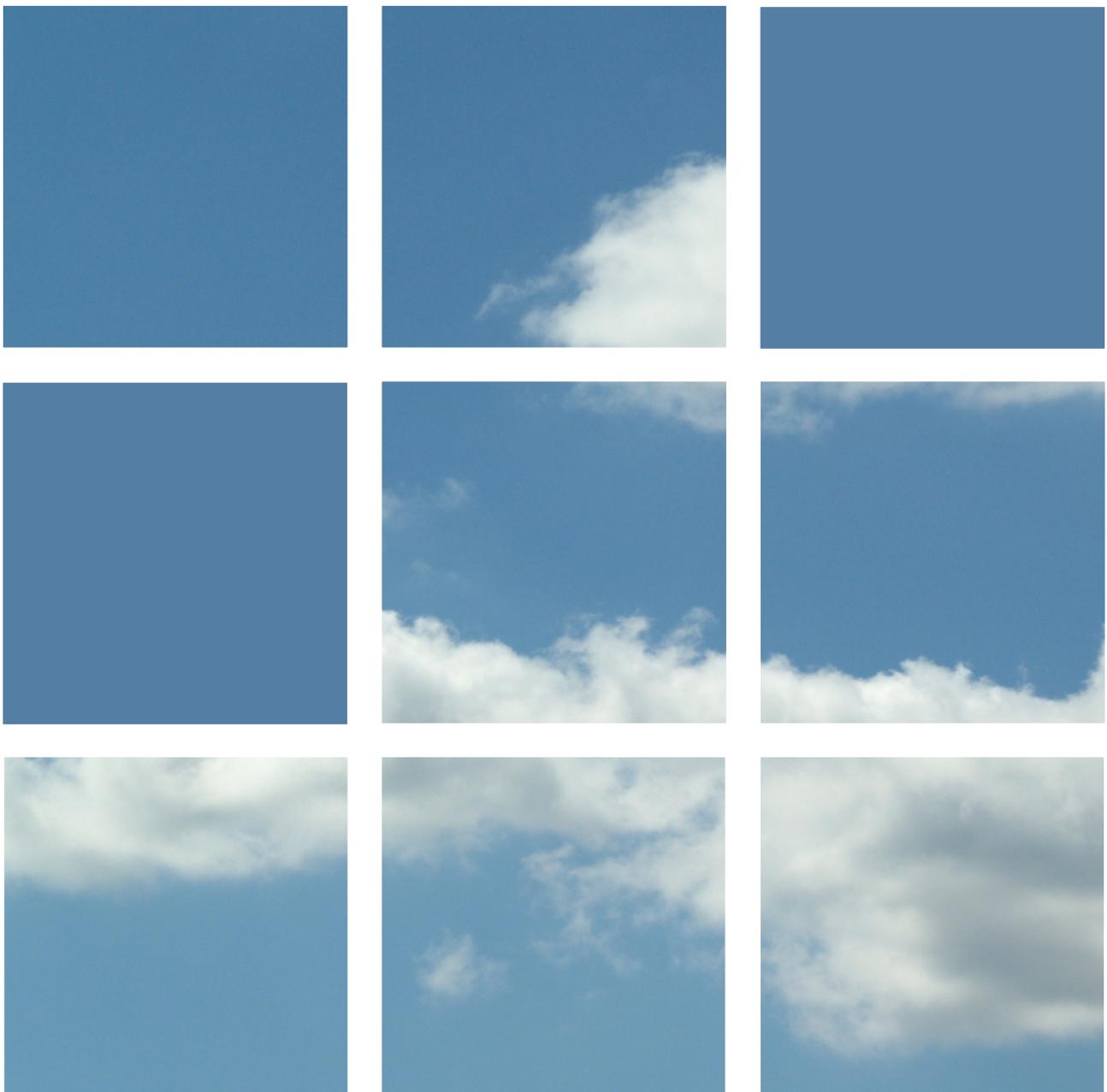


Kiltiernan/ Glenamuck Local Area Plan (2013-2019)

Strategic Environmental Assessment Statement



Kiltiernan/ Glenamuck Local Area Plan (2013-2019) SEA Statement

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APPENDICES

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ABBREVIATIONS

AA	Appropriate Assessment
CDP	County Development Plan
DAFM	Department of Agriculture, Food and the Marine
DAHG	Department of Arts, Heritage and the Gealtacht
DCENR	Department of Communication, Energy and Natural Resources
DECLG	Department of Environment, Community and Local Government
EC	European Community
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
EU	European Union
GIS	Geographic Information System
LAP	Local Area Plan
NHA, pNHA	Natural Heritage Area, proposed Natural Heritage Area
NPWS	National Parks and Wildlife Service
NSS	National Spatial Strategy
OTI	Objectives, Targets and Indicators
RMP	Recorded Monuments and Places
RPG	Regional Planning Guidelines
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area

This SEA Statement was prepared by RPS on behalf of Dún Laoghaire-Rathdown County Council.

1 INTRODUCTION

Strategic Environmental Assessment (SEA) is a process for evaluating, at the earliest possible stage, the likely environmental effects of implementing a Plan or other strategic action in order to ensure environmental considerations are appropriately addressed in the decision-making process, both during their preparation and prior to adoption of a Plan.

The European Directive (2001/42/EC) on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the SEA Directive) was transposed into national legislation by the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435/2004), as amended by S.I. 200 of 2011 and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436/2004), as amended by S.I. 201 of 2011. The Kiltiernan/ Glenamuck Local Area Plan (2013-2019), hereafter referred to as 'the LAP', falls under the remit of S.I. 436/2004 and S.I. 201/2011.

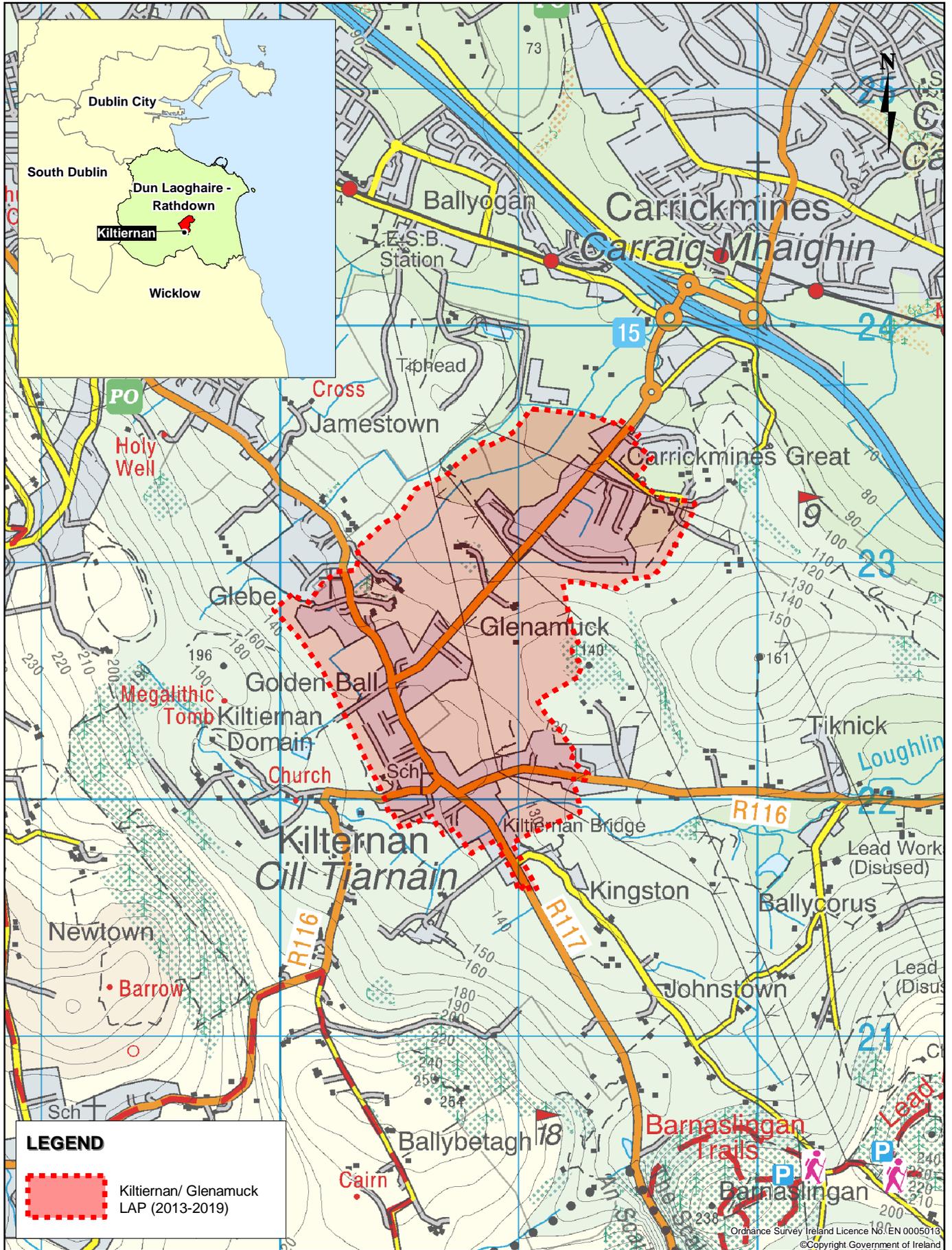
SEA legislation requires that the Plan-making authority make available a statement summarising how the SEA and consultations have been taken into account in the Plan (Section 14I of S.I. 436/2004). This statement is referred to as the SEA Statement.

This is the SEA Statement of the Kiltiernan/ Glenamuck Local Area Plan (2013-2019) Strategic Environmental Assessment. **Figure 1.1** shows Kiltiernan/ Glenamuck's location within the wider area and its current administrative boundary.

The SEA process is comprised of four main steps and these have been followed for the SEA of Kiltiernan/Glenamuck Local Area Plan (2013-2019) as outlined in **Table 1.1**. An illustration of the key steps in the SEA process is also shown in **Figure 1.2**.

