

# **Addendum I HDA Natura Impact Report**

Assessment of proposed Material  
Alterations to

**Draft Ireland West Airport Knock  
Local Area Plan 2012-2018**



In accordance with Section 20(3)(e) of the  
Planning and Development Acts 2000-2010

Mayo County Council  
July 2012





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## 1 Introduction

This is the first addendum to the Habitats Directive Assessment Natura Impact Report (NIR) for the Draft Ireland West Airport Knock Local Area Plan (LAP), prepared following a resolution by the members of Mayo County Council to make a number of Material Alterations to the Draft LAP at a Special Meeting of the Council on 23<sup>rd</sup> July 2012.

As the Natura Impact Report and its associated HDA for this draft LAP examined and evaluated the likely significant effects on the Natura 2000 network in the vicinity of the draft LAP, this Addendum 1 report assesses the likelihood of impacts as a result of the proposed Material Alterations to the draft LAP. As this document is an addendum to the Draft Ireland West Airport Knock LAP NIR, it should be read in conjunction with the original NIR, the Strategic Environmental Assessment (SEA) Environmental Report, Addendum 1 to the SEA Environmental Report and the document entitled *Proposed Material Alterations to the Draft Ireland West Airport Knock Local Area Plan 2012-2018*.

## 2 Proposed Material Alterations to the draft LAP

The proposed Material Alterations are described in the document *Proposed Material Alterations to the Draft Ireland West Airport Knock Local Area Plan 2012-2018* which documents the proposed material alterations to the Draft Local Area Plan. This section focuses on highlighting the material alterations proposed while the succeeding section will essentially assess the likely significant effects on Natura 2000 site(s) as a consequence of these alterations.

At the Special Meeting of 23<sup>rd</sup> July 2012 the members of Mayo County Council resolved to make a total of seven material alterations to the Draft Local Area Plan. These are set out below;

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

Black Text = Text in the draft LAP as published

~~Black Text~~ with a ~~strike through~~ = 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

### 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

... There is approximately 56 Ha of undeveloped lands within the Airport Development Zone. Taking a density of 1000m<sup>2</sup> 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. 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.~~



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.~~

#### **4.3.2 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.

#### **Proposed Material Alteration MA2**

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

<b>SDO5</b>	It is an objective of the Council to ensure that the development of all lands zoned as 'Airport Development' in Section 4 of this LAP are managed in a sustainable way through the framework of a masterplan (outlined in Section 4 of this LAP) <b>plan led manner.</b>
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### **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**

<b>Land Use Zone Objectives</b>	<b>Land Uses Generally Permitted</b>
<p><b>Airport Development Zone Objective:</b> 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.</p>	<ul style="list-style-type: none"> <li>• To provide a high quality enterprise/business park development, in which the following uses are considered appropriate: <ul style="list-style-type: none"> <li>○ airline sale reservation and booking offices, including call / e-mail centres</li> <li>○ airline, aircrew or pilot training centres / schools</li> <li>○ avionics, engine or aircraft parts, maintenance, supply and manufacture</li> <li>○ airport equipment and operational infrastructure, maintenance, supply and manufacture</li> <li>○ car hire operations and <b>associated car parking requirements</b></li> <li>○ flight packaging, provision services and supply units, including ramp services</li> <li>○ in flight, hotel and terminal catering preparation and storage facilities</li> <li>○ internal surface access and infrastructure including car parking <b>associated with the main activities in the Airport Development Zone</b></li> <li>○ offices <del>for auxiliary and supporting functions</del></li> <li>○ 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</li> <li>○ firms supplying the airport – those for whom a significant part of their activity relates to the airport</li> <li>○ firms that are regular users of the airport</li> <li><del>○ firms for whom the airport is seen as a prestigious location (e.g. Life Sciences or Information and Communications Technology)</del></li> <li>○ <b>businesses in sectors that contribute to regional employment (e.g.) Life Sciences, ICT, renewables, clean technology, light engineering, media and the arts</b></li> <li><del>○ ancillary commercial activity providing services to employees within the LAP area.</del></li> <li>○ <b>retail and other enterprises serving only the daily needs of those employed in the Airport Development Zone</b></li> <li>○ <b>businesses in sectors that contribute to regional employment, excluding retail</b></li> <li>○ <b>distribution services where it is demonstrated</b></li> </ul> </li> </ul>



	<p>that suitable facilities are not available in the surrounding towns.</p> <ul style="list-style-type: none"> <li>• <del>Tourism related</del> <ul style="list-style-type: none"> <li>○ <del>hotel or other tourist related activity where it is clearly demonstrated the need to locate beside the airport)</del></li> </ul> </li> <li>• tourist related activity where the need to locate beside an airport is demonstrated</li> <li>• hotel</li> <li>• Utility Infrastructure projects</li> <li>• appropriate renewable energy projects (must demonstrate they do not compromise or interfere with aircraft operations and/or safety)</li> </ul>
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#### **Proposed Material Alteration MA4**

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

<b>EO1</b>	It is an objective of the Council to support the development of appropriate <del>airport related</del> activities within the LAP area in accordance with the land use objectives set out in Section 4.
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#### **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 masterplanning 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.



