

SEA Statement

Introduction

This document is the Strategic Environmental Assessment (SEA) Statement for the Longford Town Development Plan 2009-2015, as required under Article 9(1) of the SEA Directive and with section 13(l) (1) of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 S.I. No. 436. This document identifies how the SEA process was taken into account by, and influenced, the Plan-making process.

Purpose of SEA Statement

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

Therefore the SEA Statement includes the following information:

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

SEA Directive

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

Article 1 of the SEA Directive states:

“The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development, by ensuring that, in accordance with this directive, an environmental assessment is carried out of certain plans and programmes which are likely to have significant effects on the environment.”

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

Summary of SEA Process

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

1) Scoping and Statutory Consultation

Scoping involves an initial assessment of the relevant environmental issues requiring a more detailed assessment and consideration in the preparation of the Plan. By highlighting the issues at an early stage it ensures that the issues are firmly to the forefront when considering each of the Plan's policies and objectives and reduces the possibility of relevant issues not being addressed.

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

The scoping aspect involved consultation with the statutory consultees, affording each an opportunity to comment on the highlighted issues and the proposed methodology. They include:

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

The Scoping Report was circulated to the aforementioned in March 2008.

2) Environmental Assessment and Preparation of Environmental Report

The preparation of an Environmental Report on the likely significant effects on the environment of the Proposed Plan included documenting the following:

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

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

Amendments made to the Draft Plan at each stage of the process were assessed in terms of their environmental impacts and the results were presented to the Elected Members. At each stage of the process the Elected Members were required by legislation to take into account the Environmental Report before the adoption of the Plan.

3) Statutory Consultation on the Draft Plan and the Draft Environmental Report

The Draft Environmental Report and Draft Longford Town Development Plan were made available for public viewing and submissions or observations were invited from the Environmental Authorities, the Prescribed Bodies and the general public from the 11th September 2008 to the 20th of November 2008.

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

The proposed Material Amendments to the Draft Town Development Plan 2009-2015 and to the Draft Environmental Report were put on public display on the 29th of April until the 27th of May 2009.

Following consideration of the submissions the County Manager produced a report on the proposed Material Amendments for deliberation by the Elected Members. Consequently the Longford Town Development Plan 2009-2015 was adopted on the 30th of July 2009 and came into force on the 27th August 2009.

4) Preparation of SEA Statement

This is the final stage in the Strategic Environmental Assessment.

How Environmental Considerations were integrated into the Plan

The environment has been considered during the preparation of the Plan and throughout its development. This was demonstrated and documented in the Environmental Report.

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

- Traffic Congestion;
- Wastewater treatment;
- Flooding; and
- Water supplies.

Traffic Congestion

Transport and congestion issues are a major concern for the local authority and finding ways to address the issue was a significant issue during the preparation of the Plan. The town suffers from poor traffic circulation due to heavy vehicles utilizing the N5. Illegal or double parking and the loading/unloading of goods further exacerbate the problem.

In response, the Town Council engaged specialist consultants to prepare a Land Use and Transportation Study for the town and the recommendations in terms of traffic management have formed the basis of the traffic specific policies within the Plan. Chapters 5 and 7 of the Plan contain specific detail in addressing the issues identified in the LUT Study.

Wastewater Treatment

The existing sewerage treatment facility has a capacity of 20,000 p.e. (population equivalent). The plant is currently running at capacity with industrial sources within the town accounting for approximately 60% of the capacity. The plant was initially designed to facilitate an expansion to 40,000 p.e.

The majority of both foul and surface water sewers in the town are separated, however in certain town centre areas combined sewers are still in operation. The expansion of the sewerage network is currently awaiting Department of the Environment, Heritage and Local Government approval and when completed the Southern area of the town, including Ferefad, Ballymakeegan and Lisduff will be facilitated with both storm and foul water sewerage.

In response a host of measures were proposed at the outset of the Plan's preparation and are detailed in Chapter 5 of the Plan:

Flooding

Flooding in the town has been a persistent problem over recent years. The Office of Public Works (OPW) monitors flooding throughout Ireland and has recorded significant flood events within the town. Flooding is a natural occurrence but it can be heavily influenced by development through increased volume and rate of runoff, reduction in storage capacity (floodplains) and inadequacy of conveyancy systems.