Table 1.1: Steps Followed in the SEA Process for Kiltiernan/ Glenamuck LAP (2013-2019)

Step	Requirement in relation to Kiltiernan/ Glenamuck Local Area Plan
1 – Screening	In accordance with the SEA Directive 2001/42/EC and the Planning and Development Act 2000 (as amended) there is a mandatory requirement for the Kiltiernan/ Glenamuck Local Area Plan to undertake SEA as the LAP falls within the following thresholds: <ul style="list-style-type: none"> a. subject to preparation and adoption by a local authority; b. prepared for land use which will set the framework for future development consent of projects listed in the EIA Directive; and c. has a population in the area over 5,000 persons .
2 – Scoping	An SEA Scoping Report and letter for this LAP was issued to the relevant Environmental Authorities and adjoining Local Authorities in December 2012. Those consulted included: the Environmental Protection Agency, the Department of Environment, Community and Local Government, the Department of Agriculture, Food and the Marine, the Department of Communications, Energy and Natural Resources and the Department of Arts, Heritage and Gaeltacht.
3 – Environmental Assessment and Environmental Report	The Draft Kiltiernan/ Glenamuck Local Area Plan, together with the SEA Environmental Report went on public display from the 17 th May 2013 to the 28 th June 2013. Submissions received were reviewed and proposed amendments were made as a result, which were documented in the Manager's Report. The Kiltiernan/ Glenamuck LAP was adopted at a Council Meeting on the 9 th September 2013.
4 – SEA Statement	This SEA Statement reports on how environmental considerations and the consultations for this LAP have been integrated into the adopted Plan.



**FIGURE 1.1 - KILTIERNAN/ GLENAMUCK LAP (2013-2019)
ADMINISTRATIVE BOUNDARY**

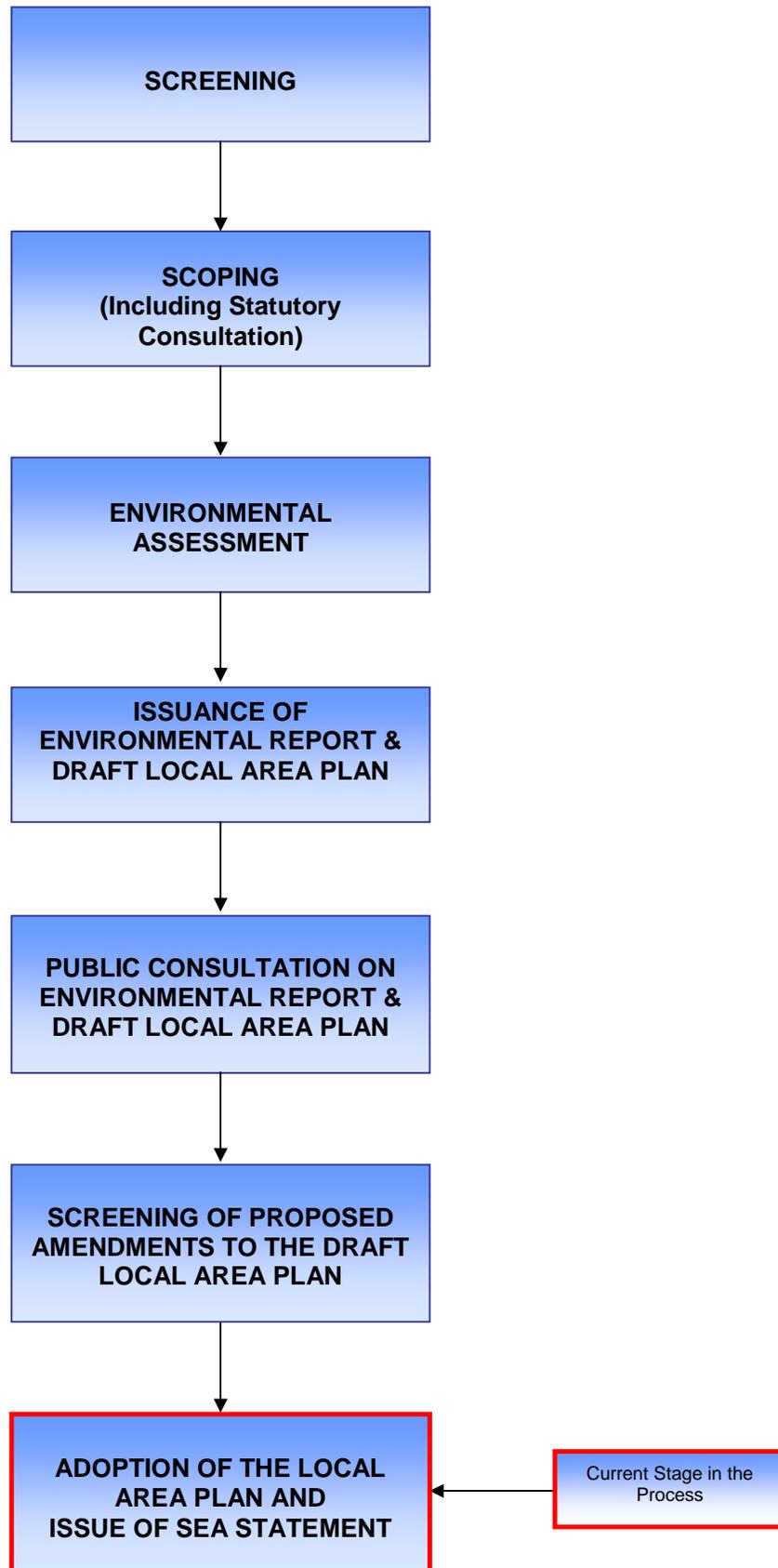


Figure 1.2: Overview of the SEA Process

1.1 CONTEXT OF THE 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 consultees and the recommendations of the Environmental Report have been taken into account in the adopted Local Area Plan. It illustrates how decisions were taken, making the process more transparent. This statement will be made available to the public to accompany the adopted Local Area Plan.

In accordance with section 14I of the Planning and Development (Strategic Environmental Assessment) Regulations, 2004 (as amended), the Planning Authority is required to prepare a statement summarising the following: -

- a) *“how environmental considerations have been integrated into the Plan;*
- b) *how*
 - 1) *the environmental report pursuant to article 14B,*
 - 2) *submissions and observations made to the planning authority in response to a notice under section 20(3) of the Act, and*
 - 3) *any consultations under article 14F,*
- c) *the reasons for choosing the plan or amendment, as adopted, in light of the other reasonable alternatives dealt with, and*
- d) *the measures decided upon to monitor, in accordance with article 14J, the significant environmental effects of implementation of the plan or amended plan”.*

This SEA Statement summarises the above mentioned considerations and follows a similar format to that outlined above.

1.2 ENVIRONMENTAL ASSESSMENT OF THE PLAN

Dún Laoghaire-Rathdown County Council (DLRCC) prepared the Kiltiernan/ Glenamuck Draft LAP (2013 - 2019), hereafter referred to as the Draft LAP or LAP, to replace the existing Kiltiernan/ Glenamuck LAP (2007). The Draft LAP was prepared under the provisions of the Planning and Development Act 2000 (as amended) to develop and improve in a sustainable manner the environmental, social, economic and cultural assets of Kiltiernan/ Glenamuck. The boundaries of the administrative area of Kiltiernan/ Glenamuck are shown in **Figure 1.1**.

The Draft LAP will provide the means by which the specific objectives and activities of the private and public sector will be coordinated, to ensure that they are implemented in a mutually integrated, consistent, sustainable and supportive manner. It will promote and encourage development, conserve and protect the environment and make the best possible use of resources.

The Environmental Assessment involved assessing the potential impacts of elements proposed in the Draft LAP. This was done by first gathering and assessing all available baseline information on indicators described in the SEA Directive i.e. biodiversity, flora and fauna, population, water, soil, climate change, material assets, cultural heritage and landscape. It was considered necessary to combine some indicators in order to avoid unnecessary duplication.

The assessment process involved a series of telephone discussions and meetings attended by members of the RPS SEA/ AA team and the Dún Laoghaire-Rathdown County Council planning officers preparing the Draft LAP. There was continued discussion and liaison between the project teams to check on and improve the updates to the Draft LAP and also with regard to changing elements as the LAP evolved, any new impacts were identified and evaluated.

2 HOW ENVIRONMENTAL CONSIDERATIONS HAVE BEEN INTEGRATED INTO THE LAP

2.1 INTRODUCTION

The main aim of SEA is to improve Kiltiernan/ Glenamuck Local Area Plan in terms of sustainability and its impact on the environment. This section outlines how the LAP evolved and at what stages the SEA influenced the LAP.

2.2 BASELINE DATA COLLECTION

From the outset, a key aspect of the SEA and AA has been the collection of relevant environmental baseline data for the administrative area covered by the Kiltiernan/ Glenamuck LAP. This was achieved through consultation with and review of various existing databases and data sets available through Dún Laoghaire-Rathdown County Council and organisations such as the EPA, National Parks and Wildlife Service and the Geological Survey Ireland.

Collection of this information has allowed the identification of key environmental sensitivities, sensitive areas and pressure points within and surrounding the Kiltiernan/ Glenamuck administrative area. GIS mapping has been used in the Environmental Report to illustrate the data, where possible, in order to allow easy visual recognition of pressures and sensitivities in and around Kiltiernan/ Glenamuck. Detailed consultation took place during the preparation and gathering of baseline data and GIS mapping preparation to inform the SEA and AA.

The key environmental issues identified as a result of review of the baseline environment are set out in **Table 2.1**. These environmental pressures have been used to inform the Strategic Environmental Objectives (SEOs) used to assess the alternative scenarios for the development of the area and the Draft LAP policies and objectives.

Table 2.1: Existing Environmental Pressures in Kiltiernan/Glenamuck

Topic	Existing Pressures
Traffic	In recent years population growth and increasing residential development has placed additional pressure on the existing road network. Improvements in transport infrastructure are required and an EIS has already been produced on the Glenamuck District Distributor Road Scheme.
Water Quality	The Local Area Plan is located in the Eastern River Basin District (ERBD). A range of activities occurring in the ERBD have been identified which are putting pressure on water quality. The main pressures are from agricultural runoff, wastewater and industrial discharges, urban stormwater overflows and misconnections to the surface water system.
Wastewater	The upgrade of the Shanganagh Waste Water Treatment Plant has alleviated wastewater issues however unsewered properties put significant pressure on rivers.
Biodiversity	Agricultural practices put increasing pressure on biodiversity in particular the loss of existing hedgerows.
Water Supply	Water supply demands in the Greater Dublin Area have increased putting increasing pressure on existing supplies. DLRCC is part of the Greater Dublin Water Supply Area which has identified a need for a new water source due to increased pressure on existing sources. The SEA Statement for the Water Supply Project Dublin Region has been published along with the Final Plan which identifies the preferred new source option.
Pollution	Potential pollution sources were identified in the CDP SEA 2010-2016, including domestic effluent from poorly maintained septic tanks along with low intensity agriculture and run-off from road surfaces.
Landfill	The Ballyogan landfill abuts the boundary of the Plan. The landfill is no longer in operation and

Topic	Existing Pressures
	remediation measures have been undertaken, along with monitoring of groundwater. Existing pressure exists on the environment in relation to landfill leachate. Illegal dumping within the Local Area Plan would incur pressures on the environment.
Flood Prevention	The Office of Public Works has identified areas subject to flooding adjacent to the LAP boundary. The Shanganagh system has incurred a number of flood events.