### **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.

### **Proposed Material Alteration MA7**

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

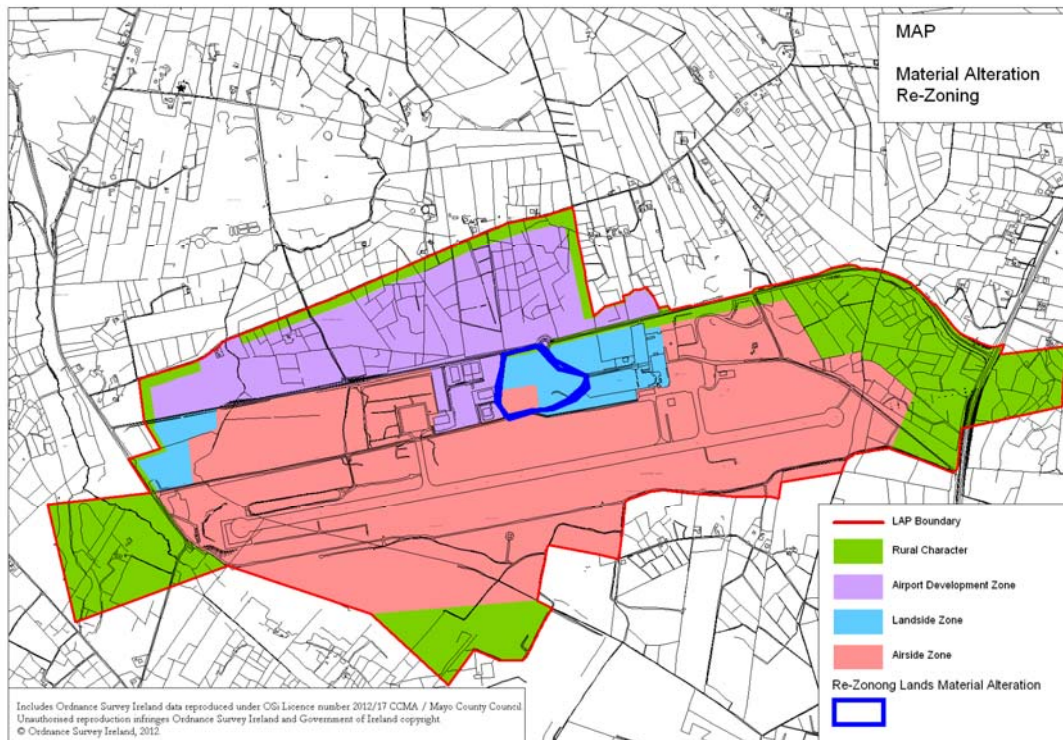


Figure 2.1 Draft Ireland West Airport Knock LAP zoning with Material Alteration





### 3 Assessment of Natura 2000 sites in consideration of proposed material alterations

The following table describes any potential likely significant effects on Natura 2000 sites as a consequence of the proposed material alterations illustrated in the preceding section.

Table 3.1 Proposed Material Alterations to the Draft Ireland West Airport Knock Local Area Plan and potential significant effect on Natura 2000 site with appropriate mitigation measure(s) wherever necessary

Proposed Material Alteration reference	Proposed Material Alteration interpretation	Natura 2000 site(s) potential significant effects and appropriate recommended mitigation
MA1	Section 4.3 describes the facilitation of development at Ireland West Airport Knock and the identification of the Airport Development Zone as the most suitable location for the development of an enterprise / business park. The proposed material alternation specifically proposes the replacement of a masterplan by the developers / landowners with a Planning Scheme for the SDZ (prepared by landowners/developers working together) and the direction of development in a comprehensive, sustainable manner, considering all planning applications on their own merit and in accordance with the Land Use Zoning and objectives of this LAP.	<p>Following the assessment of the Draft Ireland West Airport Knock LAP for it potential significant effects on Natura 2000 site(s) a number of mitigation measures were developed to avoid or offset these negative effects. This proposed Material Alteration has the objective of replacing a masterplan with a Planning Scheme for the strategic development zone (SDZ) and the direction of development in a comprehensive, sustainable manner, considering all planning applications on their own merit and in accordance with the Land Use Zoning and objectives of this LAP. Since it is therefore envisaged that all planning applications will be considered on their own merit, any potential negative effects on the Natura 2000 site(s) in the vicinity of the Draft Ireland West Airport Knock Local Area Plan and on their integrity will be offset by policy HP3 of the draft LAP:</p> <p>It is a policy of the Council to implement Article 6(3) of the EU Habitats Directive, and to subject any future plan or project arising from the Plan likely to impact on Natura 2000 or European Sites (SACs, SPAs), whether directly, indirectly or in combination with other plans or projects, to an appropriate assessment in order to inform the decision making process.</p>



