



Addendum I SEA Environmental Report



Environmental Consequences of the Proposed Material Alterations to the Draft Ireland West Airport Knock Local Area Plan 2012-2018

**Mayo County Council
Comhairle Contae Mhaigh Eo
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**Prepared in Accordance with Section 20(3)(e) of the Planning and
Development Act 2000-2010**

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Introduction

This is the first addendum to the Environmental Report on the Strategic Environmental Assessment of the draft Ireland West Airport Knock Local Area Plan 2012-2018. This document identifies the environmental consequences of the Proposed Material Alterations to the draft LAP as resolved by the Elected Members of Mayo County Council at the Special Council Meeting on Monday 23rd July 2012.

It should be noted that changes are not made to the original Environmental Report; this Addendum forms part of the documentation of the ongoing SEA/LAP making process. It supplements and should be read in conjunction with the Environmental Report.

The findings of this report will be used to update the Environmental Report on adoption of the LAP. The updated Environmental Report will be made available to the Public and accompany the Ireland West Airport Knock Local Area Plan when adopted.

This document should be read in conjunction with the document entitled ‘Proposed Material Alterations to the Draft Ireland West Airport Knock Local Area Plan 2012-2018’ which details the changes made to the draft LAP by the Proposed Material Alterations. This document will assess the environmental consequences of the Proposed Material Alterations.

The following coding is used to show the changes made to the draft LAP as a result of the proposed material alterations

Black Text = Text in the draft LAP as published

~~Black Text with a strikethrough~~ = text in the draft LAP to be deleted as a result of the Proposed Material Alterations

Red Text = text added to the draft LAP as a result of the Proposed Material Alterations

Environmental Consequences of the Proposed Material Alterations

1.1 Proposed Material Alteration MA1

MA1 relates to Section 4.3 of the draft LAP. Alterations to Section 4.3 as a result of MA1 are detailed below.

4.3 Airport Development Zone

4.3.1 Introduction

A primary aim of the LAP is to facilitate the development potential of Ireland West Airport Knock as a strategic economic/enterprise hub for the Region. In order to achieve this aim, it is necessary to attract inward investment to the LAP area through the development of an enterprise/business park.

Having regard to the analysis of the Strategic Environmental Assessment, the Appropriate Assessment and the Strategic Flood Risk Assessment, in addition to any restrictions relating to the Public Safety Zones. The most suitable location for the development of an enterprise/business park is in the Airport Development Zone.

It is projected by the Airport Development Company's business plan that an enterprise/business park could accommodate a total of 50,000m² of gross floor area

over a 20 year period. The LAP is a framework for the future development of the LAP area beyond its 6 year life span and is a precursor to its' designation as a Strategic Development Zone.

~~There is approximately 56 Ha of undeveloped lands within the Airport Development Zone. Taking a density of 1000m² of development per 0.5 Ha of land (see density calculations in Appendix 5) the enterprise/business park would require a land take of 25ha. The development of the enterprise/business park should be a plan led approach to avoid piecemeal and ad-hoc development. This should be carried out under the framework of a masterplan.~~

~~A masterplan for the enterprise/business park shall be prepared by the developers/landowners of the lands within the Airport Development Zone working together to develop the area in a comprehensive sustainable manner. The masterplan approach is detailed in Section 4.3.2 and is considered critical in the event that an SDZ is not designated for the LAP area.~~

There is approximately 56 Ha of undeveloped lands within the Airport Development Zone. Taking a density of 1000m² of development per 0.5 Ha of land (see density calculations in Appendix 5) the enterprise/business park would require a land take of 25 Ha. The development of the enterprise/business park should be a plan led approach to avoid piecemeal and ad-hoc development.

The designation of the Local Area Plan area as a Strategic Development Zone (SDZ) will require the preparation of Planning Scheme which will direct the development of the SDZ in a comprehensive, sustainable manner. Until such time as the Planning Scheme for the SDZ is approved planning applications will be considered on their own merit and in accordance with the Land Use Zoning and Objectives of this Local Area Plan.

