

SEA STATEMENT

OF THE

MAYO COUNTY DEVELOPMENT PLAN 2008-2014 STRATEGIC ENVIRONMENTAL ASSESSMENT



for: Mayo County Council

Áras an Chontae

The Mall

Castlebar

County Mayo



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Section 1 Introduction

1.1 Terms of Reference

This is the SEA Statement of the Mayo County Development Plan (CDP) 2008-2014 Strategic Environmental Assessment (SEA).

1.2 SEA Definition

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a plan, or other strategic action, in order to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making on a par with economic and social considerations.

1.3 Legislative Context

Directive 2001/42/EC of the European Parliament and of the Council, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including land use planning.

The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI No. 435 of 2004), and, the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of regulations became operational on 21 July 2004.

The SEA Directive and the instruments transposing it into Irish Law require that after the adoption of a plan or programme, the plan or programme making authority is required to make a Statement available to the public, the competent environmental authorities and, where relevant, neighbouring countries. This Statement is referred to as an SEA Statement (DEHLG, 2004)¹.

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

1.4 Content of the SEA Statement

The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the plan,
- b) how
 - the environmental report,
 - submissions and observations made to the planning authority on the Draft Plan and Environmental Report, and
 - any transboundary consultations [this is not relevant to the Mayo County Development Plan].have been taken into account during the preparation of the plan.
- c) the reasons for choosing the plan, as adopted, in the light of the other reasonable alternatives dealt with, and
- d) the measures decided upon to monitor the significant environmental effects of implementation of the plan.

1.5 Implications of SEA for the Mayo CDP-Making Process

As a result of the aforementioned legislation, the Mayo County Development Plan 2008-2014 was required to undergo SEA.

The findings of SEA were expressed in an Environmental Report which was submitted to the Elected Members alongside the Draft Plan. The purpose of the report was to provide a clear understanding of the likely environmental consequences of decisions regarding the future accommodation of growth in County Mayo.

Amendments made to the Draft Plan at each stage of the process were evaluated for their environmental consequences and these were

presented to the Elected Members in the form of Addenda. On adoption of the Draft Plan, these Addenda were used to update the original Environmental Report into a final Environmental Report which accompanies the adopted Plan.

At each stage of the process the Elected Members were required by the legislation to take into account the Environmental Report - including the Addenda - before the adoption of the plan or programme.

Section 2 How Environmental Considerations were integrated into the Plan

2.1 Introduction

Environmental considerations have been integrated into the adopted Plan through a number of mitigation measures² which were recommended to be included in the Plan in the Environmental Report and as part of the plan-making process.

The measures recommended by the Environmental Report and their level integration into the Plan are identified in the sections below.

Environmental considerations which were integrated into the Draft Plan before it was put on display for the first time are identified in Section 2.6.

2.2 Spatial Strategies

Four areas are identified by the Environmental Report where likely development has a significant potential to conflict with elevated densities of environmental sensitivities (see Figure 2.1).

In order to sustainably facilitate necessary development in such areas the Environmental Report identified that it will be necessary to prepare a Spatial Strategy for each of the following centres or areas to assist in the preparation of future development plans or local area plans. These strategies will identify the location, significance and sensitivity of the range of environmental assets and constraints that occur within these particularly sensitive areas that are likely to comprise higher than average intensities of development.

² Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing a human action, be it a plan, programme or project. Mitigation involves ameliorating significant negative effects. Where there are significant negative effects, consideration should be given in the first instance to preventing such effects or, where this is not possible, to lessening or offsetting those effects.

1. The North West Coast
(from Benwee head to Achill)
2. South Clew Bay
(between Westport and Louisburgh)
3. North Lough Conn and the South-Eastern environs of Ballina
4. East Lough Mask/Lough Carra

Integration into the Plan:

The Spatial Strategy measures and the need to undertake them are identified under Section 3.16 - *Implementation* - of the Plan; however, these measures are not integrated into a policy or objective. It is noted that Figure 2.1 which was included in the Environmental Report was not included or referred to as part of any measure in the Plan.

2.3 Thematic Strategies

In addition to the Spatial Strategies the Environmental Report identified that specific areas in the County will need to prepare and separately assess a Spatial Strategy for Rural Development and Agriculture and a Spatial Strategy for Industry and Enterprise as follows.