The local authority commissioned a flood study of the River Camlin in 2002. The conclusions drawn from the study include:

- Development in the south west environs is less than desirable and would reduce floodplain capacity resulting in more frequent and severe flooding of the railway.
- River channel cleaning would increase the carrying capacity of the river thereby reducing the flood potential or risk.

- A weir is located in the centre of the town, acting as a major hydraulic control. As a consequence water levels downstream of the weir do not have any influence on water levels upstream. The Shannon River some 5 km away does not exert a flood influence on the Camlin River as far as the town; the influence extends only as far as Ballykenny Bridge, some 4.5 km from the town.

As a result of the issues raised, the Local Authority formulated specific policy in relation to flooding which is presented in Chapter 5 of the Plan.

Water Supplies

The Longford Central Regional Scheme serves Longford Town and outlying districts including Edgeworthstown, Drumlish and Newtownforbes. The main source is Lough Forbes on the River Shannon with a second source augmenting supply from Currygrange Lough (at Corbeagh).

The local authority commissioned a strategic review of Longford Regional Water Supply Scheme in 2005. The review concluded that the existing supply is not capable of supplying the current demand with significant water shortages experienced during the summer months. Obviously as demand grows the situation will worsen.

As a result of this issue being highlighted at the outset of the process, specific policy and objectives have been formulated and are presented in Chapter 5 of the Plan.

Secondly, a number of 'Threats and Trends' were discussed in relation to each of the environmental receptors. Acknowledging the need to address these issues a series of mitigation measures were proposed in order to reduce or indeed eliminate potential impacts. The following were proposed and are included in the Plan.

Proposed responses to 'Threats' raised during the assessment of the existing environment.			
Topic	Identified Threat	Proposed Policy Response	
Human Beings	The Housing strategy covers the entire county of Longford for the period 2007 – 2016 and predicts a growth of approximately 2,193 persons in Longford Town over the plan period amounting to a 26% increase. This will place considerable pressure on the town's infrastructure including water supply, waste water treatment and road network as well as social indicators and the environment.	HS1	The Council will promote and encourage the provision of a broad mix of housing types in appropriately zoned areas in order to cater for the housing needs of the Town over the lifetime of the Plan. This will include the provision of housing for the elderly, persons with disability, lone parents and travelling families (in accordance with the Traveller Accommodation Plan).
		HS 2	The Council will take the following DoEHLG documents into account in the discharging of their duties under this section: "Delivering Homes Sustaining Communities – Policy Statement" (2007) "Quality Housing for Sustainable Communities – Design Guidelines" (2007). Sustainable Residential Development in Urban Areas (DRAFT – and any subsequent update)" and accompanying Urban Design Manual – A Best Practice Guide (2008)
Flora and Fauna	Biodiversity, rare or threatened habitats and species are afforded protection under national and international legislation. It is an imperative that such natural resources are afforded protection for the benefit of future generations. The habitat mapping of the plan area is a significant step in its regard. However land use changes can impact on the long term viability of particular species particular if their habitat range is diminished. This will present a significant challenge over the lifetime of the plan.	HER 2	The Planning Authority shall endeavour to identify important landscapes, streetscapes and habitats and the importance of local character, identity and distinctiveness, in both the natural and built heritage of the Town. This shall include an investigation of the Heritage Plan for the County into locally important and small scale heritage sites. Where these have been identified as important under the Heritage Plan, they shall be afforded the relevant protection.