4.3.2 Enterprise/Business Park Masterplan

~~The area of the Airport Development Zone for which a masterplan should to be prepared is approximately 25Ha. Developers/landowners should co-operate with each other in the preparation of the masterplan (Section 4.3.3)~~

~~A masterplan approach will assist in the planning of lands in a comprehensive manner, demonstrating how the development of the lands can relate to each other ensuring issues such as land assembly, shared access, open space and landscaping are adequately addressed.~~

The Masterplan will:

- ~~• identify the location for the 25Ha required for the enterprise/business park~~
- ~~• include a topographical assessment~~
- ~~• include an Environmental Management Report as set out in Section 6.3~~
- ~~• identify the phases and densities for development set out in Section 4.3.4 and Appendix 6~~
- ~~• provide an architectural and urban design palette as set out in Section 6.4~~
- ~~• comply with all other requirements of the Design Standards and Guidance set out in Section 6~~

~~The masterplan should be approved by the planning authority and subsequently used as part of the formal planning application process to demonstrate how development proposals fit into the masterplan context.~~

~~4.3.3 Land Ownership, Co-operation and Profit Sharing~~

~~As the lands within the Airport Development Zone may not be in single ownership, it is recommended that landowners/developers work together in the preparation of the masterplan and enter into a legal agreement, applying an equal value to all lands within the site and agreeing on a profit sharing scheme based on a percentage of the overall masterplan site owned by each landowner. This would avoid difficulties whereby lands with less valuable uses, as per the masterplan, are not released/developed. Following agreement between the Council and the landowners/developers on the masterplan, planning permission for any development proposal must be obtained through the normal planning process. If agreement cannot be reached between landowners/developers, then the masterplan should be prepared excluding the lands in question. Any development proposals on lands outside of the masterplan area should demonstrate how it fits into the overall development strategy of the masterplan and LAP. The legal rights of owners and occupiers of land within the Airport Development Zone are not affected by this designation.~~

4.3.2 Land Ownership, Co-operation and Profit Sharing

As the lands within the SDZ are not in single ownership, it is recommended that landowners/developers work together in the preparation of the SDZ Planning Scheme.

1.1.1 Environmental Consequence of MA1

MA1 removes the requirement to prepare a masterplan for the Airport Development Zone which provided a framework for the development of the LAP area. MA7 changes the framework to one based on individual development proposals until such a time as the LAP area is designated as a Strategic Development Zone. However, without the masterplan framework, development of the LAP area will still occur in a sustainable manner

1.1.2 Conclusion

Proposed Material Alteration MA1 would not change the assessment provided in the Environmental Report

1.2 Proposed Material Alteration MA2

As a consequence of the alterations in MA1 above, Objective SDO5 of the draft LAP is altered.

SDO5	It is an objective of the Council to ensure that the development all lands zoned as 'Airport Development' in Section 4 of this LAP is managed in a sustainable way through the framework of a masterplan (outlined in Section 4 of this LAP) are managed in a sustainable planned manner
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1.2.1 Environmental Consequence of MA2

The methodology for the evaluation of the policies and objectives of the draft LAP is outlined in Section 7 of the ER. The altered objective will be evaluated against the EPO's to determine if the change has an environmental consequence compared to the original objective.

	Likely to <u>Improve</u> status of EPOs	Probabl e <u>Conflict</u> with status of EPOs- unlikely to be mitigated	Potential <u>Conflict</u> with status of EPOs- likely to be mitigated by measures outlined in this SEA	<u>Uncerta</u> in interacti on with status of EPOs	<u>Neutral</u> Interactio n with status of EPOs	<u>No</u> <u>Likely</u> interact ion with status of EPOs
SDO5 incorporating MA2 It is an objective of the Council to ensure that the development all lands zoned as 'Airport Development' in Section 4 of this LAP is managed in a sustainable plan led manner.	SG1; W1-4; HP1-2; AR1; N1-2; C1; F1; R1-2; E1; DW1; WM1; CH2; L1		CH1; B1-2; WW1			
SDO5 as in Draft LAP It is an objective of the Council to ensure that the development all lands zoned as 'Airport Development' in Section 4 of this LAP is managed in a sustainable way through the framework of a masterplan (outlined in Section 4 of this LAP)	SG1; W1-4; HP1-2; AR1; N1-2; C1; F1; R1-2; E1; DW1; WM1; CH2; L1		CH1; B1-2; WW1			

The evaluation of the altered objective and the original objective against the EPOs show no change. This is to be expected as the change in framework from a masterplan process to an assessment on an individual basis through the development management process will ensure that the development of the LAP area occurs in a sustainable manner.

1.2.2 Conclusion

Proposed Material Alteration MA2 would not change the assessment provided in the Environmental Report, but would require the Environmental Report to be updated with the revised Objective SD05.