2.3 ENVIRONMENTAL ASSESSMENT OF THE PLAN

The SEA process involved consultation and meetings with members of the SEA team and a number of specialists and Dún Laoghaire-Rathdown County Council who focussed on the significant environmental issues identified during the scoping and assessment of baseline information for the area.

A system of Strategic Environmental Objectives was employed in the assessment of the Draft LAP policies and objectives. Development of these has been the result of comments made at the scoping stage, discussions with the Plan team and with reference to the mapping produced for the baseline in the SEA.

The SEA reviewed each individual policy and objective contained in the Draft Kiltiernan/ Glenamuck Local Area Plan against the objectives and associated assessment criteria developed for the SEA (see **Table 2.2**).

Where a negative assessment was recorded, the SEA provided suggested amendments in the form of changes, additions or deletions to text as a result of the assessments.

Table 2.2: SEA Objectives and Detailed Assessment Criteria

Objective 1 Biodiversity Flora and Fauna (BFF)	Protect and where appropriate, enhance biodiversity, particularly protected areas and protected species.
Objective 2 Population (P)	Improve people's quality of life based on high-quality residential, working and recreational environments and on sustainable transport.
Objective 3 Water (W)	Improve water quality and the management of watercourses to comply with the standards of the Water Framework Directive and incorporate the objectives of the Floods Directive into sustainable planning and development.
Objective 4 Soil (S)	Protect and, where appropriate, enhance the function and quality of the soil resource in the lands within Kiltiernan/ Glenamuck LAP.
Objective 5 Climate (C)	Contribute to mitigation of, and adaptation to, climate change.
Objective 6 Cultural Heritage (CH)	Protect and, where appropriate, enhance the character, diversity and special qualities of cultural, architectural and archaeological, heritage in Kiltiernan/ Glenamuck LAP.
Objective 7 Landscape (L)	Protect and, where appropriate, enhance the character, diversity and special qualities of landscapes in Kiltiernan/ Glenamuck LAP.
Objective 8 Material Assets (MA)	Make best use of existing infrastructure and promote the sustainable development of new infrastructure.

2.4 INFLUENCE OF SEA DURING PREPARATION OF THE LAP

An initial assessment of policies, objectives and general text of the Draft LAP was undertaken to inform the development of the LAP. The initial assessment resulted in a number of policies and objectives being amended to reflect initial concerns raised by the SEA and AA Team as a result of issues identified through review of the baseline environment (as per **Table 2.2**), review of hierarchy of plans and programmes and review of environmental and planning legislation and guidance documentation. These initial mitigation measures put forward by the SEA and AA Teams for inclusion within the Draft LAP at the outset are outlined in **Table 2.3** and mainly relate to specific and general environmental concerns.

The first column of **Table 2.3** provides the recommendations from the SEA and AA team and the second column outlines if these policies/ objectives are included in the Draft LAP.

Table 2.3: Initial High Level SEA/AA Changes to Kiltiernan/ Glenamuck LAP Policies

Overarching Policies and Objectives	Address of Changes to Draft LAP
The overarching policies and objectives of the Dún Laoghaire-Rathdown County Development Plan will equally apply to any development and any associated works, individually or in combination with other plans or projects within the Local Area Plan (LAP) boundaries.	Policy included in the Draft LAP
The EU Directives for Environmental Impact Assessment (EIA) and Strategic Environmental Assessment (SEA) are the fundamental policy framework of environmental protection measures and legislation for the delivery of the policies within this document and full compliance with the EIA and SEA Directives shall be provided.	Policy included in the Draft LAP
Ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) will be subject to Appropriate Assessment Screening.	Policy included in the Draft LAP
Biodiversity and Natural Heritage	
Conserve, enhance and manage the County's natural heritage including its biodiversity, landscapes and geological heritage and promote understanding of and sustainable access to it.	Policy included in the Draft LAP
Ensure that all plans and projects in the County which could, either individually or in combination with other plans and projects, have a significant effect on a Natura 2000 site (or sites) will be subject to Appropriate Assessment Screening.	Policy included in the Draft LAP
To ensure that a Natura Impact Statement (NIS) is produced once Appropriate Assessment (AA) screening has indicated likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites.	Policy included in the Draft LAP
To promote the protection of habitats which, by virtue of their linear and continuous structure (e.g. rivers and their banks) or their contribution as stepping stones (e.g. ponds or small woods), are essential for the migration, dispersal and genetic exchange of wild species.	Policy included in the Draft LAP
To support the National Parks and Wildlife Service (NPWS) and Department of Environment, Community and Local Government (DECLG), in the maintenance and, as appropriate, the achievement of favourable conservation status for the habitats and species to which the EU Habitats Directive applies.	Policy included in the Draft LAP
To consult with the National Parks and Wildlife Service (NPWS) when undertaking, approving and authorising development which is likely to affect plant, animal or bird species protected by law. In the event of a proposed development impacting on a site known or likely to be a breeding or resting site of species listed in Habitats Regulations a derogation licence, issued by the Department of Environment, Community and Local Government (DECLG) will be required in advance of a permission.	Policy included in the Draft LAP
To ensure the implementation of the EU Freshwater Fish Directive and its transposition into Irish legislation in order to protect any fish and shellfish habitat in the LAP area.	Policy included in the Draft LAP

Overarching Policies and Objectives	Address of Changes to Draft LAP
To recognise and contribute towards protection of habitats from alien / invasive species (e.g. Japanese knotweed, giant hogweed, Himalayan balsam, etc.) in accordance with Action Number 4.7 of the Dún Laoghaire-Rathdown Biodiversity Plan 2009-2013.	Policy included in the Draft LAP
Ensure that no development, including clearance and storage of materials, takes place within a minimum distance of 15m measured from each bank of any river, stream or watercourse in the LAP area.	Policy included in the Draft LAP
In the event of lighting being proposed along river or canal corridors an Ecological Impact Assessment (and where necessary an Appropriate Assessment) including bat and otter surveys shall be conducted by specialists. The recommendations of the specialist studies shall be implemented. No lighting will be installed without prior consultation with the National Parks and Wildlife Service (NPWS) and shall be in line with advances in knowledge into the impact of lighting on bats and other species and also to reflect advances in technology in the lighting industry.	Policy included in the Draft LAP
To ensure the monitoring and control of EIA sub-threshold development within the LAP through the document <i>Environmental Impact Assessment (EIA) Guidance for Consent Authorities regarding sub-threshold development (DEHLG, 2003)</i> with specific reference to the requirement of Appropriate Assessment (AA) screening.	Policy included in the Draft LAP
Water Supply and Management	
To ensure the implementation of the EU Drinking Water Directive in order to achieve and improve appropriate water quality standards for the LAP for human consumption while conditioning development dependent on sufficient water supply.	Policy included in the Draft LAP
To ensure the implementation of the European Communities Drinking Water (No.2) Regulations 2007, S.I. No. 278 of 2007 and the EPA 2010 guidance on the <i>Implementation of the Regulations for Water Services Authorities for Public Water Supplies</i> . These regulations shall be applied for increased penalties in case of non-compliance and programmes to minimise water supply leakage shall be developed.	Policy included in the Draft LAP
To ensure the implementation of the EU Groundwater Directive.	Policy included in the Draft LAP
To require that all development relating to water supply and waste water treatment are subject to Appropriate Assessment to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	Policy included in the Draft LAP
Wastewater	
To ensure the implementation of the EU Urban Waste Water Directive and its transposition into Irish legislation, namely the Urban Waste Water Treatment Regulations 2001 and 2004.	Policy included in the Draft LAP
To ensure the changeover from septic tanks to mains connections in all cases where this is feasible and that all new developments utilise and connect to the existing wastewater infrastructure. The provision of individual septic tanks and treatment plants in the LAP will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards will be required, including the EPA 2009 <i>Code of Practice: Wastewater Treatment and Disposal Systems Serving Single Houses (PE ≤ 10)</i> .	Policy included in the Draft LAP
To promote assessment of the adequacy of the existing wastewater treatment facilities in terms of both capacity and performance as well as potential risk to human health and water quality.	Policy included in the Draft LAP
Surface Water Drainage	
To ensure the implementation of the EU Water Framework Directive and its transpositions into Irish legislation.	Policy included in the Draft LAP
To implement the specific relevant objectives and measures for individual water bodies set out in the Eastern River Basin Management Plan and associated Programme of Measures, where relevant.	Policy included in the Draft LAP

Overarching Policies and Objectives	Address of Changes to Draft LAP
To ensure the implementation of the surface water legislation <i>Environmental Objectives (Surface Waters) Regulations 2009</i> S.I. No 272 of 2009 and the EPA report <i>Water Quality in Ireland 2007-2009</i> in order to achieve general improvements of any water supplies in the LAP.	Policy included in the Draft LAP
To require that a Sustainable Drainage System (SuDS) is applied to any development and that site specific solutions to surface water drainage systems are developed, which meet the requirements of the Water Framework Directive and associated River Basin Management Plans.	Policy included in the Draft LAP
Groundwater Protection	
To ensure that planning applications have regard to any existing groundwater protection schemes and groundwater source protection zones and/or the likely impacts that the development may have on groundwater.	Policy included in the Draft LAP
To ensure the protection of the groundwater resources in and around the LAP and associated habitats and species.	Policy included in the Draft LAP
Flood Risk Management	
To ensure the implementation of the EU Floods Directive and its transposition into Irish legislation in order to prevent, reduce and control flood risk in river basin and coastal areas due to increased domestic and economic development in flood risk zones and climate change effects.	Policy included in the Draft LAP
To implement the recommendations of the relevant Catchment Flood Risk Assessment and Management (CFRAM) study and the mitigation measures and recommendations arising from the associated SEA and AA shall also be addressed and implemented.	Policy included in the Draft LAP
To implement the <i>Planning System and Flood Risk Management for Planning Authorities</i> (DoEHLG/OPW 2009) and the National Flood Hazard Mapping (OPW 2012) while referring to the relevant Flood Risk Management Plan (FRMP) for the LAP.	Policy included in the Draft LAP
To require that all proposed flood protection or alleviation works will be subject to Appropriate Assessment (AA) to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	Policy included in the Draft LAP
To ensure riparian buffer zones are created between all watercourses and any development, a minimum of 15m to mitigate against flood risk. The extent of these buffer zones shall be determined in consultation with a qualified ecologist and following a Flood Risk Assessment. Any hard landscaping proposals shall be located outside of these buffer zones.	Policy included in the Draft LAP
Waste Management	
To ensure the implementation of the EU Waste Framework Directive and its affiliated directives, namely the EU IPPC Directive, the Landfill Directive and the WEEE Directive.	Policy included in the Draft LAP
Prevent and minimise the generation of waste in accordance with the Waste Management Plan for the Dublin Region while minimising waste to landfill and considering suitable alternatives.	Policy included in the Draft LAP
Transport	
To have regard to the EU Ambient Air Quality Directive, the EU Ozone Directive, the EU guidance documents <i>Greening Transport</i> (EU 2008) and <i>A Sustainable Future for Transport</i> (EU 2009) and the National Transport Strategy <i>Smarter Travel: A Sustainable Transport Future</i> (DTTS 2009) to develop strategies which better reflect the real costs that transport volumes and emissions impose onto society, environment and economic efficiency.	Policy included in the Draft LAP
To promote maximum accessibility through routes of optimised connectivity and permeability for walking, cycling and public transport while establishing safe infrastructure for all vulnerable road users.	Policy included in the Draft LAP
Economic Development	