	<p>NHB 6</p>	<p>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:</p> <ul style="list-style-type: none"> a. Special Areas of Conservation under the Habitats Directive 1 (Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora) b. Special Protection Areas under the Birds Directive (Council Directive 79/409/EEC on the conservation of wild birds) <p>Both the Birds and Habitats Directives have been transposed in Irish law by Ministerial Regulation. The European Communities (Natural Habitats) Regulations, 1997 are the most important of these because they provide for the protection measures and management regime that apply to SPAs and SACs.</p> <ul style="list-style-type: none"> c. Natural Heritage Areas (NHAs), Nature Reserves and Refuges for Flora or Fauna under the Wildlife (Amendment) Act, 2000.
	<p>NHB 7</p>	<p>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</p>
	<p>NHB 1</p>	<p>It is an objective of the Council to protect, conserve and enhance the Town'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.</p>
	<p>NHB 2</p>	<p>It is an objective of the Council to encourage and promote the appropriate management and enhancement of the Town's biodiversity and natural heritage.</p>
<p>Soil and Geology</p>	<p>Land spreading of farm effluent and application of fertilisers in these areas is a delicate balance, given the poor permeability of the soil and the proliferation of water bodies in this area, many of which are protected as European Sites and vulnerable to eutrophication through excessive nitrate run-off from land.</p>	<p>AGRI 4</p>
		<p>To control, through the development management process and the relevant environmental legislation, the spreading of effluent on land in order to protect ground and surface water sources. This will limit spreading to certain times of the year and/or prohibit spreading in certain areas. Best practice guidelines should be adhered to in order to protect residential amenity in the vicinity.</p>
	<p>AGRI 5</p>	<p>The Planning Authority will require adequate provision for the collection, storage and disposal of effluent produced from agricultural developments. Developers are required to comply with relevant Department of Agriculture Guidelines and the Nitrates Regulations in this regard.</p>

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	The key soil issues, which have been identified at the European level, include erosion and desertification, industrial contamination, diffuse pollution including organic waste disposal and air deposition, soil loss through urbanisation, soils and climate change, soil biodiversity and salinisation. The result of this development and changing attitude will result in the publication of the European Soils Directive which is due later this year.	NHB 4	It is the policy of the Council to protect important geological and geomorphological sites in the County, including any sites proposed to be designated as Natural Heritage Areas (NHAs).
		GEO 1	It is the policy of the Council to protect sites of geological importance within the Town, from inappropriate development that may result in the deterioration of the geological feature.
Water Quality	The EPA monitor river water as part of the Water Framework Directive. Implementation of the Water Framework Directive will have significant implications for existing farming practices, settlement strategies, relevant data availability and ultimately water quality itself.	ENV 5	The Council shall incorporate the recommendations contained within any future River Basin District/River Basin Management Plan for the Shannon International River Basin District, in order to facilitate the Water Framework Directive.
		ENV 6	It is the policy of Longford Town Council to encourage and promote compliance with the recommendations contained in the Shannon River Basin Management Plan once complete.
	There are considerable areas which are rated as being of 'extreme' vulnerability. These areas are predominantly in the south of the plan area. Furthermore there are further areas where rock is near the surface or are karst in nature and again these areas are rated as being of extreme vulnerability.	ENV 4	The Council shall seek to protect ground and surface water resources and associated habitats and species 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, such as those identified at Appendix 8, shall be protected. Development of a potentially pollutant nature in these areas and any future areas identified shall be prohibited.
Flooding	Flooding is a recurring problem for the town and measures are required to alleviate the issue.	FLO 1	Mitigation works in accordance with that outlined in the Nicholas O'Dwyer Preliminary Report Review, June 2008 shall be carried out to alleviate flooding implications of existing development and recommendations contained within applied to future development to prevent exacerbation of flood problems in susceptible areas of the Town.
		FLO 3	The area upstream of the Railway Bridge and north of the Strokestown road, defined as the central floodplain area of the River Camlin shall not be considered for any future development. A minimum channel width of 12m shall be maintained in the section of the river channel between Main Street Bridge and the Western Floodplain.