1.3 Proposed Material Alteration MA3

This Proposed Material Alteration relates to the Table 6 of the draft LAP and in particular to the 'Land Uses Generally Permitted' in the Airport Development Zone

Table 6: Land Use Zones and Land Uses Generally Permitted

Land Use Zone Objectives	Land Uses Generally Permitted
Airport Development Zone Objective: To facilitate appropriate development in order to strengthen the strategic role of IWAK as a key economic/enterprise hub for the Region, whilst protecting the future operations of the Airport.	<ul style="list-style-type: none"> To provide a high quality enterprise/business park development, in which the following uses are considered appropriate: <ul style="list-style-type: none"> airline sale reservation and booking offices, including call / e-mail centres airline, aircrew or pilot training centres / schools avionics, engine or aircraft parts, maintenance, supply and manufacture airport equipment and operational infrastructure, maintenance, supply and manufacture car hire operations and associated car parking requirements

	<ul style="list-style-type: none"> ○ flight packaging, provision services and supply units, including ramp services ○ in flight, hotel and terminal catering preparation and storage facilities ○ internal surface access and infrastructure including car parking associated with the main activities in the Airport Development Zone ○ offices for auxiliary and supporting functions ○ warehousing (non-retail uses associated with locating beside an airport)), cold stores and offices for airfreight handlers, forwarders and agents including parcels or post services ○ firms supplying the airport – those for whom a significant part of their activity relates to the airport ○ firms that are regular users of the airport ○ firms for whom the airport is seen as a prestigious location (e.g. Life Sciences or Information and Communications Technology) ○ businesses in sectors that contribute to regional employment (e.g.) Life Sciences, ICT, renewables, clean technology, light engineering, media and the arts ○ ancillary commercial activity providing services to employees within the LAP area ○ retail and other enterprises serving only the daily needs of those employed in the Airport Development Zone ○ businesses in sectors that contribute to regional employment, excluding retail ○ distribution services where it is demonstrated that suitable facilities are not available in the surrounding towns. ● Tourism related <ul style="list-style-type: none"> ○ hotel or other tourist related activity where it is clearly demonstrated the need to locate beside the airport) ● tourist related activity where the need to locate beside an airport is demonstrated ● hotel ● Utility Infrastructure projects ● appropriate renewable energy projects (must demonstrate they do not compromise or interfere with aircraft operations and/or safety)
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Conclusion

Land uses generally permitted in a Local Area Plan do not fall within the scope of the SEA process and are therefore not evaluated in the initial Environmental Report. Therefore Proposed Material Alteration MA3 is not considered to have an environmental consequence.

1.4 Proposed Material Alteration MA4

As a consequence of the alterations in MA3 above, Objective EO1 of the draft LAP is altered.

EO1	It is an objective of the Council to support the development of appropriate airport-related activities within the LAP area in accordance with the land use objectives set out in Section 4.
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1.4.1 Environmental Consequence of MA4

The methodology for the evaluation of the policies and objectives of the draft LAP is outlined in Section 7 of the ER. The altered objective will be evaluated against the EPO's to determine if the change has increased an environmental consequence compared to the original objective.

	<u>Likely to Improve</u> status of EPOs	<u>Probable Conflict</u> with status of EPOs- unlikely to be mitigated	<u>Potential Conflict</u> with status of EPOs- likely to be mitigated by measures outlined in this SEA	<u>Uncertain</u> interaction with status of EPOs	<u>Neutral</u> Interaction with status of EPOs	<u>No Likely</u> interaction with status of EPOs
EO1 incorporating MA4 It is an objective of the Council to support the development of appropriate activities within the LAP area in accordance with the land use objectives set out in Section 4.	HP1		CH1;; N1-2; AR1;E1; WW1; DW1; HP2; C1; F1; R1-2; SG1 ; B1-2	WM1; CH2;	W1-4	HP1
EO1 as in Draft LAP It is an objective of the Council to support the development of appropriate airport related activities within the LAP area in accordance with the land use objectives set out in Section 4.	HP1		CH1;; N1-2; AR1;E1; WW1; DW1; HP2; C1; F1; R1-2; SG1 ; B1-2	WM1; CH2;	W1-4	HP1

The evaluation of the altered objective and the original objective against the EPOs show no change. This is to be expected as the as the additional land uses will be assessed in the same manner for their potential impact on the environmental quality of the area and therefore no additional mitigation or monitoring will be required as a result of MA4

1.4.2 Conclusion

Proposed Material Alteration MA4 would not change the assessment provided in the Environmental Report but would require the Environmental Report to be updated with the revised Objective EO1.