2.3.1 Spatial Strategy for Rural Development & Agricultural Restructuring

Mayo has a very wide range of land use capability that will result in different parts of the County having very different futures under the onset of the reform of the Common Agricultural Policy. It is likely that areas with marginal agriculture – which comprise a very significant proportion of County Mayo - are likely to experience increasing levels of afforestation, alternative enterprises and rural settlement as a result. If these occur in an integrated and coordinated manner then there are likely to be benefits for all - in addition to increased protection for environmental assets such as groundwater, surface water quality, landscape

and cultural heritage. A Thematic Spatial Strategy for Agricultural Restructuring will address this need.

Integration into the Plan:

The measure for a Spatial Strategy for Rural Development & Agricultural Restructuring is identified under Section 3.16 - *Implementation* - of the Plan.

Agricultural Objective O/ED-A 1 mentions the Spatial Strategy however it is noted that details with regard to its content which are recommended in the Environmental Report are not identified

O/ED-A 1 It is an objective of the Council, having regard to future reforms under the Common Agricultural Policy, to support and facilitate the preparation of a Spatial Strategy for Rural Development and Agricultural Restructuring in conjunction with the County Development Board and its constituent bodies.

2.3.2 Spatial Strategy for Industry and Enterprise

Mayo is developing significant clusters of power, road, water and gas in parts of the east of the County. If properly co-ordinated these areas could be harnessed to become regionally significant zones to support and accommodate larger scale, value adding employment centres. A Spatial Strategy for Industry and Enterprise would identify these and reserve them for these uses while avoiding potential for future environmental and planning conflicts.

Integration into the Plan:

The measure for a Spatial Strategy for Industry and Enterprise is identified under Section 3.16 - *Implementation* - of the Plan; however, this measure is not integrated into a policy or objective.

2.4 Subsidiary Plans

Each LAP or framework plan within the County should contain adequate policy and guidance in order to highlight the importance of retaining the unique character and diversity of town and village centres, and provide for their protection.

Policies should be amended where necessary to take account of the carrying capacity of the environment – as outlined in this Report.

Consideration should be given in the drafting of residential policies to targeting the use of brownfield sites as a priority.

Residential objectives which promote the identification of opportunities for infill development and consolidation of existing towns and villages to reduce the need to zone additional greenfield lands should be included within LAPs subject to stringent design guidance and environmental protection.

The inclusion of a policy relating to the integration of the transport system throughout the LAP's could have a considerable positive effect.

The inclusion of a policy relating to the integrated provision of infrastructure within the LAP's, may help in lessening the potential environmental impact of infrastructural requirements to service lands within those LAP's, individually and cumulatively.

Integration into the Plan:

Section 2.2.8 of the Plan - *Zoning and Subsidiary Plans* - includes a number of policies and objectives which will contribute to the achievement of environmental sustainability through lower tier plans. Policy Number P/Z-1 in particular draws on a number of the recommendations made in the Environmental Report.

2.5 Mitigation Measures for Specific Environmental Topics

2.5.1 Designated Ecological Sites (MM1)

It is the policy of the Council to require that any planning application that proposes development within an area designated as a cSAC, SPA, NHA or pNHA listed in Appendix VI to be accompanied by an ecological impact assessment, assessing the impact of the proposal on these areas with conservation designations. The Ecological Impact Assessment will be forwarded to the National Parks &

Wildlife Section of the Department of Environment, Heritage and Local Government for their comments prior to the making of a decision by the Planning Authority.

2.5.2 Designated Wetland / Peatland Ecological Sites (MM2)

Planning applications where part or all of the subject site lies within a zone that extends from the boundary of any designated (or candidate) ecological site to the next field boundary or to a distance of 50 metres, whichever is closer, must be accompanied by an eco-hydrological assessment. This must comply with Section 18 of the European Communities (Natural Habitats) Regulations 1997 and identify and evaluate the direct and indirect effects which the development would be likely to have upon the designated site, ecological connectivity and drainage. Such planning applications must also be accompanied by evidence of consultation between the applicant and the National Parks and Wildlife Service about the assessment.

The need for eco-hydrological assessments for planning applications outside this zone shall be decided upon on a site by site basis depending on local ecological and drainage conditions and other factors as appropriate. In such cases the applicant should consult with Mayo County Council's Planning Department about the need for such an assessment.