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		FLO 5	Development will not be permitted in the flood plain or any future area identified as a flood plain. Development will be restricted in areas susceptible to flooding. Developers will be required to submit a Flood Risk/Impact Assessment and proposals for a Sustainable Drainage System (SUDS) where a development is in close proximity to the flood plain or an area susceptible to flooding. This shall also apply in areas where it is considered that the proposed development will impact on flooding elsewhere
		FLO 7	The Council shall have regard to the provisions of The Planning System and Flood Risk Management – Consultation Draft Guidelines for Planning Authorities (Environment, Heritage and Local Government – OPW, September 2008) (and any subsequent update).
		FLO 13	Riparian strips of 10 – 15m shall be left by rivers and streams. These shall not be culverted and shall be to encourage the growth of native flora and fauna to preserve and enhance biodiversity and preserve the natural flood regime of the area.
Water Supply	UFW (unaccounted for water) is currently estimated at approximately 60% of total demand. It is recognized that a proportion of this is due to insufficient metering and customer consumption data, but unfortunately much is due to leakage. Metering will be instrumental in helping to source leaks and conserve water levels.	WS 2	To investigate the feasibility of establishing additional projects in terms of improving existing water supply, establishing new supplies, sewerage mains provision and improvement of existing treatment plants in the medium and long-term and for their extension to include adjoining residential dwellings.
		WS 3	Extension of existing water supply and wastewater services shall be carried out where required and where resources permit. Where such extensions are required as a result of a new development, the developers shall be required to pay a contribution towards the cost to the Council of this extension or carry the works out.
Landscape and Visual	Inappropriate scale and type of development at inappropriate or sensitive location.	LS 1	It is the policy of the Council to protect and enhance the Town's landscape and streetscape, by ensuring that development retains, protects and, where necessary, enhances the appearance and character of the existing local landscape and streetscape. Proposed developments which have a detrimental impact on the landscape will not normally be permitted.
		LS 2	It is the policy of the Council to preserve views and prospects as illustrated on the accompanying map as part of Appendix 1. Any development which may impact on same shall be accompanied by an appropriate visual assessment.

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	<p>Longford's position on the River Camlin, coupled with the largely undeveloped Royal Canal, offers an excellent opportunity to develop both water features as public amenities, including the possibility of the extension of the Royal Canal spur into Longford Town.</p>	ILW 1	<p>The Royal Canal and Camlin River are recognised as important amenity and recreational resources and, as such, it is the policy of the Council to preserve, protect and enhance these important resources.</p>
		ILW 2	<p>The Council shall encourage and promote the enhancement, management, protection and the promotion of access to and understanding of the inland waterways of the Town. Walkway development will be promoted, particularly in the vicinity of the Canal and the Camlin River.r.</p>
		ILW 3	<p>The Council shall, where possible and where resources permit, provide additional accesses to the river and canal banks, through the acquisition of land for public rights of way and parking and lay-by facilities, where appropriate. In areas adjacent to canals and rivers where planning permission is sought, conditions may be attached to any consequent grant of permission requiring retention or creation of public access to the waterway in order to facilitate the creation or expansion of walking/cycling routes.</p>
		AM 14	<p>To provide and develop walking and cycling routes throughout the Town, particularly ones linking various areas of public open spaces and amenity in accordance with Appendix 7.</p>
Cultural Heritage	<p>Cultural Heritage, including all its various elements, represents a finite resource, one which must be protected in order to enrich future generations. Thus, development which is deemed to adversely on structures, features, historical areas etc must not be permitted.</p>	HER 1	<p>The Planning Authority shall promote the protection and conservation of heritage sites, monuments, artefacts and historic structures and the integrity of their setting, as listed and illustrated in the Record of Monuments and Places.</p>
		HER 2	<p>The Planning Authority shall endeavour to identify important landscapes, streetscapes and habitats and the importance of local character, identity and distinctiveness, in both the natural and built heritage of the Town. This shall include an investigation of the Heritage Plan for the County into locally important and small scale heritage sites. Where these have been identified as important under the Heritage Plan, they shall be afforded the relevant protection.</p>
		HER 3	<p>Applications for housing developments shall include provision for the naming of estates in Irish or Irish and English and in recognition of the cultural heritage of the area in which they are situated.</p>