1.5 Proposed Material Alteration MA5

MA5 relates to Section 6.2 of the draft LAP. Alterations to Section 6.2 as a result of MA5 are detailed below.

6.2 Sequential Approach to Development Proposals

In order to assist in the making of planning applications all development proposals will be required to demonstrate that the following sequential approach has been applied.

- a) does the development proposal comply with the land use zoning objectives and land uses categories generally permitted as set out in Table 6 (Appendix 1)?
- b) does the location for the type of development proposal comply with the Land Use Zoning Map (Appendix 1)?
- c) does the development proposal comply with:
 - Public Safety Zone requirements set out in Appendix 2
 - Aerodrome Safeguarding relating to Obstacle Limitation Surfaces requirements set out in Appendix 3
 - Noise Contour requirements set out in Appendix 4
- d) ~~does the development proposal comply with the master planning and phasing set out in Section 4~~

If the sequential approach set out above demonstrates that a development proposal is acceptable in principle, then the following development management standards and guidelines set out below shall be taken into consideration prior to submitting a planning application. The details required in the sections set out below are intended to assist applicants/developers in relation to the planning and design of any development proposal.

Conclusion

Approaches to assist in the making of a planning application do not fall within the scope of the SEA and is not evaluated in the initial Environmental Report. Therefore Proposed Material Alteration MA5 is not considered to have an environmental consequence.

1.6 Proposed Material Alteration MA6

MA6 relates to Section 6.3 of the draft LAP. Alterations to Section 6.3 as a result of MA6 are detailed below.

6.3 Environmental Management Report (EMR)

In order to assess the potential impact of any development proposal on the environmental quality of the area, ~~all development application shall be accompanied by an EMR.~~ the requirement for the submission or otherwise of an EMR shall be agreed with Mayo County Council prior to the submission of a planning application

The following subsections are a guide as to the content of the EMR. A list of guidance documents and reports are listed in Appendix 7 of this LAP as reference material that may aid in the compilation of the EMR. This is not an exclusive list of documents and others may also be referenced if considered appropriate to the relevant development proposal.

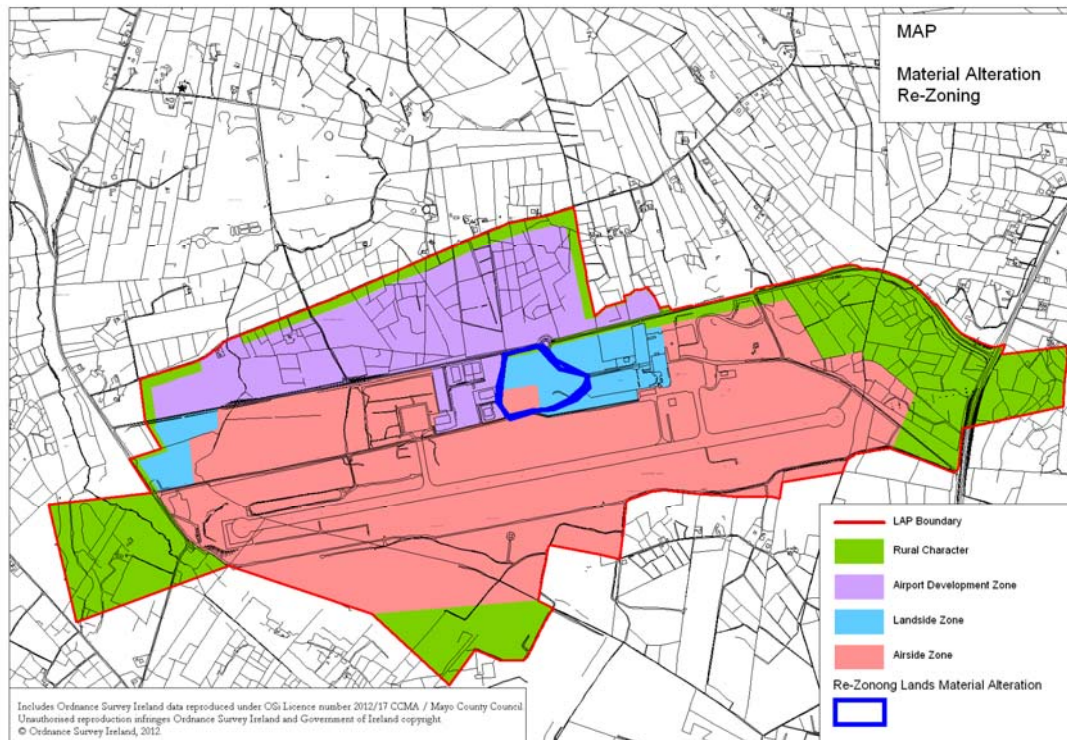
Conclusion

This is an approach to assist in the making of a planning application which does not fall within the scope of SEA and is not evaluated in the initial Environmental Report. Therefore Proposed Material Alteration MA6 is not considered to have an environmental consequence.