Overarching Policies and Objectives	Address of Changes to Draft LAP
To ensure that any industry development will be subject to Appropriate Assessment (AA) Screening to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	Policy included in the Draft LAP
To require that all development proposals are subject to AA screening to ensure there are no likely significant effects on the integrity, defined by the structure and function, of any Natura 2000 sites and that the requirements of Article 6 of the EU Habitats Directive are met.	Policy included in the Draft LAP

Mitigation measures proposed as a result of the detailed assessment of policies and objectives of the LAP are set out in **Table 2.4**. Mitigation measures are proposed in the form of new policies / objectives and / or amendments to the text of policies / objectives. The mitigation included in the assessment of policies and objectives does not refer to the general requirement for assessment of impacts on the environment but instead assumes requirements for environmental assessment in accordance with the normal development management process and EIA Directive as a given.

Column one of **Table 2.4** provides information on the policy or objective which is to be mitigated and the measures to be applied. Column two sets out whether they were included in the Draft LAP. All proposed insertions and proposed amendments are highlighted in red bold for ease of reference.

Table 2.4: Mitigation Measures Proposed as a Result of Assessment of Policies/ Objectives

Policies/ Objectives (Recommended changes in RED)	Address of Changes to Policies/ Objectives of Draft LAP and/ or Further Considerations
Phasing of dwelling units will be outlined on a map that will be included in the Draft LAP before it is adopted. This phasing will visually explain the approach that is outlined in Section 10 of the Draft LAP.	Chapter 10 of the Draft LAP includes: It is an objective of the Draft LAP to prepare a phasing map prior to the adoption of the LAP, to illustrate the phasing proposals described in this Section.
V04 To guide sustainable development in order to establish the character of the two component areas that comprise the Draft LAP namely, Glenamuck and Kiltiernan.	Added to Draft LAP
LHC19. To carry out a detailed ranking survey of the hedgerows be undertaken as part of any future development proposals, and where possible to incorporate these hedgerows within the development , although it is acknowledging that it will not be possible to retain all of the current hedgerows.	Added to Draft LAP
BF06: To encourage usage of local place names wherever possible in new developments.	Added to Draft LAP
MT10: New developments shall provide noise mitigation measures (e.g. boundary walls and/or double/triple glazing) to reduce noise within developments caused by new roads to be within acceptable levels.	Added to Draft LAP
EI13. It is a policy of the Council to facilitate the provision, upgrading and maintenance of adequate and appropriate waste water services and water supply to service new developments and in assessing applications will require that development proposed will only take place where appropriate sustainable waste water infrastructure is in place.	Added to Draft LAP
OS07. To provide for the appropriate types of active/passive	Added to Draft LAP

Policies/ Objectives (Recommended changes in RED)	Address of Changes to Policies/ Objectives of Draft LAP and/ or Further Considerations
recreational facilities both indoor and outdoor in the Draft LAP for all age groups. Facilities to be provided should be appropriate to the scale and needs of the development area whilst having regard to established or planned amenities in the wider environs. Adequate transport access to these recreational facilities via safe public transport and pedestrian/ cycleway network is paramount.	
SC04. Appropriate provision of educational and childcare facilities will be required to be put in place in advance of residential developments being granted planning permission.	Not added to Draft LAP: This policy more accurately reflects how the provision of schools is delivered in the Irish planning system. The following policy has been included. <i>SCD04: It is the policy of the council to ensure the reservation of primary and post-primary school sites in accordance with the requirements of the relevant education authorities. Schools will be delivered in the Draft LAP area in accordance with the "Code of Practice on the Provision of Schools and the Planning System".</i>
LHC8. Ensure that no development, including clearance and storage of materials, takes place within a minimum distance of 15m measured from each bank of any river, stream or watercourse in the Draft LAP area and be compliant with the 'Requirements for Protection of Fisheries Habitat during Construction and Development Works at River Sites' .	Added to Draft LAP
Ensure implementation of the Dublin Agglomeration Noise Action Plan in carrying out assessment and management of environmental noise.	Added Policy MT11: To ensure implementation of the Dublin Agglomeration Environmental Noise Action Plan
Ensure telecommunications within the Draft LAP area is expanded for in line with planned development of the area.	Section 6.7 added to Draft LAP: There are a number of current telecommunications providers within the Plan Area. It is anticipated that the fibre network can be extended with the development of the road network. This should be considered at the detail design stage of the roads.
Ensure sites of archaeological potential are protected and investigated in accordance with relevant licensing requirements before development takes place. Also include map of areas of archaeological potential as illustrated in Figure 5.8 of ER.	A Map will be included in the Draft LAP Section 3.3.1 of the LAP already includes the following text: <i>"It is Council policy to presume in favour of the preservation in situ of archaeological remains of importance and their settings. The Council will strictly control development proposals that may negatively impact on the significance of archaeological sites and monuments, and their setting and interpretation.</i> <i>Any proposed development in the environs of these archaeological sites will need to have due regard for the requirements pertaining to their protection. Development proposals within zones of archaeological potential and in or near recorded monuments will be considered when accompanied by an archaeological assessment."</i> <i>No further text/ objectives will be incorporated within the Draft LAP.</i>
Any proposed development within the Draft LAP should ensure that landscape designations are afforded protection.	Section 3.2.5 of the Draft LAP reads: <i>"It is Council policy (Policy LHB1 'Preservation of Landscape Character Areas' of the CDP 2010-</i>

Policies/ Objectives (Recommended changes in RED)	Address of Changes to Policies/ Objectives of Draft LAP and/ or Further Considerations
	<p>2016) to preserve and enhance the character of the landscape in accordance with the recommended strategies outlined in the Landscape Character Assessment (May 2002) and in accordance with the Guidelines for Landscape and Landscape Assessment (DOELG). Landscape character areas along with an identified strategy are outlined in the appendices of the CDP 2010-2016. Within the LAP area boundary, three Landscape Character Areas have been identified, namely the Kiltiernan Plain (No. 5), Ballycorus (No. 6) and Carrickmines (No. 13). Associated sensitivities/strategies for each respective area are described in the CDP."</p>
<p>Recommend inclusion of the HLCA recommendation on page 32 & 33 of Draft LAP as objectives of the Draft LAP.</p>	<p>All of the Recommendations are included already as part of policy/objectives. The recommendations are largely aspirational and the Council can't commit to them as objectives.</p>
<p>Recommend inclusion of specific policies for protection of high amenity zones as well as protected views and prospects.</p>	<p>High amenity zones are offered the highest level of protection of all zones, by virtue of the extremely restrictive land use zoning provisions. It is not necessary at all to restate this – it is written into the CDP</p> <p>Amend LHC21 to read:</p> <p>To ensure the preservation of the prospect of Three Rock, Two Rock Mountain and Carrickgollogan from Enniskerry Road and the designated protected views southwards from Ballycorus Road.</p>
<p>To protect built heritage features including protected structures, Architectural Heritage Area (ACA), and Recorded Monuments and Places as per detailed policies set out in the Dún Laoghaire-Rathdown County Development Plan 2010 – 2016.</p>	<p>Insert new objective (old LHC22 is renumbered LHC23)</p> <p><i>LHC22 To comply with all of the policies for the protection of the Architectural Heritage in the current Dún Laoghaire-Rathdown County Development Plan, including those set out in the Development Management Section. In particular to provide appropriate protection for the protected structures and recorded monuments in the area.</i></p> <p>ACA objective is included as LHC23</p>

2.5 INFLUENCE OF AA ON THE LAP

The purpose of AA is to ensure that the Kiltiernan/ Glenamuck Local Area Plan does not contain any policies or objectives that could lead to negative impacts on the integrity of an EU designated site. The AA process was undertaken in parallel with the Plan making process and the SEA. The results of the AA Screening were published in consultation with the SEA Environmental Report and the Draft LAP.

An assessment of the Draft LAP was carried out in parallel with the SEA process. The AA process ensured that environmental considerations, specifically focused on Natura 2000 sites, were integrated into the LAP as it was developed. Under the EU Habitats Directive, any plan or project not directly connected with or necessary to the management of Natura 2000 sites, namely, Special Areas of Conservation (SAC) or Special Protection Areas (SPA), but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an AA of its implications for the site in view of the site's conservation objectives.

The administrative area of the Kiltiernan/Glenamuck LAP does not include any Natura 2000 sites, though there are three designated sites in the surrounding area. The Wicklow Mountains SPA (site code 004040) is the closest SPA and is approximately 8.5km from the LAP boundary. Knocksink Wood SAC (site code 000725) and Ballyman Glen SAC (site code 000713) are also located in the vicinity of the Draft LAP boundary.

Based on the screening for AA of Natura 2000 sites, it was concluded that the Draft LAP would not have a significant impact on the Natura 2000 network and a Stage 2 AA is therefore not required.

In addition, no mitigation measures were proposed in relation to the proposed amendments to the Draft LAP.

3 CONSULTATION PROCESS

3.1 SCOPING

Two stages of consultation have taken place with respect to the Strategic Environmental Assessment and Appropriate Assessment of the Kiltiernan/ Glenamuck Local Area Plan 2013-2019.

The first stage of consultation took place in January 2013 and related to the statutory SEA scoping stage of consultation. A Scoping Report was compiled in December 2012 outlining the scope and level of detail proposed for the SEA Environmental Report. This was issued to the five statutory environmental authorities as prescribed under the Planning and Development (SEA) Regulations 2004 (as amended) including:

- Environmental Protection Agency (EPA);
- Department of Environment, Community and Local Government (DECLG);
- Department of Agriculture, Food and the Marine (DAFM);
- Department of Communications, Energy and Natural Resources (DCENR); and
- Department of Arts, Heritage and the Gaeltacht (DAHG).