2.5.3 Ecological Networks (MM3)

Planning applications must: identify all ecological corridors (including hedgerows and masonry stone walls), likely to be significantly affected, which are present on the relevant lands; identify any losses to these corridors which would result if the application in question was granted and; show that such losses would be fully offset if the application was to be granted through the replacement of the relevant corridors, with corridors composed of similar species or materials, before any losses to the existing corridors occur.

Where such opportunity exists between high value biodiversity areas applicants should be encouraged to enhance existing networks or create new networks between local biodiversity areas.

2.5.4 Water Quality Protection (MM4)

In order for permission to be granted to new developments, there must be sufficient capacity available to appropriately treat the waste water resulting from such developments. This may be done by: upgrading the capacity of the existing waste water treatment plant and agreeing a new Discharge License with the relevant organisation; sourcing capacity from other existing public waste water treatment plants, or by: constructing a new public waste water treatment plant.

Thus new development will be served by either:

- a. Providing new capacity for public waste water treatment either through the provision of a new public waste water treatment plant or through allocation of additional capacity to existing waste water treatment plants and extending the existing public waste water treatment catchment to serve all possible developments within the plan area

or:

- b. Treating waste water through the use of individual waste water treatment systems, such as septic tanks.

If development is served by b then the conditions outlined in the EPA's (2000) 'Wastewater Treatment Manuals Treatment Systems for Single Houses' shall be complied with, and:

- (i) Planning applications must demonstrate that wastewater resulting from the granting of the application will be treated so that any discharges to soil or water will work towards compliance with the following standards, subject to the EPA's (2000) Wastewater Treatment Manuals Treatment Systems for Single Houses: less than or equal to 30µg of phosphorous per litre of wastewater discharge, and; less than or equal to 100 faecal coliforms per 100ml of wastewater discharge.
- (ii) Applicants must submit a site suitability report alongside the planning application which outlines the likely effects on water quality which will be caused as a result of use of the relevant single waste water treatment system on site. This report shall

be carried out by a appropriately qualified person.

- (iii) The applicant, if successful with the relevant application, must submit a copy of an installation certificate to MCC stating that the treatment system was installed in line with the subject to the EPA's (2000) Wastewater Treatment Manuals Treatment Systems for Single Houses as well as a copy of a maintenance contract for a minimum of 10 years of maintenance, including desludging, for the waste water treatment system by appropriately certified person(s).

Note: If capacity in a public waste water treatment scheme is not made available to all development within the plan area in the long term then existing septic tanks, percolation areas and proprietary effluent systems may require to be upgraded in the long term in line with the conditions specified above and a monitoring system set up to the same effect. Objective O/EH-WQ 4 seeks to promote and support the introduction of a grant scheme for the upgrading of all pre-1980 septic tanks in the County.

2.5.5 Archaeological Heritage (MM5)

Planning applications within or adjacent to a buffer zone of 30m from a Site on the Sites & Monument Register must be accompanied by: an archaeological assessment detailing the impacts which the relevant development would have on archaeology in the area, including those impacts relating to the context of archaeology in the surrounding landscape.

2.5.6 Architectural Heritage (MM6)

Planning applications within towns identified as having a rich architectural heritage may be required to be accompanied by an assessment to be undertaken by a certified conservation architect detailing the impacts of the relevant development upon the special interest and character of the surrounding architectural heritage. The planning authority should be consulted at an early stage in this regard in order to determine whether there is a need for such an assessment.

2.5.7 Landscape Heritage (MM7)

Planning Applications that have the potential to impinge upon the integrity of significant landscape resources may be required to be accompanied by an assessment of the potential landscape and visual impacts of the proposed development – demonstrating that landscape impacts have been anticipated and avoided to a level consistent with the sensitivity of the landscape.

2.5.8 Coastal Protection (MM8)

A general minimum horizontal setback of 30m from the foreshore field boundary line for new development or along the 3m natural contour line, whichever is the greatest, is to be created. Any planning applications within this setback must demonstrate that any development would not be subject to potential rising sea levels as a result of global warming and must address any issues with regard to rising sea levels with regard to the siting of any development.