1.7 Proposed Material Alteration MA7

Re-zone lands shown Fig 1 below from Rural Character to Airside Zone and Landside Zone.

Fig 1: Map showing lands rezoned in accordance with Material Alteration



1.7.1 Environmental Consequence of MA7

The Methodology used to evaluate the re-zoning of the lands is based on the evaluation process of the Alternative Scenarios. (See Section 6 of the Environmental Report(ER)). This process sets out to evaluate how the changes made by the Material Alteration differ from the evaluation of the preferred scenario under Section 6 of the ER.

The table below shows the criteria for appraising the effects of the Material Alteration on the Environmental Protection Objectives and also includes the appraisal for the preferred scenario.

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	Likely to Improve status of EPOs	Probable Conflict with status of EPOs- unlikely to be mitigated	Potential Conflict with status of EPOs- likely to be mitigated by measures	Uncertain interaction with status of EPOs	Neutral Interaction with status of EPOs	No Likely interaction with status of EPOs
Material Alteration	R1; WM1; F1; AR1; E1; C1; HP2		W1; W2; W3; W4; CH1; HP1; L1; N1; N2; SG1 B1; B2; DW1		WW1; CH2; R2	
Preferred Scenario	R1; WM1; F1; AR1; E1; C1; HP2		W1; W2; W3; W4; CH1; HP1; L1; N1; N2; SG1 B1; B2		DW1; WW1; CH2; R2	
EPO Codes: B1-2 = Biodiversity, Flora & Fauna; HP1-2 = Population & Human Health; SG1 = Soils & Geology; W1-4 = Freshwater; AR1 = Air Quality; N1-2 = Noise; C1 = Climate Factors; F1 = Flooding; R1-2 = Roads and Transportation Infrastructure; E1 = Energy; WW1 = Waste Water; DW1 = Drinking Water; WM1 = Waste Management; CH1 = Cultural Heritage (Archaeology); CH2 = Cultural Heritage (Architectural Heritage); L1 = Landscape						

The evaluation of the LAP with the Material Alteration against the Preferred Scenario has indicated that One Environmental Protection Objective would be affected by MA7. This EPO relates to Drinking Water which seeks “to prevent deterioration of the status of water bodies with regard to quality, quantity and to improve water body status of rivers, lakes and ground water to at least good status as appropriate to the WFD, providing good sources of abstraction for drinking water”

The DW1 EPO moves from the column of “Neutral Interaction with status of EPOs” to the “Potential Conflict with status of EPOs-likely to be mitigated by measures” column.

1.7.2 Conclusion

MA7 would be likely to potentially conflict, if unmitigated, with the EPO relating to drinking water which seeks ‘to prevent deterioration of the status of water bodies with regard to quality, quantity and to improve water body status of rivers, lakes and ground water to at least good status as appropriate to the WFD, providing good sources of abstraction for drinking water’

Consequently MA7 would require the Environmental Report to be altered if it is adopted as part of the Plan. In particular the following changes would be required:

Objective HDO6 of the draft LAP should be changed, as resolved by the Elected Members in the Managers Report as a result of a submission to the draft LAP, to read as follows:

H06	It is an objective of the Council to continue to protect all waters, including rivers, lakes and ground water, in this regard any proposed development adjacent or close to such waters shall be carefully assessed to ensure that there is no adverse impact to the water or to any other water body into which it flows.
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The Surface Water Management Plan as part of the EMR report of the Draft LAP should be changed, as resolved by the Elected Members in the Managers Report as a result of a submission to the draft LAP, to read as follows:

Details relating to capacity predictions to ensure that the capacity of existing surface and ground waters are sufficient to accept new/increased discharges with no deterioration in current water body status.

This should be reinforced with an addition to Section 8.2.6 of the Environmental Report to include:

Mitigation 7 (Drinking Water)	Prepare Surface Water Management Plan to ensure that any discharges to ground waters do not cause deterioration in the current water body status
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