, the Minister for Arts, Heritage and Gaeltacht Affairs, and • any adjoining planning authority whose area is continuous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan. A copy of your decision regarding the determination should be made available for public inspection at your offices, local authority website and should also be notified to any Environmental Authorities already consulted.	
Department of Arts, Heritage and the Gaeltacht		
1.	The following corrections should be noted under Section 3.3 State of the Environment, Subsection 3.3.1 • The candidate cSACs are now fully designated SAC's (third paragraph) • The Department is now Arts Heritage and Gaeltacht for NPWS (third paragraph) • NHA's natural heritage sites were transposed into statutory instruments and therefore designated in 2005 Sites for Longford including: Aghnamona bog NHA 422, Cloonageeher Bog NHA, 1423, Forthill Bopg NHA 1448, Lough Kinale and Derragh Lough 985, Mount Jessop Bog NHA 1450 and Rinn River NHA 691 • Figure 3.2 will also need to have the correct designations updated.	The Scoping Report has been revised to take account of the issues raised in this submission.

Section 4 Alternatives and the Plan

4.1 Introduction

One of the critical roles of the SEA was to facilitate an evaluation of the likely environmental consequences of a range of alternatives for the Plan.

Longford County Council in preparing the County Development Plan developed three alternative scenarios which are realistic and capable of implementation.

4.2 Description of Alternatives

The evaluation of the alternatives - which has resulted in the identification of potential effects and informing the selection of a preferred alternative for the Plan – is summarised in Section 4.3.

The alternatives considered are constrained by the provisions of the Regional Planning Guidelines (RPGs);

- A target population growth of 5,603 persons has been allocated to County Longford by the RPGs.
- The RPGs require that 4,924 persons of the allocation is assigned Longford Town; there is no alternative to this requirement. The SEA ER evaluates the various environmental effects of, inter alia, this allocation.
- The RPGs require that the residual balance of 679 persons is distributed across the remainder of the County, having regard to a county settlement strategy. The location of this residual balance is the basis for the following alternatives.

The settlement hierarchy outlined in the RPGs for County Longford is as follows:

- Principal Town: Longford Town
- Key Service Town: Granard
- Service Town: Edgeworthstown
- Local Service Towns: Ballymahon and Lanesboro
- Village Network: Serviced Settlements and Rural Service Settlements

Alternative Scenario 1
This alternative involves the general allocation of the residual 679 persons balance to Longford Town/its immediate surrounding areas. A minimal balance is allocated to other settlements within the county and to rural areas.

Alternative Scenario 2
This alternative involves the general allocation of the residual 679 persons balance to the Open Countryside, to areas outside of existing settlements. A minimal balance is allocated to county settlements other than Longford Town.

Alternative Scenario 3
This alternative involves the allocation of the residual 679 persons balance to both existing settlements (60%) and the Open Countryside (40%[4]).

[4] This figure is an assumption referred to in the RPGs

4.3 Evaluation of Alternatives

4.3.1 Alternative Scenario 1

By generally allocating the residual 679 persons balance to Longford Town/its immediate surrounding areas, many conflicts between the county's most sensitive areas (see Overlay Mapping of Environmental Sensitivities at Figure 2.4) and this balance of development would be avoided.

For biodiversity and flora and fauna this would mean avoiding development in areas with the greatest concentration of Natura 2000 sites thereby contributing towards the protection of these sites. However this alternative would result in higher losses of the extent of non-protected habitats and higher levels of 'soil sealing' in the Longford Town area as a result of the replacement of semi-natural land covers with artificial surfaces.

By limiting the population allocation in smaller settlements and rural areas, there would be a potential threat to the maintenance of the population of the county involved in land management.

The higher population in the Longford Town area would add demand to the waste water and drinking water services however, subject to appropriate upgrades and maintenance, this demand could be served by the Town's waste water treatment plant and drinking water supply. There is always uncertainty associated with the provision of upgrades however mitigation could require adequate and appropriate infrastructure to be in place in advance of new development. The provision of adequate and appropriate waste water services, or lack thereof, would interact with the protection of water quality, biodiversity and flora and fauna and human health.

There are extensive flood risk zones within and surrounding Longford Town which would need to be considered by new development.

By avoiding development in areas with the greatest concentration of Council landscape designations, this alternative would contribute towards the protection of these designations (although it is noted that *Intermittent Views* are identified to the south of the town).

Impacts upon architectural and archaeological heritage – which has been identified throughout the county - would have to be considered on an application by application basis. The greatest potential conflicts would occur in settled areas.

This alternative would be likely to further contribute towards levels sustainable mobility.

4.3.2 Alternative Scenario 2

By generally allocating the residual 679 persons balance to the Open Countryside this alternative provides a heightened degree of uncertainty as to where exactly outside of existing settlements development would occur. New development and associated conflicts could occur in areas ranging from the most sensitive to the least sensitive areas (see Overlay Mapping of Environmental Sensitivities at Figure 2.4).

Provisions would be needed to ensure that inappropriate development is avoided in Natura 2000 sites in the open countryside.