Three submissions were received at the Scoping stage of the consultation process. The Dublin District Unit of Inland Fisheries Ireland responded by letter dated 31st December 2012. Two EPA responses were received dated 16th January 2013 and 21st January 2013.

These submissions related to the following:

- EU directives, national/regional legislation, guidelines and policies.
- Drinking water supply and flooding.
- Residential zoning.
- Environmentally sustainable development consistent with CDP and RPGs.
- Sustainable development of the inland and marine fisheries resource.
- Water quality and ecological considerations.
- Wastewater treatment and urban wastewater discharge.
- Protection and maintenance of watercourses and riparian habitats.

These submissions informed the environmental issues which were included in the subsequent Environmental Report as well as the level of detail to which they were addressed. The Scoping Document is available for review on request from Dún Laoghaire-Rathdown County Council. Submissions received were attached to the Environmental Report as published in May 2013.

3.2 DRAFT LAP AND SEA ENVIRONMENTAL REPORT PUBLIC CONSULTATION PHASE

The second period of consultation took place between 17th May 2013 and 28th June 2013. At this stage, the Draft Kiltiernan/ Glenamuck Local Area Plan (2013-2019) was placed on public display along with the SEA Environmental Report and associated Appropriate Assessment Screening Report. A total of 60 no. submissions were received during this stage of the consultation process. Consultation responses included submissions from the environmental authorities as well as the public, other stakeholders and LAP statutory consultees.

Submissions and observations made in relation to the Draft LAP, SEA Environmental Report and AA Screening Statement included the following key topics:

- Various requests and concerns expressed regarding residential zoning and phased development;
- Traffic issues, including those concerned with the proposed Glenamuck road network and land parcel access;
- Sustainable and public transport, including cycleways and Luas, as well as the proposed 'bus-gate';
- Environmental considerations involving the inclusion of additional Programmes and Measures (CFRAMS), groundwater and ecological linkages; and
- Power infrastructure issues, such as the merits and feasibility of undergrounding overhead powerlines.

All relevant environmental submissions made to the Draft LAP were reviewed by the SEA/ AA Team. A Manager's Report on the submissions/observations received during the public display period was prepared setting out the proposed amendment to the Draft LAP. Each of the proposed amendments to the Draft LAP contained within the Managers Report was screened by the SEA/AA Team.

No significant impacts as a result of implementing the proposed amendments were identified as part of this SEA/AA Screening and therefore no mitigation measures were proposed on this basis.

Most of the submissions received related to specific aspects of the LAP itself but there were some that did relate to the SEA Process. The following amendments to the LAP are summarised in **Table 3.1**.

Table 3.1: Summary of Amendments

Issue Raised	Response
<p>Amendments by Motion</p> <p>1. The Minister of the Environment, Community and Local Government suggested the inclusion of a map of building heights after page 35 in the LAP illustrating the building height provisions for each land parcel.</p> <p>2. The EPA suggested consideration should be given in Primary Objective</p>	<p>Manager's Response: Amendment accepted.</p> <p>Manager's Response: Amendment accepted.</p>

Issue Raised	Response
VO7 to also include a reference the Water Framework Directive and Floods Directive.	
3. The EPA suggested consideration should be given to amend as follows Objective LHC1 to take into account existing groundwater protection schemes.	Manager's Response: Amendment accepted.
4. The EPA suggested Objective LHC2 should take into account the Water Framework Directive also in terms of protecting groundwater quality.	Manager's Response: Amendment accepted.
5. The EPA suggested Section 3.1.5, <i>Water Catchment Draining Areas and Surface Drainage</i> , be amended to include an Objective referencing the Eastern River Basin Management Plan and Programme of Measures.	Manager's Response: Amendment made to Section 3.1.5 to include reference to inclusion of the Eastern River Basin Management Plan and Programme of Measures.
6. The EPA noted merits in considering whether unfinished estates could be evaluated in terms of projected residential needs and zoning within the LAP.	Response: There are no existing unfinished estates within the LAP area; no changes to Draft LAP required.
7. The EPA notes that with regards to Objective OSO-3 that ecological linkages be afforded protection when providing for green space in the Plan area.	Manager's Response: Amendment accepted. Objective OSO-3 amended to include reference to the protection of ecological linkages.
8. The EPA suggested the inclusion of specific objectives with regards to establishing a Green Infrastructure Strategy for the Plan area.	Manager's Response: The Planning Department is in the early stages of formulating a Green Infrastructure Strategy for the county. It is intended to incorporate this in the next County Development Plan review. No changes made to Draft LAP at this time.
9. General comments from the Railway Procurement Agency on the objectives regarding sustainable and public transport options. Suggested a minor textual change to the remove the word 'proposed' when referring to the Ballyogan Wood Luas stop.	Manager's Response: Amendment accepted.
10. The Department of Communications, Energy and Natural Resources welcomed the provisions made for the	Manager's Response: Submission noted. No changes to the Draft LAP required.

Issue Raised	Response
protection of the aquatic environment in the Plan area.	
11. EirGrid submission related to the use and feasibility of undergrounding powerlines lines.	<p>Manager's Response: Submission noted. No changes to the Draft LAP required.</p>
12. The National Roads Authority highlighted the strategic importance of the M50 and M11 motorways and other comments related to road-carrying capacity and concerns about car-dependency.	<p>Manager's Response: Submission noted. No changes to the Draft LAP required.</p>
13. A number of submissions concerned the proposal for a 'bus-gate' which would be located at the junction of the Glenamuck Road with the proposed Glenamuck Link Distributer Road.	<p>Manager's Response: Draft LAP Section 5.3.1 amended to include text referring to the development of proposals for the implementation of a 'bus-gate' at the detailed design stage for the proposed distributor road and what restrictions if any would apply.</p>
14. Several submissions, including from the Department of Environment, Community and Local Government, in relation to the proposed phasing of development within the LAP area.	<p>Manager's Response: A number of amendments were made in relation to zoning, including reducing the numbers associated with the first three phases of residential development.</p>
15. Submission from the Landowners Consortium – Carrickmines Partnership. Main concerns involved infrastructure (bus-gate, proposed road network, undergrounding of powerlines), zoning and development (residential density and phasing of development), drainage (regarding attenuation ponds) and greenways.	<p>Manager's Response: The Draft LAP was amended to include a map illustrating the phasing proposals outlined in the LAP.</p>
16. Several issues raised regarding landholding access via the proposed road network, water and drainage.	<p>Manager's Response: LAP amended to include text to the effect that access to land parcels is to be provided at an access point on the proposed road network.</p>
17. Issues raised regarding access to landholdings, the undergrounding of powerlines and rewording of the policy with regards to the proposed greenway to allow for more flexibility when consulting with landowners at the design stage.	<p>Manager's Response: The Draft LAP was amended to clarify the planning guidelines in relation to land parcels and access arrangements which are to be clarified at the design stage. Other text amended to allow land parcels to be accessed from the proposed Glenamuck Link Distributer Road.</p>
18. SEA Statement: The EPA submission states that it is a requirement to prepare an SEA Statement outlining	<p>Response: Comments taken on board as part of this SEA Statement.</p>

Issue Raised	Response
<p>“Information on the Decision” – (Article 141 of Planning and Development Regulations as amended by Article 8 of the SEA Regulations). The statement should summarise the following:</p> <ul style="list-style-type: none"> ▪ How environmental considerations integrated into the Plan ▪ How the environmental report, submissions, observations and consultations have been taken into account during the preparation of the Plan ▪ The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with ▪ The measures decided upon to monitor the significant environmental effects of implementation of the Plan. <p>19. Copy of the SEA Statement with the above information to be sent to any Environmental Authority consulted during the SEA process.</p>	<p>Response: SEA Statement will be issued to all relevant Environmental Authorities once complete.</p>
<p>Amendments by Motion</p>	
<p>20. Amend text in Section 6.6.3, Policy E13</p>	<p>Manager’s Response: Policy amended to include new text to the effect that it is the Council’s objective to underground high voltage transmission lines in the LAP area and outlines the Councils’ intention to work with EirGrid, ESB Networks and other relevant stakeholders.</p>
<p>21. Amend text in Section 5.1.2, Policy MT01</p>	<p>Manager’s Response: Policy amended to include an additional bullet point acknowledging the need to reduce dependency on private car usage and the health/amenity benefits associated with the provision of on- and off- road cycle facilities.</p>
<p>22. Amend text in Section 5.4.3 Parking and Loading requirements</p>	<p>Manager’s Response: Policy amended to include new text to the effect that it is the Council’s objective to provide adequate parking and that CDP parking standards should apply to proposed retail and commercial developments in the LAP area in both the Neighbourhood Centre Lands and in the Employment Zoned Lands.</p>
<p>23. Amend the text on page 70 ‘Special</p>	<p>Manager’s Response:</p>

Issue Raised	Response
Conditions’.	Text replaced to the effect that any development proposals shall be guided by the Kiltiernan Neighbourhood Framework Plan’s general design principles.
24. Amend the text on page 79 ‘Special Conditions’.	Manager’s Response: Text replaced to the effect that any development proposals shall be guided by the Kiltiernan Neighbourhood Framework Plan’s general design principles.
25. Amend the text on page 80 ‘Special Conditions’.	Manager’s Response: Text replaced to the effect that any development proposals shall be guided by the Kiltiernan Neighbourhood Framework Plan’s general design principles.

As a result of the Managers Response the following changes have been made to the Draft LAP, as outlined in **Table 3.2**.