	<p>HER 4</p>	<p>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. Developments which materially impinge on the character of the monument will not be permitted</p>	
	<p>ARC 1</p>	<p>It is an objective of the Council to protect known and unknown archaeological areas, sites, structures, monuments and objects in the Town.</p>	
	<p>ARC 6</p>	<p>It is the policy of the Council to strictly control development proposals on lands which may be detrimental to any area, site, structure, monument or object of archaeological significance, or detract from, its interpretation and setting. Development will only be permitted where the Council, in consultation with the DoEHLG, considers it acceptable, in view of its objectives and policies, and where all necessary mitigation has been carried out. Archaeological monitoring and assessment of works shall be required on or within the Zone of Archaeological Potential of a National or Recorded Monument.</p>	
<p>Transport</p>	<p>Transport and congestion issues are a major concern for the Council and finding ways to address the issue will be a significant issue during the preparation of the plan. A one way system operates on Dublin Street, New Street and Ballymahon Street. However, the town suffers from poor traffic circulation due to heavy vehicles utilising the N5. Illegal or double parking and the loading/unloading of goods further exacerbate the problem.</p>	<p>ROADS 7</p>	
		<p>ROADS 10</p>	<p>To seek the development of the urban road network through the planned development of the town and in accordance with the recommendations of the Longford Traffic and Transportation Study 2004 and Longford Land Use and Transportation Study, currently in preparation.</p> <p>It is the policy of the Council to request the provision of specific information on the potential impact of proposed developments on the roads network of the Town. All applications will be required to submit the required roads form as outlined within the Longford Town Council Planning Pack, or any subsequent update. For specific roads requirements in relation to individual development types, please refer to the design standards section associated with that type. All Transport and Traffic Assessment and Road Safety Audits should be carried out in accordance with the Traffic and Transport Assessment Guidelines, 2007, prepared by the National Roads Authority, and any subsequent update.</p>

	ROADS 11	All planning applications within the zone of influence of existing national roads or of planned new national roads, where the proximity of the proposed development to the national road, would result in the breach of the National Roads Authority's design goal for sensitive receptors exposed to road traffic noise, shall identify and implement noise mitigation measures.
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Environmental Report and Submissions & Observations

This section of the Statement details how submissions and observations made to the planning authority were taken into account during the preparation of the plan on the Draft Town Development Plan and Draft Environmental Report.

Submissions and Observations

As stated, there were two periods of public consultation on the Draft Plan and accompanying Environmental Report. Firstly, the Draft Plan and Environmental Report went on display on the 11th of September 2008 and comments/observations/submissions invited. At this stage of the process a total of 31 submissions were received.

Each of the submissions/observations received were assessed and a detailed consideration of the submissions was carried out, culminating in the development of the Manager's Report, furthermore the proposed amendments were assessed in relation to the SEA.

There were significant contributions from the following and these are discussed further in this section of the Statement:

- 1) Office of Environmental Assessment, Environmental Protection Agency, Regional Inspectorate, Inniscarra, Cork.
- 2) Development Applications Unit, Department of the Environment, Heritage and Local Government;
- 3) Longford Heritage Officer.

Arising from a review of these submissions a number of amendments were proposed for inclusion in the Environmental Report and these have been incorporated in the final Strategic Environmental Assessment Environmental Report. A summary of the significant changes is provided below.

1) Environmental Protection Agency

The EPA raised a number of issues relating to the draft Development Plan and Environmental Report. Arising from a detailed review of this submission, a number of amendments were proposed and included.

This submission was made up of three main parts which are outlined below:

- 1) Comments relating to the integration of environmental considerations identified in the Environmental Report.
- 2) Recommendations for the Environmental Report.
- 3) Appendices containing supporting information.

Response

a. Integration of Environmental Considerations within the Plan

The EPA recommended a number of amendments/inclusions in relation to a variety of issues and as a result the following significant additions were included in the Plan.

Water

***ENV 5:** The Council shall incorporate the recommendations contained within any future River Basin District/River Basin Management Plan for the Shannon International River Basin District, in order to facilitate the Water Framework Directive*

***ENV 12:** The Council, where appropriate, shall seek to control and manage any potential point or diffuse sources of pollution with a view towards improving and maintaining good water quality. Such activities include but are not restricted to wastewater and industrial discharges, landfills, quarries, mines, contaminated land, agricultural activities, wastewater from un-sewered properties, forestry activities and the use and discharge of dangerous substances.*

***ENV 13:** Development proposals that involve the physical modification of water bodies, including abstraction of water, shall be considered having regard to the potential effect on habitats and plant and animal species, with particular consideration given to Natura 2000 sites and specific actions proposed where negative impacts are anticipated.*