More treated effluent would be dispersed over wider areas within the county. Adequate and appropriate construction and maintenance of on-site treatment systems would be required to ensure that adverse effects upon water quality, biodiversity and flora and fauna, human health do not occur.

'Soil sealing' and loss of non-designated habitats - as a result of the replacement of semi-natural land covers with artificial surfaces - would coincide with new development in the open countryside.

This alternative would help to facilitate the maintenance of the population of the county involved in land management.

There are extensive areas outside of the county's settlements which have been subject to historical flooding or which are at heightened risk of flooding in the future; flood risk would need to be considered by new development.

Higher levels of dispersed, one-off developments across the countryside would have the potential to conflict with Council landscape designations, both individually and cumulatively, if unmitigated.

Impacts upon architectural and archaeological heritage – which has been identified throughout the county - would have to be considered on an application by application basis. The greatest potential conflicts would occur in settled areas.

This alternative would have the potential to conflict with efforts to maximise sustainable mobility levels.

4.3.3 Alternative Scenario 3

This alternative would help to facilitate the maintenance of the population of the county involved in land management.

By generally allocating 60% of the residual 679 persons balance to existing settlements, many conflicts between the county's most sensitive areas (see Overlay Mapping of Environmental Sensitivities at Figure 2.4) and this balance of development would be avoided.

- For biodiversity and flora and fauna this would mean avoiding development in areas with the greatest concentration of Natura 2000 sites thereby contributing towards the protection of these sites. However this alternative would result in higher losses of the extent of non-protected habitats and higher levels of 'soil sealing' within zoned settlements as a result of the replacement of semi-natural land covers with artificial surfaces. It is noted that the settlements of Clondra and Lanesborough are located close to Natura 2000 sites.

- The higher population in the county's various settlements would add demand to the waste water and drinking water services however, subject to appropriate upgrades and maintenance, this demand could be served by the existing infrastructure and services. There is always uncertainty associated with the provision of upgrades however mitigation could require adequate and appropriate infrastructure to be in place in advance of new development. The provision of adequate and appropriate waste water services, or lack thereof, would interact with the protection of water quality, biodiversity and flora and fauna and human health.

- There are extensive flood risk zones within the county's settlements which would need to be considered by new development.

- Impacts upon architectural and archaeological heritage – which has been identified throughout the county - would have to be considered on an application by application basis. The greatest potential conflicts would occur within existing settlements.

- This allocation of population would be likely to further contribute towards levels sustainable mobility.

By generally allocating 40% of the residual 679 persons balance to the Open Countryside this alternative provides a degree of uncertainty as to where exactly outside of existing settlements this development would occur. New development and associated conflicts could occur in areas ranging from the most sensitive to the least sensitive areas.

- Provisions would be needed to ensure that inappropriate development is avoided in Natura 2000 sites in the open countryside.

- Development in the open countryside would disperse treated effluent over wider areas. Adequate and appropriate construction and maintenance of on-site treatment systems would be required to ensure that adverse effects upon water quality, biodiversity and flora and fauna, human health do not occur.

- 'Soil sealing' and loss of non-designated habitats - as a result of the replacement of semi-natural land covers with artificial surfaces - would coincide with new development in the open countryside.

- There are extensive areas outside of the county's settlements which have been subject to historical flooding or which are at heightened risk of flooding in the future; flood risk would need to be considered by new development.

- Higher levels of dispersed, one-off developments across the countryside would have the potential to conflict with Council landscape designations, , both individually and cumulatively, if unmitigated.

- Impacts upon architectural and archaeological heritage – which has been identified throughout the county - would have to be considered on an application by application basis. The greatest potential conflicts would occur in settled areas.

- This allocation of population would have the potential to conflict with efforts to maximise sustainable mobility levels.

4.3.4 Reasons for choosing the Draft Plan in light of the other alternatives dealt with

The Alternative Scenario chosen for public display and adopted for the County Development Plan which has emerged from the planning/SEA process is Scenario 3.

This Scenario contributes towards protection of the environment while conforming in spirit and word with high level planning objectives.

By complying with appropriate mitigation measures - including those which have been integrated into the Plan - potential adverse environmental effects which could arise as a result of implementing this scenario would be likely to be avoided, reduced or offset.

Alternative Scenario 3 has been developed by the Planning Team as the Draft Plan and placed on public display, amended and adopted by the Elected Members having regard to both:

1. The environmental effects which were identified by the SEA and are detailed above; and
2. Planning - including social and economic - effects which also considered by the Council.

Section 3 of this report identifies how the Plan was informed by environmental sensitivities.

The Core Strategy Map from the Plan is provided on Figure 4.1 overleaf.

Figure 4.1 Core Strategy Map from the Plan
Source: Longford County Council (2013)

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 details the measures which will be used in order to monitor the likely significant effects of implementing the Plan.

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

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 which are detailed in the SEA Environmental Report and used in the evaluation. 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 Plan, 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 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.