Table 3.2: Summary of Changes to Draft Local Area Plan

Number	Amendments from Managers Report/ Motion
1	Include a Map after page 35 entitled ‘Building Heights’, illustrating the building height provisions for each land parcel.
2	Amend Policy Objective V07 (P.13) to read: (new text in bold) The EU Directives for Environmental Impact Assessment (EIA), the Water Framework Directive, the Floods Directive and the and Strategic Environmental Assessment (SEA) are the fundamental policy framework of environmental protection measures and legislation for the delivery of the policies within this document and full compliance with the EIA and SEA Directives shall be provided
3	Amend Objective LHC1 (P.17) as follows: To ensure that planning applications have regard to take into account any existing groundwater protection schemes and groundwater source protection zones and/or the likely impacts that the development may have on groundwater.
4	Amend Objective LHC2 (P.17) as follows: To ensure the implementation of the EU Water Framework Directive , the EU Groundwater Directive and the protection of the groundwater resources in and around the Draft LAP and associated habitats and species.
5	Amend Section 3.1.5 (P.19 Paragraph 6) as follows: Notwithstanding, any recommendations of the Eastern Catchment Flood Risk Assessment and Management (CFRAM) Study and the Flood Risk Management Plan, when published, will be implemented in full along with the requirements of the Eastern River Basin Management Plan and associated Programme of Measures.
6	Amend Objective OS03 (P.48) as follows: To acknowledge and respect areas of ecological importance, local topography, watercourses, hedgerows, woodlands, mature trees and views when providing open space and to ensure the protection of ecological linkages when providing open space within the Plan area.
7	Amend Objective MT01 (P.36) To read:

Number	Amendments from Managers Report/ Motion
	<p>To reduce the need for travel by private car within the LAP by:</p> <ul style="list-style-type: none"> • facilitating appropriate frequencies and routings of bus services to address increased population levels, including good linkages to proposed LUAS Line B1 station at Ballyogan Wood Luas stop on the Luas Green Line.
8	<p>Amend Draft LAP as follows:</p> <p>Section 5.3.1 Primary Road Network (P.39 End para. 3) add the following:</p> <p>The Council will develop proposals for the operation of the 'bus-gates' at the detailed design stage for the proposed new road network. The Council will consider whether the bus-gates should operate at 'peak-times' only, with little or no restrictions at other times of the day.</p>
9	<p>Amend the Draft LAP as follows:</p> <p>Amend Section 10.6 'Interim Proposal to Accommodate Development'</p> <p>P. 56 left column, final paragraph</p> <p>Dun Laoghaire-Rathdown's Transportation Department considers that up to 4,000 700 dwelling units could be accommodated on an upgraded existing road network (Phase 1). The development of units additional units in excess of these 4,000 700 dwelling units would, however, require the construction</p> <p>P. 56 right column, second paragraph</p> <p>Outlined below are the recommended planning criteria to be used in the assessment of planning applications for development of up to 4,000 700 dwelling units (Phase 1).</p> <p>P.57, left column</p> <p>PHASE 1 (a) to comprise c. 500 350 dwelling units:</p> <p>A. GLENAMUCK ROAD UPPER/NORTH PORTION (c. 300 200 dwelling units)</p> <p>This area encompasses the lands designated as 'mediumhigher density residential' at the northern section of Glenamuck Road.</p> <p>B. NODE AT JUNCTION OF ENNISKERRY AND GLENAMUCK ROADS (c. 200 150 dwelling units)</p> <p>This area includes the lands designated as 'medium density residential' to the east of the Enniskerry Road. Any proposed developments must include the improvement of Glenamuck Road.</p> <p>PHASE 1 (b) to comprise c. 500 350 dwelling units:</p> <p>C. CONCENTRATED AT VILLAGE CORE / ALONG ENNISKERRY ROAD</p> <p>These lands include the lands zoned as 'Neighbourhood Centre' and 'Residential' along the Enniskerry Road. Development is dependent on the delivery of the Traffic Calming Scheme and must include the improvement of the Enniskerry Road through the 'Village Core.'</p>
10	<p>Amend the Draft LAP as follows:</p>

Number	Amendments from Managers Report/ Motion
	Include a 'Phasing Map' on Page 58, to illustrate the phasing proposals outlined in the Draft LAP on page 57.
11	<p>Amend the Draft LAP as follows:</p> <p>Include the following text in the Section 11, Planning Guidelines for Development Land Parcels – Development Parcel 2 (P.59)</p> <p>Access to land parcel to be provided at an access point on the GDDR.</p>
12	<p>Amend the Draft LAP as follows:</p> <p>Amend the following text in the Section 11, Planning Guidelines for Development Land Parcels – Development Parcel 27B (P.86):</p> <p>“To be accessed from existing Glenamuck Road. No access to site from proposed Link Road.”</p> <p>Detailed access arrangements to be clarified at planning application stage.</p> <p>Amend the following text in the Section 11, Planning Guidelines for Development Land Parcels – Development Parcel 27C (P.87):</p> <p>“To be accessed from existing Glenamuck Road. No access to site from proposed Link Road.”</p> <p>To be accessed from the proposed Glenamuck Link Distributor Road.</p>
13	<p>Amend the Plan as follow: Amend Section 6.6.3 Policy EI13 (p.46)</p> <p>It is an objective of the Council that high voltage transmission lines in the Plan area be undergrounded, both to improve the visual amenities of the area and to remove the constraints to development presented by the lines. To this end, the Council will work with Eirgrid, ESB Networks and other relevant stakeholders to encourage and/or facilitate the undergrounding of the Arklow-Carrickmines double circuit 220/110kV transmission line and the Carrickmines-Fassoroe 110kV transmission lines Nos. 1 and 2. Where undergrounding is not feasible, to sensitively incorporate any restriction corridors associated with said powerlines into the design of future developments.</p>
14	<p>Amend Section 5.1.2, Policy MT01 (Page 36) to include an additional bullet point in the text box as follows:</p> <p>To reduce the need for travel by private car within the LAP and to acknowledge the amenity and health benefits of off-road recreational cycling by providing both on-road and complementary off-road cycling facilities within the Plan area.</p>
15	<p>Add text to Section 5.3.4 Parking and Loading Requirements (P.41, after third paragraph)</p> <p>It is an objective of the Plan that adequate parking should be provided and in this regard, the parking standards as set out in the 2010-2016 County Development Plan will fully apply to commercial and retail developments which are proposed both in the Neighbourhood Centre lands and the Employment zoned lands in the Plan area.</p>
16	<p>Amend Plan as follows:</p> <p>Page 70 'Special Conditions' (at foot of page)</p> <p>Replace text as follows:</p>

Number	Amendments from Managers Report/ Motion
	<p>Lands to be developed in accordance with the objectives of the Kiltiernan Neighbourhood Framework Plan</p> <p>Any development proposals shall be guided by the general design principles of the Kiltiernan Neighbourhood Framework Plan.</p> <p>Page 79 'Special Conditions' (at foot of page)</p> <p>Replace text as follows</p> <p>Any development proposals should have regard to the Kiltiernan Neighbourhood Framework Plan</p> <p>Any development proposals shall be guided by the general design principles of the Kiltiernan Neighbourhood Framework Plan.</p> <p>Page 80 'Special Conditions' (at foot of page)</p> <p>Replace text as follows</p> <p>Any development proposals should have regard to the Kiltiernan Neighbourhood Framework Plan</p> <p>Any development proposals shall be guided by the general design principles of the Kiltiernan Neighbourhood Framework Plan.</p>

No significant impacts as a result of implementing the proposed amendments were identified and therefore no mitigation measures were proposed by the SEA/ AA team.

3.3 ADOPTION OF KILTIERNAN/ GLENAMUCK LOCAL AREA PLAN

The Kiltiernan/ Glenamuck Local Area Plan 2013 – 2019 was adopted at a Council meeting on 9th September 2013. The LAP 2013 was generally adopted in accordance with the Manager's Recommendations with respect to submissions.

4 REASONS FOR CHOOSING THE PREFERRED ALTERNATIVE

In line with the requirements of the SEA Directive and the corresponding implementation of Irish legislation (S.I. 436 of 2004), as amended, consideration was given to reasonable alternatives for delivery of the Kiltiernan/ Glenamuck Local Area Plan 2013-2019. Article 5 of the SEA Directive requires the environmental report to consider 'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme' and the significant effects of the alternatives selected. Alternatives must be realistic and capable of implementation and should present a range of different approaches within the statutory and operational requirements of the LAP. It is noted that a "Do Nothing" option has not been explored, as this is not considered reasonable, given the legislative requirement to update the LAP.

The strategic alternatives below were considered for assessment as part of the SEA process for the Kiltiernan/ Glenamuck LAP 2013-2019; they include:

- Scenario 1: Do – Minimum
- Scenario 2: Medium Density Approach
- Scenario 3: Mixed Range of Densities

A detailed assessment was undertaken analysing each Strategic Environmental Objective against the individual Alternatives with the summary of which is provided in the following **Table 4.1**.

Table 4.1: Alternative Scenario Assessment Results

Alternative Scenarios	Likely to Improve status of SEOs	Neutral interaction with status of SEOs	Potential Conflict with status of SEOs would be mitigated	Probable Conflict with status of SEOs – unlikely to be mitigated
Scenario 1			SEO2, SEO3, SEO5, SEO6, SE08	SEO1, SEO4
Scenario 2	SE07		SEO2, SEO3, SEO5, SEO6, SE08	SEO1, SEO4
Scenario 3	SEO2, SE05, SEO6, SE07, SE08		SEO3, SEO6	SEO1, SEO4

Scenario 3 is generally considered to be the most positive alternative when measured against the SEOs of the Environmental Report. Even though Scenario 3 provides for a high concentration of residential development, it does so in a planned and phased manner.

Environmental considerations relating to the Preferred Alternative can be summarised as follows:

- This scenario would be in compliance with the Core Strategy and relevant planning policies.
- As with the other scenarios this scenario will not have the ability to enhance biodiversity as there will be substantive loss of greenfield land.
- The phasing and sequencing of development and the adequate provision of infrastructure and environmental services would provide residences with a good quality of life as they would be living in area that is properly serviced.

- The provision of higher density residences in proximity to the Luas catchment will encourage sustainable transport and a reduction in energy usage.

5 MONITORING MEASURES

Article 10 of the SEA Directive (2001/42/EEC) requires Member States to monitor the significant environmental effects of the implementation of plans “in order, *inter alia*, to identify at an early stage unforeseen adverse effects to be able to undertake appropriate remedial action”. The primary purpose of monitoring is to cross-check significant environmental effects which arise during the implementation stage against those predicted during the plan preparation stage.

The Directive leaves considerable flexibility to Member States in deciding how monitoring shall be arranged, however it is generally agreed that a mixture of “quantitative and qualitative indicators” are required. The Directive recognises that the monitoring does not necessarily require new research activity and that existing sources of information can be used. In addition monitoring can be used to identify any information gaps and/or deficiencies that were identified as part of the SEA process. Furthermore, Government Guidelines state that monitoring should concentrate on the likely significant effects identified in the Environmental Report (former Department of Environment, Heritage and Local Government 2004).

Monitoring will be based around the SEA Environmental Objectives, Indicators and Targets. The Objectives, Indicators and Targets for the various environmental topics are set out below in **Table 5.1**. The Indicators chosen are at a level which is relevant to the Plan and are collated and reported on by a variety of government agencies including the EPA, NPWS and Archaeological Survey.

Monitoring proposals must concentrate on likely significant environmental effects, which have been identified in the Environmental Report and the measures identified as necessary to prevent, reduce, or offset any significant adverse effects. The indicators/monitoring will act as an early warning sign so that appropriate remedial action is undertaken.

Responsibilities and Frequency of Reporting

The statutory Manager’s Report on progress in achieving objectives of the Kiltiernan/ Glenamuck Local Area Plan 2013-2019 takes place two years after the adoption of the Local Area Plan and “shall include information in relation to the progress on, and the results of monitoring the significant environmental effects of implementation of the plan”. If an objective or policy is having a significant adverse effect, a variation may be considered during the lifetime of the Local Area Plan. It is largely the responsibility of Dún Laoghaire-Rathdown County Council to undertake the monitoring and to interpret the monitoring data relevant to Kiltiernan/ Glenamuck.