Drinking Water:

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

WS 7: *'Longford Central' Public Water Supply shall comply with EU standards and shall be upgraded where necessary to comply with same and to ensure that all public drinking water supplies of the Town complies with the relevant EU drinking water standards and to extend supply, where necessary and where resources permit, to meet demand*

Waste Water Treatment:

WS 15: *The Council shall consult the EPA publication (and any subsequent update) 'Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 persons – A Report for the Years 2004 – 2005' in the provision, expansion and maintenance of water treatment systems in the Town.*

Flood Prevention and Management

FLO 5: *Development will not be permitted in the flood plain or any future area identified as a flood plain. Development will be restricted in areas susceptible to flooding. Developers will be required to submit a Flood Risk/Impact Assessment and proposals for a Sustainable Drainage System (SUDS) where a development is in close proximity to the flood plain or an area susceptible to flooding. This shall also apply in areas where it is considered that the proposed development will impact on flooding elsewhere.*

FLO 6: *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 Town Area. In this regard, it is intended to prepare a Flood Risk Assessment within the lifetime of this plan, using existing and published data and adding a predictive element to take account of issues such as the effects of climate change and altering rainfall and climatic patterns.*

FLO 7: *The Council shall have regard to the provisions of The Planning System and Flood Risk Management – Consultation Draft Guidelines for Planning Authorities (Environment, Heritage and Local Government – OPW, September 2008) (and any subsequent update).*

Biodiversity

NHB 15: *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 and where appropriate screened for Appropriate Assessment in consultation with the National Parks and Wildlife Service.*

Landscape/Townscape/Riverscape

LS 3: *The Council shall prepare a Landscape Character Assessment for the Plan area, in consultation with the Department of the Environment, Heritage and Local Government and the Heritage Council.*

LS 2: *It is the policy of the Council to preserve views and prospects as illustrated on the accompanying map as part of Appendix 1. Any development which may impact on same shall be accompanied by an appropriate visual impact assessment.*

Strategic Environmental Assessment

On foot of this submission, a specific objective ensuring full compliance with the requirements of the SEA Directive and associated Planning and Development (Strategic Environmental Assessment) Regulations, 2004, was added to the Plan which reads as follows;

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

b. Recommendations for Environmental Report

The EPA suggested that the full range of environmental effects as defined by the SEA Directive and Legislation, are included within the Matrix. In accordance with the SEA Directive an assessment of

the effects of implementing the plan was provided. To this end the assessment contained in Chapter 7 has been amended to include the terms above where necessary. This is attached. Furthermore it is recommended that the following is added to Chapter 2, Section headed 'Environmental assessment of the Draft County Development Plan' (Page 7):

A discussion is provided on grouped objectives and policies with further expansion on the significance (profound, moderate, imperceptible) of the identified impact; the duration (short, medium, long term, permanent or temporary) of the identified impact; the type (cumulative, irreversible, synergistic) of the identified impact, in accordance with EPA guidelines.

Furthermore, the EPA advise on the inclusion of a number of objectives. It propose to add the following Environmental Objectives to Chapter 5 of the Environmental Report:

- *To provide for the conservation of natural resources, including soils within the Town. (Soils and Geology)*
- *To protect and conserve agricultural land within the Town (Soils and Geology)*
- *To promote development which addresses and combats the factors which affect climate change (Climate Change)*

Finally the EPA required a statement on the extent of consultation with the adjoining Local Authorities and require further information on the zone of influence of the Plan outside the Plan area.

Consultation

A Scoping report was prepared and circulated to the statutory consultees for review and comment. They included the Environmental Protection Agency, the Department of the Environment, Heritage and Local Government and the Department of Communications, energy and Natural Resources. It is acknowledge that neighbouring local authorities were not consulted directly, however the publication of the draft Plan and Environmental Report were sufficiently well advertised to allow for neighbouring local authorities to comment should they wish to do so.