Internal monitoring of the environmental effects of grants of permission in the Council will provide monitoring of various indicators and targets on a grant of permission by grant of permission[5] 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 stand-alone Monitoring Report on the significant environmental effects of implementing the Plan will 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 the ongoing review of indicators and targets, collating existing relevant monitored data, the preparation of monitoring evaluation report(s), the publication of these reports 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

[5] The likely significant effects of development proposals on environmental sensitivities are further determined during the development management process. By documenting this determination (e.g. whether a proposed development will impact upon a Protected Structure or whether a proposed development can be adequately served with water services) while granting permissions, or at a later date, the requirement to monitor the effects of implementing the Plan can be achieved.

development which is granted permission under the Plan;
- 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 (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 Plan[6]	• Internal monitoring of environmental effects of grants of permission (grant by grant). • 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 (every 6 years). • Consultations with the NPWS (at monitoring evaluation - see Section 5.4).
	B2: Percentage loss of functional connectivity without remediation resulting from development provided for by the Plan	B2: No significant ecological networks or parts thereof which provide functional connectivity to be lost without remediation resulting from development provided for in the Plan	• Internal monitoring of environmental effects of grants of permission (grant by grant). • CORINE mapping resurvey (every c. 5 years).
	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 Plan B3ii: Number of significant impacts on the protection of species listed on Schedule 5 of the Wildlife Act 1976.	B3i: Avoid significant impacts on relevant habitats, species, environmental features or other sustaining resources in Wildlife Sites resulting from development provided for by the Plan B3ii: No significant impacts on the protection of species listed on Schedule 5 of the Wildlife Act 1976	• Internal monitoring of environmental effects of grants of permission (grant by grant). • Consultations with the NPWS (at monitoring evaluation - see Section 5.4).
	B4: Population of the county involved in land management	B4: Sustain the population of the county involved in land management	• CSO Population Data (every c. 5 years).
Population and Human Health	PHH1: Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors resulting from development provided for by the Plan, as identified by the Health Service Executive and Environmental Protection Agency	PHH1: No spatial concentrations of health problems arising from environmental factors as a result of implementing the Plan	• Consultations with EPA and Health Service Executive (at monitoring evaluation - see Section 5.4).
Soil	S1: Soil extent and hydraulic connectivity	S1: To minimise reductions in soil extent and hydraulic connectivity	• Internal monitoring of environmental effects of grants of permission (grant by grant).
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'[7] by 2015	• Internal monitoring of environmental effects of grants of permission (grant by grant). • Data issued under the Water Framework Directive Monitoring Programme for Ireland.
	W2: Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	W2: Not to affect the ability of groundwaters to comply with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	• Internal monitoring of environmental effects of grants of permission (grant by grant). • Data issued under the Water Framework Directive Monitoring Programme for Ireland (multi-annual).

[6] 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.

[7] 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:
- *Q4* in the biological classification of *rivers*; and
- *Mesotrophic* in the classification of *lakes*.

Environmental Component	Selected Indicator(s)	Selected Target(s)	Source (Frequency)
Water	W3: Number of incompatible developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk	W3: Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk in compliance with *The Planning System and Flood Risk Management Guidelines for Planning Authorities*	• Internal monitoring of environmental effects of grants of permission (grant by grant). •
Material Assets	M1: Number of new developments granted permission which can be adequately and appropriately served with waste water treatment over the lifetime of the Plan	M1: All new developments granted permission to be connected to and adequately and appropriately served by waste water treatment over the lifetime of the Plan	• Internal monitoring of environmental effects of grants of permission (grant by grant).
	M2: 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 Plan	M2: 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 Plan	• EPA The Provision and Quality of Drinking Water in Ireland reports (multi-annual). • EPA Remedial Action List (every quarter).
	M3i: Total collected and brought household waste M3ii: Packaging recovered (t) by self-complying packagers	M3i: Minimise increases in and, where possible, reduce household waste generation M3ii: Maximise increases in packaging recovered (t) by self-complying packagers	• EPA National Waste Reports • EPA Ireland's Environment Reports
Air and Climatic Factors	C1: Percentage of population working within the county travelling to work, school or college by public transport or non-mechanical means	C1: An increase in the percentage of the population travelling to work, school or college by public transport or non-mechanical means	• CSO Population Data (every c. 5 years).
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 from adverse effects resulting from development which is granted permission under the Plan	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) from adverse effects resulting from development which is granted permission under the Plan	• Internal monitoring of environmental effects of grants of permission (grant by grant). • Consultation with Department of Arts, Heritage and the Gaeltacht (at monitoring evaluation - see Section 5.4).
	CH2: Percentage of entries to the Record of Protected Structures and Architectural Conservation Areas and their context protected from adverse effects resulting from development which is granted permission under the Plan	CH2: Protect entries to the Record of Protected Structures and Architectural Conservation Areas and their context from adverse effects resulting from development which is granted permission under the Plan	• Internal monitoring of environmental effects of grants of permission (grant by grant). • Consultation with Department of Arts, Heritage and the Gaeltacht (at monitoring evaluation - see Section 5.4).
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 Plan	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 Plan	• Internal monitoring of environmental effects of grants of permission (grant by grant).