The coastal edge and coastal habitats shall be protected from destruction and degradation to ensure that their roles as ecological corridors, coastal flooding and storm surge buffers are retained and enhanced and request that developers proposing developments in the vicinity of this area be requested to carry out an ecological survey and submit an ecological plan that incorporates the natural vegetation and topography of the area

Integration into the Plan:

The above measures have been integrated into the adopted Plan as policies and/or objectives and/or development management guidelines. Some of the wording of the measures have been updated in order to reflect consultations with the NPWS e.g. MM1 and MM2, and updated guidance documents e.g. replacing the EPA 2000 Guidelines identified for MM4 with 'the revised Guidelines when approved or NSAI SR 6 1991'.

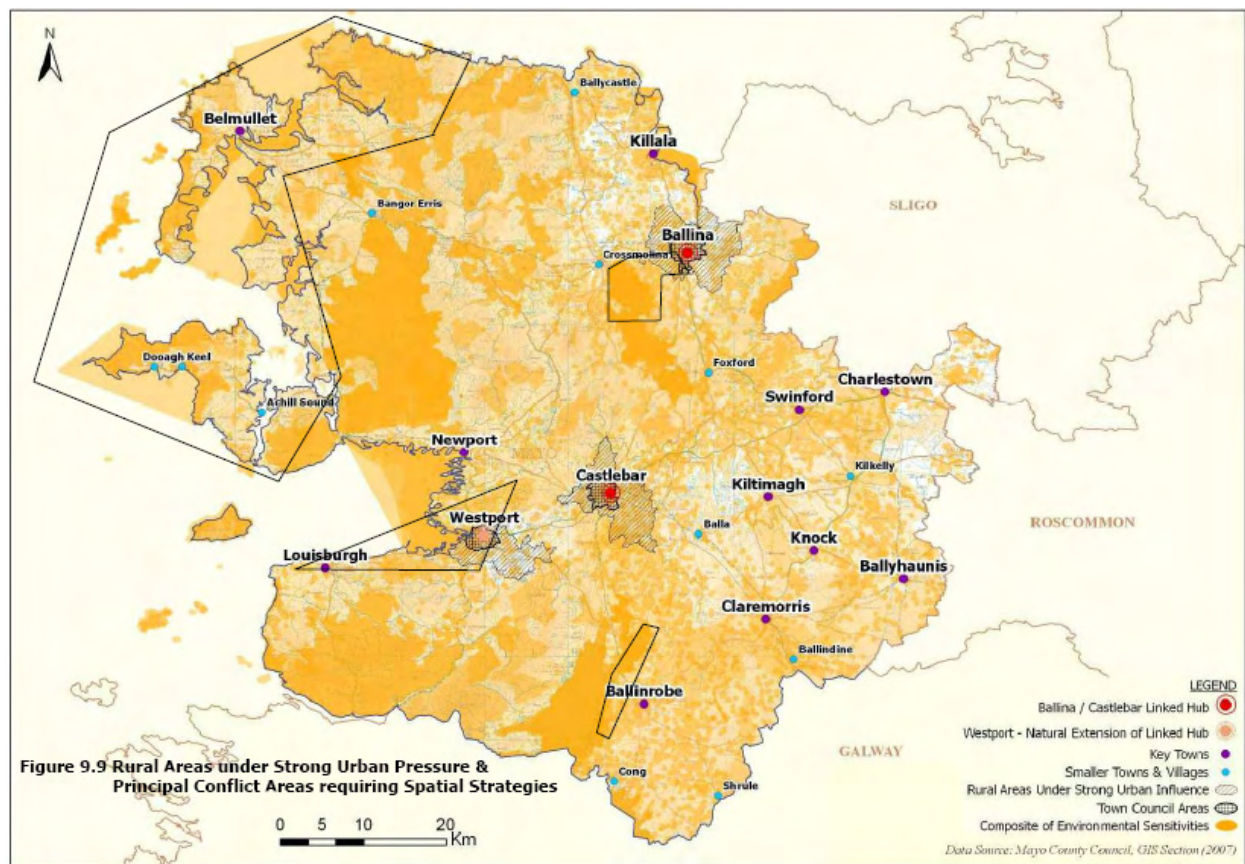


Figure 2.1 Principal Conflict Areas requiring Spatial Strategies

2.6 Environmental considerations which were integrated into the Draft Plan before it was put on display for the first time

2.6.1 Environmental Sensitivities

Significant environmental considerations were integrated into the Draft Plan before it was placed on public display for the first time.

Environmental constraints were mapped in order to identify which areas of the County would be most sensitive to development and would suffer the most adverse effects if growth was to be accommodated in those areas.