Zone of Influence

Longford Town is centrally located within the country and therefore environmental impacts arising from development within the county can impact on sensitive receptors outside the development Plan boundary. Trans boundary issues primarily relate to the emission of pollutants either through air dispersion or in aquatic environments. Also visual impacts particularly on the periphery of the town can have a trans boundary impact. The Development Plan recognizes these issues and will take all appropriate measures to ensure that the impact of the Plan's implementation will not adversely impact on environmental receptors within the town boundary in the first instance thereby ensuring that adverse impacts will not result outside the area also.

2) Development Applications Unit, Department of Environment, Heritage and Local Government

The DAU suggested that there was an opportunity to give a greater degree of protection to the historic environment of the town and as a result of the submission the following amendments were made to the Draft Plan.

HS 12: *Any application for planning permission relating to a residential development under this Strategy 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 the DoEHLG, shall be referred to the Heritage and Planning Division of the DoEHLG for observations/comment prior to a grant of permission/approval being obtained.*

ARCH 6: *To ensure that a qualified conservation architect or other specialist in this regard is involved in proposals relating to protected structures.*

3) Longford Heritage Office

The Longford Heritage Office submitted a detailed document relating to various issues relating to the natural and built environment. The Longford Heritage Office proposed a number of policy amendments and as a result the following significant changes were incorporated into the Plan.

Housing

HOU DES 8(f): *All boundary walls shall be capped and plastered, except in the case of fencing or stone walling. Some layouts may be required to omit front boundaries in order to preserve the character of the area. Generally the following standards apply:*

Front Walls: 0.5-1.2m high;

Side/Rear Walls: 1.8-2m high;

Estate Boundary/Dividing Walls between houses: 2m;

Alternatives including fencing with backplanting of shrubs and/or trees may be considered where privacy and/or security is preserved or where the character of the development requires it.

Archaeological Heritage

ARC 6: *It is the policy of the Council to strictly control development proposals on lands which may be detrimental to any area, site, structure, monument or object of archaeological significance, or detract from, its interpretation and setting. Development will only be permitted where the Council, in consultation with the DoEHLG, considers it acceptable, in view of its objectives and policies, and where all necessary mitigation has been carried out. Archaeological monitoring and assessment of works shall be required on or within the Zone of Archaeological Potential of a National or Recorded Monument.*

Natural Heritage and Biodiversity

NHB 17: *The Council is committed to facilitating the updated National Biodiversity Plan during the lifetime of the Development Plan and implementing the policies contained within, where relevant and practicable.*

NHB 18: *The Council shall facilitate the control and eradication of invasive species in order to protect and enhance the biodiversity and infrastructure of the Town.*

NHB 19: *The Planning Authority requires that developments shall have regard to biodiversity within their landscaping and planting schemes, utilising site-appropriate native plants and, where feasible, facilitating wildlife corridors and access to the natural heritage of the Town.*

NHB 19: *The Council is committed to protecting and enhancing the biodiversity value of the public realm within its control, through the adoption of appropriate planting schemes and landscaping and trimming methods.*

Architectural Heritage

ARCH 1: *It is an objective of the Council to promote the maintenance, conservation and appropriate re-use of the existing building stock as a sustainable development issue and*

because of the contribution of older buildings, both individually and collectively, to the unique character, heritage and identity of the Town.

Quality and Character of Urban Areas

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.*

CHAR 2: *It is the policy of the Council that all new development in urban and rural situations must be guided by high standards of design. During the lifetime of the Plan, the Council will produce appropriate design guidance in this regard.*

CHAR 3: *It is the policy of the Council to encourage the re-use of the existing building stock in an appropriate manner in line with standard conservation principles and the Council's policy on sustainable development in order to integrate a proposed development into the existing streetscape and to reduce construction and demolition waste.*

Alternatives

Introduction

The issue of alternatives is necessary in assessing the overall philosophy of the Development Plan. In accordance with the guidelines the alternatives put forward in this section are realistic and capable of implementation. The following is taken directly from the Environmental Report, Chapter 6.

The issue of alternatives is necessary in assessing the overall philosophy of the Town Development Plan. In accordance with the guidelines the alternatives put forward in this section are realistic and capable of implementation.