MA2	Similar to MA1, this proposed material alteration refers to the exclusion of a masterplan <i>in lieu of</i> sustainable, plan-led development.	In the absence of a masterplan and the alternative of sustainable, plan-led development, the protection and conservation of Natura 2000 qualifying interests will be factored in by the evaluation of developments and planning applications on a case-by-case basis and the undertaking of Habitats Directive Assessment under Article 6(3) to assess the potential significant effects whenever deemed necessary, as per Policy HP3, therefore no impacts on Natura 2000 site(s) are envisaged as a result of this proposed material alteration.
MA3	Pertaining to land uses within the airport development zone, material alterations are proposed for car parking facilities, offices, specific businesses and enterprises.	The original NIR for the draft LAP concluded that there are potential significant effects as a result of airport development zone land uses (LAP policies and objectives relating to Airport infrastructure and operations) but it also ensured that airport infrastructure and development within the airport development zone will be subject to appropriate assessment under Article 6(3) of the Habitats Directive to examine potential significant impacts on the integrity of Natura 2000 site(s) and to offset effects with appropriate mitigation. This proposed material alteration is not envisaged to have any additional impacts and the measure proposed in the original NIR is still effective and inclusive.
MA4	This proposed material alteration is consequential to MA3 and relates to a subtle change from airport-related activities to appropriate activities within the Draft LAP, allowing for development of activities which are not specifically airport-related. In this way, activities which are not airport-related are not excluded.	All activities, including developments and planning applications relating to development activities are to be assessed on their own merits and in accordance with the objectives of this Draft LAP. Insofar as any development is envisaged to impact significantly on the integrity of the conservation objectives of Natura 2000 site(s) or is deemed to have the potential to impact significantly, whether or not it is an airport-related activity or not, does not alter the approach to development within the LAP area.
MA5	As a consequence of MA1 and the exclusion	The omission of the final test of the



	of the masterplan, this proposed material alteration pertains to planning applications of development proposals and the exclusion of question (d) relating to the masterplan.	sequential approach to the making of planning applications is not envisaged to have any impacts on the integrity of the conservation objectives of Natura 2000 site(s) as MA1 and MA2 demonstrated; this is due to the policy of undertaking a Habitats Directive Assessment to ensure that proposed developments do not have significant negative effects on any Natura 2000 site in the wider area. Appropriate Assessment (and pre-AA Screening) in accordance with Article 6(3) of the EU Habitats Directive will be undertaken to assess the impacts, or lack thereof on Natura 2000 site(s).
MA6	This proposed material alteration pertains to the submission of an Environmental Management Report (EMR) with development applications, to be agreed with Mayo County Council prior to the submission of a planning application, <i>in lieu of</i> with <b>all</b> development applications	Since the five policies and 12 objectives of the Draft LAP in relation to heritage and environment include an undertaking to <i>inter alia</i> , protect, conserve and restore environmental elements, it is subsumed that Mayo County Council will assess planning applications with environmental protection as a vital consideration. However, this proposed material alteration is not envisaged to impact on Natura 2000 site(s) as an appropriate assessment would be deemed necessary and requested of a developer, should a planning application be deemed to have potential significant effects on a Natura 2000 site(s); an EMR would not generally take into account the Natura 2000 network in as much detail as an Appropriate Assessment.
MA7	This proposed material alteration relates to the re-zoning of rural character zone with a combination of landside and airside zone	While the re-zoning of the rural character zone to a combination of landside and airside zone character may have the potential to impact significantly on the Natura 2000 site(s), the measure of subjecting all development applications within the landside and airside zone to Appropriate Assessment (and pre-AA Screening) in accordance with Article 6(3) of the EU Habitats Directive. Hence this proposed Material Alteration is not envisaged to have any additional effects on the integrity of



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the Natura 2000 site(s) than the original land zoning did, so long as development within the LAP area is assessed adequately and in accordance with Article 6(3) of the Habitats Directive.

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## **Conclusion**

This report has assessed the impacts that the proposed Material Alterations may have on the integrity of Natura 2000 site(s) as outlined above. Taking into account the Natura Impact Report (NIR) already prepared in respect of the Draft Ireland West Airport Knock LAP, it is not envisaged that the proposed Material Alterations will result in significant effects as long as the mitigation measures proposed in the original NIR are strictly adhered to.