Table 5.1: Monitoring and Reporting Programme as Outlined in the SEA

Objectives	Targets	Indicators	Source/ Responsibility
Objective 1 Biodiversity, Flora & Fauna Protect and where appropriate, enhance biodiversity, particularly protected areas and protected species.	No net loss of designated sites, species or habitats.	Reported/ Estimated levels of damage to designated sites/ species/ habitats as identified by GIS and AA. No. of Appropriate Assessments Carried out. Number of planning permissions with biodiversity conditions ensuring no net loss of green linkages / ecological networks. Loss of land actively managed for conservation.	NPWS DLRCC Planning/ Environment Department
	No net loss of green	Loss of green linkages/	DLRCC

Objectives	Targets	Indicators	Source/ Responsibility
	linkages / ecological networks	ecological networks identified through GIS and Habitat Mapping	Environment Department/ GIS
	Prevent further spread of alien/ invasive species.	Number of spites reported to contain alien/ invasive species.	NPWS DLRCC Environment Department
<p>Objective 2</p> <p>Population</p> <p>Improve people's quality of life based on high-quality residential, working and recreational environments and on sustainable transport</p>	No increase in population above core strategy population targets	% change in population based on core strategy targets based on RPG figures.	CSO
	Appropriate mix of tenure types (including social housing) in all new developments.	% of private and social housing in new developments % mix of tenures based on housing strategy requirements.	DLRCC Planning and Housing Departments
	All significant planning applications for new residential developments within areas designated for expansion to be accompanied by a design statement.	% of significant planning applications granted for new residential developments that are accompanied by a design statement.	DLRCC Planning Department
	Increase access to public transport from households.	Construction/ improvement of footpaths/ greenways/ cycle infrastructure	DLRCC Roads Department
<p>Objective 3</p> <p>Water</p> <p>Improve water quality and the management of watercourses to comply with the standards of the Water Framework Directive and incorporate the objectives of the Floods Directive into sustainable planning and development.</p>	Implementation of the Programme of Measures identified under the ERBD River Basin Management Plan.	% increase in waters achieving 'good status' as defined in the WFD.	EPA and DLRCC Environment Department
	Ensure wastewater collection system capacity is provided either prior to construction of new development or is developed in parallel.	Wastewater collection system capacity compared with wastewater collection demand from development in the LAP.	EPA and DLRCC Environment Department
<p>Objective 4</p> <p>Soil</p> <p>Protect and, where appropriate, enhance the function and quality of the soil resource in the lands within Kiltiernan/ Glenamuck Draft LAP.</p>	Increase in any derelict buildings being redeveloped	Number of derelict buildings being redeveloped based on commencement notices	Commencement notices
<p>Objective 5</p> <p>Climate Change</p> <p>Contribute to mitigation of, and adaptation to, climate change.</p>	All new development applications within areas at risk of flooding to submit a flood impact assessment.	Number of new development applications within areas at risk of flooding without flood impact assessment.	DLRCC Planning Department
	Increase access by households to sustainable forms of	Passenger numbers Funding allocated to	DLRCC Planning and Roads

Objectives	Targets	Indicators	Source/ Responsibility
	transport, including bus and rail services.	improvement of walking and cycling facilities.	Department
Objective 6 Cultural Heritage Protect and, where appropriate, enhance the character, diversity and special qualities of cultural, architectural and archaeological, heritage within Kiltiernan/ Glenamuck Draft LAP.	No impact on the fabric or setting of monuments on the Record of Monuments and Places (RMP) by development granted planning permission.	Number of monuments on the RMP, impacted by granted planning permissions.	The Archaeological Survey monitoring programme, Ireland
	No impacts on the architectural heritage value or setting of protected structures by development granted planning permission.	Number of protected structures impacted by development granted planning permission.	Buildings at Risk Register, Heritage Council Ireland. DLRCC Planning Department
	No protected structures to be demolished because of long term neglect and dereliction.	Number of protected structures that have been demolished because of long term neglect and dereliction.	Buildings at Risk Register, Heritage Council Ireland. DLRCC Planning Department
Objective 7 Landscape Protect and, where appropriate, enhance the character, diversity and special qualities of landscapes in Kiltiernan/ Glenamuck Draft LAP.	No negative alteration to protected views.	Number of visual impact assessments received as part of development proposals	DLRCC Planning Department
	No planning permission granted within special qualities of landscapes that materially contravene the policies or objectives of the LAP.	Number of planning permissions granted which materially contravene the special qualities of landscapes.	DLRCC Planning Department
Objective 8 Material Assets Make best use of existing infrastructure and promote the sustainable development of new infrastructure.	Minimise the % of unaccounted for water. This refers to leakage from the system.	% unaccounted for water	EPA
	Increase in planning permissions making provision for renewable energy and water conservation measures.	No of planning permissions making provision for renewable energy and water conservation measures.	DLRCC Planning Department

6 ADDENDUM TO THE ENVIRONMENTAL REPORT

The EPA submission received during the second period of consultation outlined several points in relation to the SEA Environmental Report. These points are acknowledged by the SEA and AA team and it is proposed to incorporate these considerations into future strategic environmental assessments.

It is acknowledged that the Non Technical Summary of the SEA Environmental Report could include a summary of each alternative development scenario. In addition, if any cumulative effects are identified during the SEA process, these should be summarised in the Non Technical Summary. The SEA Environmental Report should provide suggestions if required to address any significant effects. Additionally, a sensitivity map could be included in both the Non Technical Summary and in the Environmental Report to illustrate the potential significant environmental issues which an LAP should take into account. In the case of the Kiltiernan/ Glenamuck Environmental Report a number of maps were included that outlined the baseline issues within and surrounding the LAP.

The coding system between Table 1.4 and Table 1.5 outlined in the Environmental Report was unclear and has been clarified in **Table 6.1** below.

Table 6.1: Explanation of SEO Coding System

Objective 1 Biodiversity Flora and Fauna (BFF)	Protect and where appropriate, enhance biodiversity, particularly protected areas and protected species.	SEO1
Objective 2 Population (P)	Improve people's quality of life based on high-quality residential, working and recreational environments and on sustainable transport.	SEO2
Objective 3 Water (W)	Improve water quality and the management of watercourses to comply with the standards of the Water Framework Directive and incorporate the objectives of the Floods Directive into sustainable planning and development.	SEO3
Objective 4 Soil (S)	Protect and, where appropriate, enhance the function and quality of the soil resource in the lands within Kiltiernan/ Glenamuck Draft LAP.	SEO4
Objective 5 Climate (C)	Contribute to the mitigation of, and adaptation to, climate change.	SEO5
Objective 6 Cultural Heritage (CH)	Protect and, where appropriate, enhance the character, diversity and special qualities of cultural, architectural and archaeological, heritage within Kiltiernan/ Glenamuck Draft LAP.	SEO6
Objective 7 Landscape (L)	Protect and, where appropriate, enhance the character, diversity and special qualities of landscapes in Kiltiernan/ Glenamuck Draft LAP.	SEO7
Objective 8 Material Assets (MA)	Make best use of existing infrastructure and promote the sustainable development of new infrastructure.	SEO8

It is acknowledged that Table 7.3 within the SEA Environmental Report covering the SEOs, Targets and Indicators, and Table 12.1 covering Mitigation Measures could include an additional indicator to the Water Objective. **Table 6.1** highlights the suggested change, in blue text, to both tables in the Environmental Report.

Table 6.2: Suggested Addition to Tables 7.3 and 12.1 of the SEA Environmental Report

Objective	Targets	Indicators	Source/ Responsibility
<p>Objective 3</p> <p>Water</p> <p>Improve water quality and the management of watercourses to comply with the standards of the Water Framework Directive and incorporate the objectives of the Floods Directive into sustainable planning and development.</p>	Implementation of the Programme of Measures identified under the ERBD River Basin Management Plan.	<p>% increase in waters achieving 'good status' as defined in the WFD.</p> <p>% decrease in waters achieving 'good status' as defined in the WFD.</p>	EPA and DLRC Environment Department
	Ensure wastewater collection system capacity is provided either prior to construction of new development or is developed in parallel.	Wastewater collection system capacity compared with wastewater collection demand from development in the LAP.	EPA and DLRC Environment Department

The following clarification is given in relation to a submission query from the EPA asked the question as to whether different phases of development are proposed for the lifetime of the Plan or over several Plan periods. The Dún Laoghaire County Development Plan Core Strategy includes for phases of development for the Kiltiernan/ Glenamuck area that may span more than one LAP cycle. The Council is satisfied that that Kiltiernan/ Glenamuck LAP is fully consistent with the Core Strategy in terms of quantum of development that have been proposed. The Manager is satisfied that this phasing policy will ensure that development will proceed only if requisite infrastructure is in place. The precise timing of this development over the next 4 to 6 to 8 years is impossible to forecast with any accuracy at this juncture.

Also, Dún Laoghaire-Rathdown will apply consideration to the monitoring of Objective 5 (Climate Change) to take into account the use of public transport and other sustainable commuting options over private means of transport.

APPENDIX A

SUBMISSION FROM EPA, DCENR, DOECLG

D005

Kiltiernan/Glenamuck LAP

From: Cian O'Mahony [c.omahony@epa.ie]
Sent: 21 June 2013 14:41
To: Kiltiernan/Glenamuck LAP
Subject: EPA Submission Re. Draft Kiltiernan Glenamuck Local Area Plan 2013
Attachments: SCP121208.2 EPA Submission KiltiernanGlenamuck_LAP Cover.pdf; SCP121208.2 EPA Submission KiltiernanGlenamuck_LAP_Comments.pdf

Dear Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 21st May 2013, regarding the above. Please find attached the Environmental Protection Agency's submission in relation to the Draft Kiltiernan Glenamuck Local Area Plan (hereafter referred to as "*the Plan*"), and the associated SEA Environmental Report.

This submission is intended to promote the following:

- full and transparent integration of environmental considerations in the Plan;
- the integration of the Plan-making and SEA processes; and,
- compliance with the requirements of the SEA Directive and associated Regulations.

Future Amendments to the Draft Plan

Where amendments to the Plan are proposed, these should be screened for likely significant effects in accordance with the criteria as set out in Schedule 2A of the SEA Regulations and should be subject to the same method of assessment applied in the "environmental assessment" of the Draft Plan.

SEA Statement – "*Information on the Decision*"

Following adoption of the Plan, an SEA Statement, should summarise the following:

- How environmental considerations have been integrated into the Plan;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Plan;
- The reasons for choosing the Plan adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.