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

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

At the outset of the Development Plan process, a number of development scenarios were highlighted based on the current and predicted future needs of the town. In broad terms the scenarios were grouped into three viable and differing approaches. Each scenario has a differing outcome and these are discussed further below. The alternatives considered are broadly defined as:

- Option 1 – Non Planned– Non-restrictive (Worst Case);
- Option 2 – Guidance Only – Open for consideration, Developer led; and
- Option 3 – Planned – Coordinated and managed - Sustainable.

The Options

The Local authority recognizes that the population of the town will increase by 26% over the plan period. This prediction is based on a population study prepared for the local authority and is in line with Regional population growth rates. Therefore the local authority has a duty to plan for this increase and to set out a vision for how it can be suitably accommodated within the plan area. Allied to this is the provision of essential services and appropriate infrastructure to facilitate both the existing and future population needs and to ensure employment opportunities exist through economic development or activity.

Option 1: Non Planned

The non-planned approach to the future development of Longford Town can be viewed as the 'worst-case' scenario. In order to develop under this scenario, the Planning Authority would allow for development to proceed in an ad hoc manner at any location within its functional area. Under this scenario potentially inappropriate lands would be zoned for development without truly assessing the overall need for, or scale of development or the resultant impacts on the environment, neighbouring lands uses, infrastructure etc. As a result development pressure both on the fringes of the town as well as in the open countryside would result. This policy would not require careful consideration of the environmental impacts of such development, either individually or cumulatively.

While this alternative would allow for development and would provide some short term economic benefits to the town and surrounding hinterland, it is not sustainable and therefore not a viable or acceptable alternative in practice. Such development is uncontrolled and essentially developer-led but without the key infrastructure in place. This option would result in the development of the town through market forces in an unsustainable manner. The physical and socio-economic characteristics would at best remain as they are, though deterioration is more likely. This scenario takes a short term view of developing the town with no consideration of the long term negative environmental consequences.

This weak planning approach would have the following results:

- A deterioration in the surrounding rural landscape and natural environment;
- Little or no adherence to the settlement strategy;
- Serious traffic congestion and disruption to existing residents throughout the town;
- Inadequate environmental measures, leading to a sub-standard environmental quality;
- Impact negatively on the visual amenity and potential of the town area; and
- Domination of market forces resulting in piecemeal development.

Option 2: Guidance Only

The 'Guidance Only' scenario sets forth the preferred development strategy for the town as envisaged by the local authority. However the implementation of the Plan is somewhat lackluster and would only be viewed as the preferred approach but not the enforceable approach. This scenario favours the developer. While development in broad terms will be directed to certain areas, a significant level of flexibility will be employed when considering development in other areas, particularly in sensitive parts of the town. In much the same way as the weak approach, the future development of the county would be haphazard and somewhat uncontrolled, allowing others to dictate the location and scale of development. The result would likely include:

- Reasonable quantity of development within the county, in line with predictions;
- Poor control on development;
- Lack of long term focus; and
- Poor environmental protection.

Option 3: Planned.

A planned approach to the approval of acceptable development within the town will enable development to be targeted to key areas in a sustainable and managed way. This approach ensures that the predicted growth is accommodated in a planned and orderly manner. Ultimately the core issue of sustainability is addressed and significantly a balance between development and environmental protection is enshrined in the plan. Thus, this approach is a long term vision for the town.

Severely restrictive policies towards development in highly defined sensitive areas in terms of flood plain protection, ground water vulnerability or visually sensitive will apply. Under this scenario the following results are envisaged:

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

Matrix – Assessment of the Options

Environmental Assessment of the Alternatives



Option 1 – Non planned	✗	✗	✗	✗	✗	✗	✗	✗	✗
Option 2 – Guidance Only	✗	?	✗	✗	✗	✗	✗	✗	✗
Option 3 – Planned	✓	✓	✓	✓	✓	✓	✓	✓	✓

Conclusion

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

Similarly Option 2, the ‘Guidance Only’ approach, is not a desirable option. While the Local Authority may set forth its preferred strategy for the future development of the town, it is for guidance purposes only. This option would not realise the long term vision for the town and may instead result in poor environmental protection and ad hoc, unsustainable development.

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

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

Monitoring

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

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

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

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

Conclusion

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

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