Should you have any queries or require further information in relation to the above please contact the undersigned.

I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely

24/06/13



Cian O'Mahony
Scientific Officer
SEA Section
Office of Environmental Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork

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1005



Senior Executive Officer
Planning and Enterprise Department
Dún Laoghaire-Rathdown County Council
County Hall
Marine Road
Dun Laoghaire

St	
COPIED	

21st June 2013

Our Ref: SCP121208.2

Re. Draft Kiltiernan Glenamuck Local Area Plan 2013

Dear Sir/Madam,

The Environmental Protection Agency (EPA) acknowledges your notice, dated 21st May 2013, regarding the above. Please find attached the Environmental Protection Agency's submission in relation to the Draft Kiltiernan Glenamuck Local Area Plan (hereafter referred to as "*the Plan*"), and the associated SEA Environmental Report.

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- The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

A copy of the SEA Statement with the above information should be sent to any environmental authority consulted during the SEA process.



Should you have any queries or require further information in relation to the above please contact the undersigned.

I would be grateful if an acknowledgement of receipt of this submission could be sent electronically to the following address: sea@epa.ie.

Yours sincerely

Cian O'Mahony
Scientific Officer
SEA Section
Office of Environmental Assessment
Environmental Protection Agency
Regional Inspectorate
Inniscarra, County Cork



Draft Kiltiernan Glanamuck Local Area Plan and Strategic Environmental Assessment (SEA) Environmental Report Environmental Protection Agency Comments 21st June 2013

The comments below relate to the integration of the environmental considerations and recommendations that have been set out in the Environmental Report, as well as the additional information highlighted by the EPA, within the Kiltiernan Glanamuck Local Area Plan, referred hereafter to as “the Plan”. Suggestions are put forward for consideration with a view to addressing the integration of a number of key environmental considerations within the Plan.

The EPA is a statutory Environmental Authority under the SEA Regulations. The EPA’s role in SEA in relation to Land Use Plans focuses on promoting full integration of the findings of the Environmental Assessment into the Plan. It is not the function of the EPA to either approve or enforce Land Use Plans.

It is clear that the Draft Plan has taken the key environmental considerations and recommendations identified in the SEA Environmental Report into account in the preparation of the Plan. In particular it is clear that biodiversity, water quality, ecological linkages, flood risk, critical service infrastructure provision, landscape character and traffic/noise pollution management have been integrated to a significant degree into the Plan and environmentally sustainable development is being promoted through specific objectives and policies.

SECTION 1: DEVELOPMENT PLAN

The comments below relate to the Development Plan. Comments and suggestions in this Section are put forward for consideration and mainly relate to the key stages and outputs of the SEA Process.

Chapter 2 – Overall Strategy

Consideration should be given in Primary Objective VO7 to also including a reference to the Water Framework Directive and Floods Directive.

Chapter 3 Landscape, Heritage and Conservation

In Objective LHC1, consideration should be given to amending as follows “*To ensure that planning applications ~~have regard to~~ take into account any existing groundwater protection schemes...*”

Objective LHC2 should also take into account the Water Framework Directive also in terms of protecting groundwater quality.

In *Section 3.1.5 Water Catchment Areas & Surface Drainage*, the specific objectives relating to implementation of the Floods Directive, integration of the Eastern CFRAMS, application of the Flood Risk Management Guidelines (DEHLG, 2009), integration of Appropriate Assessment considerations under the Habitats Directive, provision of riparian corridors and incorporation of fisheries guidance are acknowledged. The commitment to consulting with the NPWS in relation to lighting provision adjacent to river corridors is also noted.



There would also be merits in including an objective in this section relating to integration of the relevant aspects of Eastern River Basin Management Plan and associated Programme of Measures.

Chapter 4 Residential Development

There would be merits in considering any existing unfinished estates within the Plan boundary, in the context of taking these into consideration in the projected housing needs and associated land use zoning proposals.

Chapter 7 Open Space and Recreation Strategy

In relation to Objective OSO-3, consideration should be given to including a commitment to protecting ecological linkages when providing open space within the Plan area.

There would also be merits in considering the establishment of a Green Infrastructure Strategy for the Plan area. In addition, in subsection 7.1.4 *Landscaping – specific* (paragraph 2) and subsection 7.1.5 *Hedgerows* (paragraph 2); the recommendations made in these paragraphs could be incorporated into specific objectives related to Green Infrastructure.

SECTION 2: ENVIRONMENTAL REPORT

The comments below relate to the Strategic Environmental Assessment Process and the Environmental Report. Comments and suggestions in this Section are put forward for consideration and mainly relate to the key stages and outputs of the SEA Process.

1. Non Technical Summary (NTS)

There would be merits in provided a summary of what each alternative development scenario is in the NTS. In addition, there may be merits in including a combined environmental sensitivity map highlighting potential significant environmental issues which the Plan should take into account in both the NTS and the Plan.

Consideration should also be given to reviewing the coding system between Table 1.4 and Table 1.5 as they do not appear to match in terms of selected objectives for the SEA. In addition, the environmental objectives used in the assessment of likely significant effects and assessment of alternative development scenarios should be highlighted in the NTS.

The inclusion of a section on Cumulative Effects is acknowledged, however there would be merits in considering summarising whether any potential for cumulative effects have been identified in the SEA and how the SEA Plan addresses any significant cumulative effects identified these.

2. Environmental Objectives

The Strategic Environmental Objectives as presented in Table 7.1 are noted. The assessment of the 'internal compatibility' of Strategic Environmental Objectives (Table 7.2) and the Table describing the list of strategic environmental objectives, targets and indicators (Table 7.3) are also noted.

In Table 7.3, in relation to Objective 3 (Water), consideration should be given to amending the Indicator to measure both %increase / %decrease in waters achieving 'good' status as



defined in the WFD. This should also be taken into consideration in *Chapter 12 Monitoring Measures - Table 12.1 Monitoring and Reporting Programme*.

3. Assessment of Environmental Effects

The alternatives put forward for consideration in the selection of a preferred development scenario are noted. Clarification, however, should be given whether the different phases of development are all proposed within the lifetime of the Plan or over different plan periods.

The impact assessment methodology used in assessing the Plan Policies/Objectives described in *Chapter 9 Evaluation of Local Area Plan Policies and Objectives*, clearly sets out and is acknowledged.

4. Mitigation Measures

Table 11.1 Mitigation Measures – Initial Measures Proposed is comprehensive and clearly sets out the overarching policies and objectives of the Plan and also the recommended changes to the Draft LAP, which involves the inclusion of additional policies. It is acknowledged that they have been reflected in the Plan.

The inclusion of *Table 11.2 Further Mitigation Measures*, which also provides a comprehensive list of recommendations to amend draft Policies/Objectives to further strengthen commitments to protect / manage environmental sensitivities/vulnerabilities and promote environmentally sustainable development, is also acknowledged.

5. Monitoring Measures

Chapter 12 Monitoring Measures Table 12.1 Monitoring and Reporting Programme sets out the objectives, targets indicators and responsibility for monitoring particular environmental criteria.

Consideration should be given in *Objective 5 - Climate Change*, to also take into account issues such as use of different commuting patterns and the use public transport / cycling / walking over private transport.

DO 18

Kiltiernan/Glenamuck LAP

From: CorporateSupport.Unit [CorporateSupport.Unit@dcenr.gov.ie]

Sent: 27 June 2013 12:24

To: Kiltiernan/Glenamuck LAP

Cc: Teresa O'Halloran

Subject: Draft Kiltiernan Glenamuck Local Area Plan 2013

27th June 2013

Senior Executive Officer,
Planning and Enterprise Department,
Dún Laoghaire-Rathdown County Council,
County Hall,
Marine Road,
Dún Laoghaire.

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Re: Draft Kiltiernan Glenamuck Local Area Plan 2013

Dear Sir/Madam,

I refer to a letter of the 21st May 2013 in the above regard.

The Department of Communications, Energy and Natural Resources on behalf of Inland Fisheries Ireland wish to make the following comments at this time.

'IFI notes and welcomes provisions made for protection of the aquatic environment by DLRCoCo in revision of LCH8 and in Section 6.3 of the draft plan. We have no further observations to make at this time.'

Kind regards,

Frances Dunne,
Corporate Support Unit,
DCENR,
Phone 01 6783084.



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DOS 1

Kiltiernan/Glenamuck LAP

From: Margaret Killeen - (DECLG) [Margaret.Killeen@environ.ie]

Sent: 28 June 2013 15:34

To: Kiltiernan/Glenamuck LAP

Subject: Re: Draft Kiltiernan Glenamuck LAP

Attachments: Letter to LA 28 June.doc; ATT00001.txt; ATT00002.htm

Attached please find comments from the Minister for the Environment, Community and Local Government on the above proposal. Hard copy to follow.

Please acknowledge receipt of this email.

Thanking you,

Margaret Killeen

Planning Section

Ph: 01-8882418

Margaret.Killeen@environ.ie



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DOS/



Comhshaol, Pobal agus Rialtas Áitiúil
Environment, Community and Local Government

28 June, 2013.

Senior Executive Officer
Planning and Enterprise Dept.
Dun Laoghaire-Rathdown County Council
County Hall
Marine Road
Dun Laoghaire
Co. Dublin.

Re: Draft Kiltiernan Glenamuck Local Area Plan

A Chara,

I am directed by the Minister for the Environment, Community and Local Government to refer to your recent letter in relation to the above and set out hereunder observations on behalf of the Minister.

The Department notes that the Council has prepared a well presented and legible document. Notwithstanding, a number of issues have arisen which would benefit from further clarity to ensure that the LAP is properly aligned with the County Development Plan and facilitate its reading by third parties as set out below.

It is noted that the draft LAP is not entirely consistent with the area and residential unit numbers of the Core Strategy table '*Disposition & Estimated Phasing/Delivery of Residential Units 2011-2022*'. Further consideration is needed to ensure that the LAP is properly aligned with the Core Strategy of the County Development Plan; that the number of housing units now proposed and the larger LAP area, can be justified on an evidence base, and that at the amendments display stage, a phasing plan indicates the Phase 1 area which relates to the housing units proposed under the Core Strategy for the proposed LAP plan period (2013-2019) with a Phase 2/3 for the period after 2019.

It would also be useful if this information is supported by a simple clear table that illustrates the quantitative relationship between the LAP and the wider spatial context of the County Development Plan.

Heights Strategy

It would be very useful, particularly for third parties reading the LAP, if a map was provided which indicated the proposed heights policy.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Patrick O'Sullivan". The signature is written in a cursive style with a large initial "P" and "O".

Patrick O'Sullivan
Planning Section