The constraints were communicated to the Plan-making team on a regular basis from the outset of the Plan preparation process. By identifying areas with the most limited carrying capacity in the County the making of recommendations to divert growth away from these areas was facilitated. The outputs of scoping consultations with the competent environmental authorities also informed the process.

Environmental sensitivities identified in County Mayo include, for example:

- The limited carrying capacity of surface water, especially in the east of the County;
- The extent of ecological designations, especially in the west of the County;
- The lack of appropriate waste water treatment at locations across the County; and,
- Archaeological Heritage.

Maps of the above sensitivities which were used to inform the Draft Plan-preparation process are shown on the following pages.

2.6.2 The Draft Plan and Amendments

A number of alternative scenarios were developed during the Draft Plan-preparation (see **Error! Reference source not found.**).

The most sustainable of these - balancing social and economic considerations with the environmental considerations identified as part of the SEA process - chosen for the basis of the Draft Plan which was placed on public display for the first time.

However, this Draft Plan was amended and subsequently adopted.

The adopted Plan does not have these environmental considerations which were identified as part of the Draft Plan preparation process integrated into it.

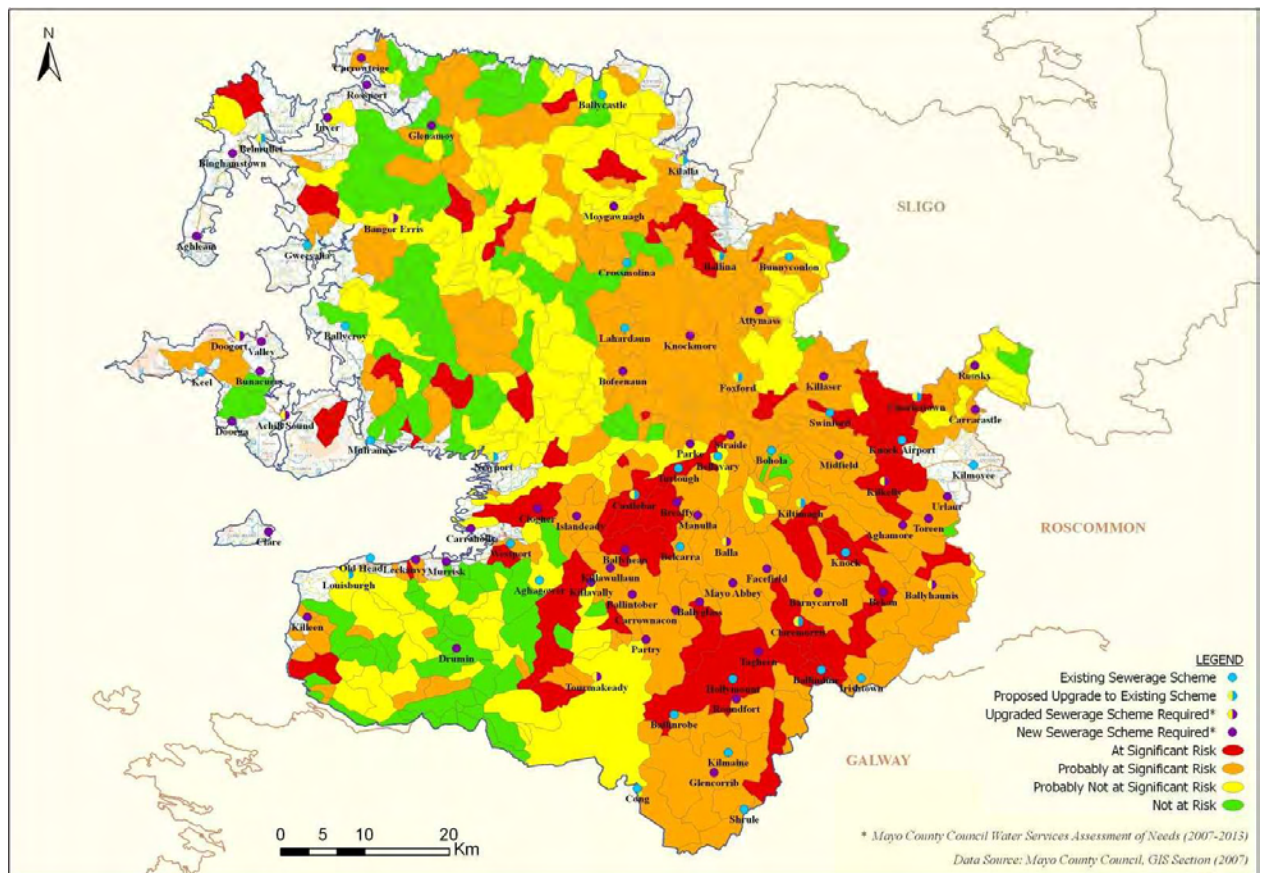


Figure 2.2 Surface Water Risk Assessment

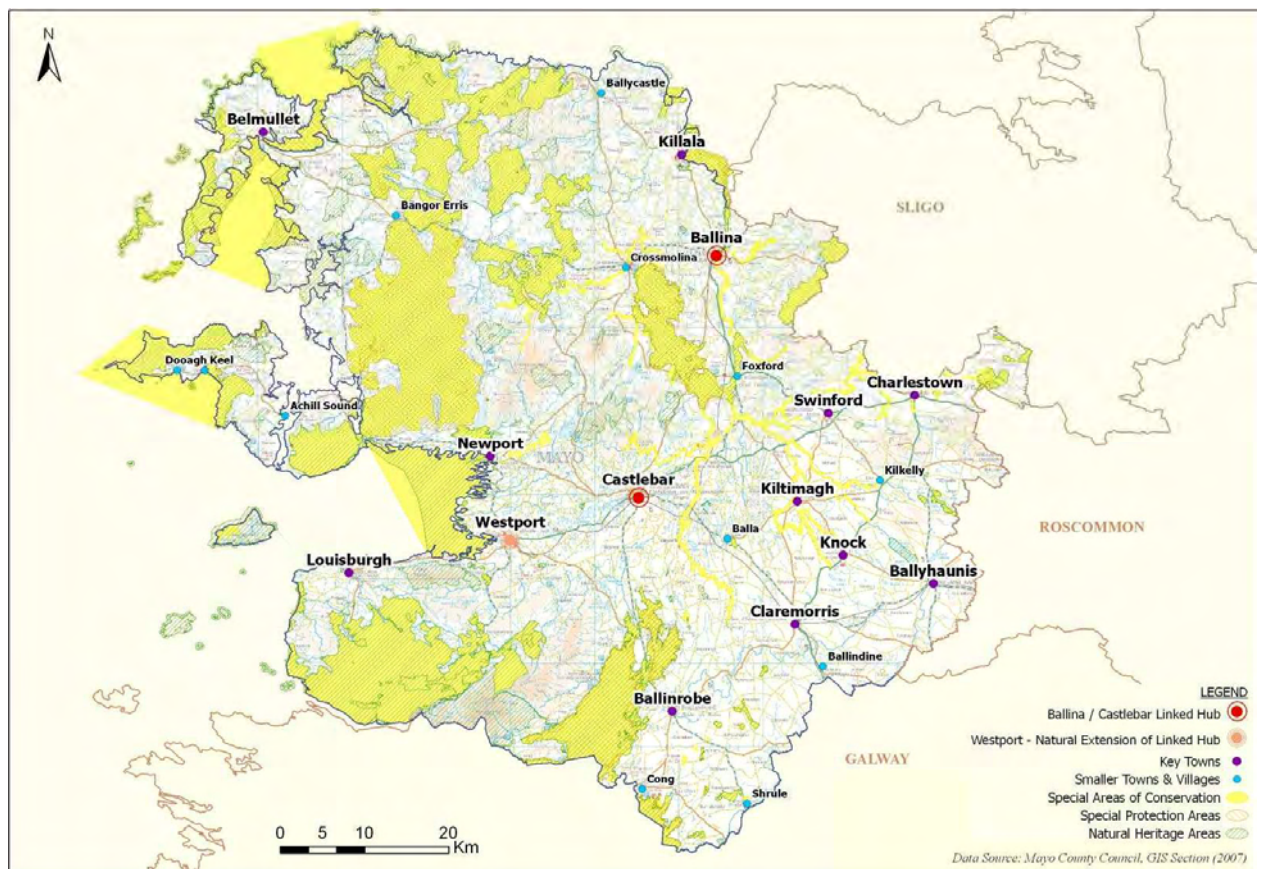


Figure 2.3 Ecological Designations

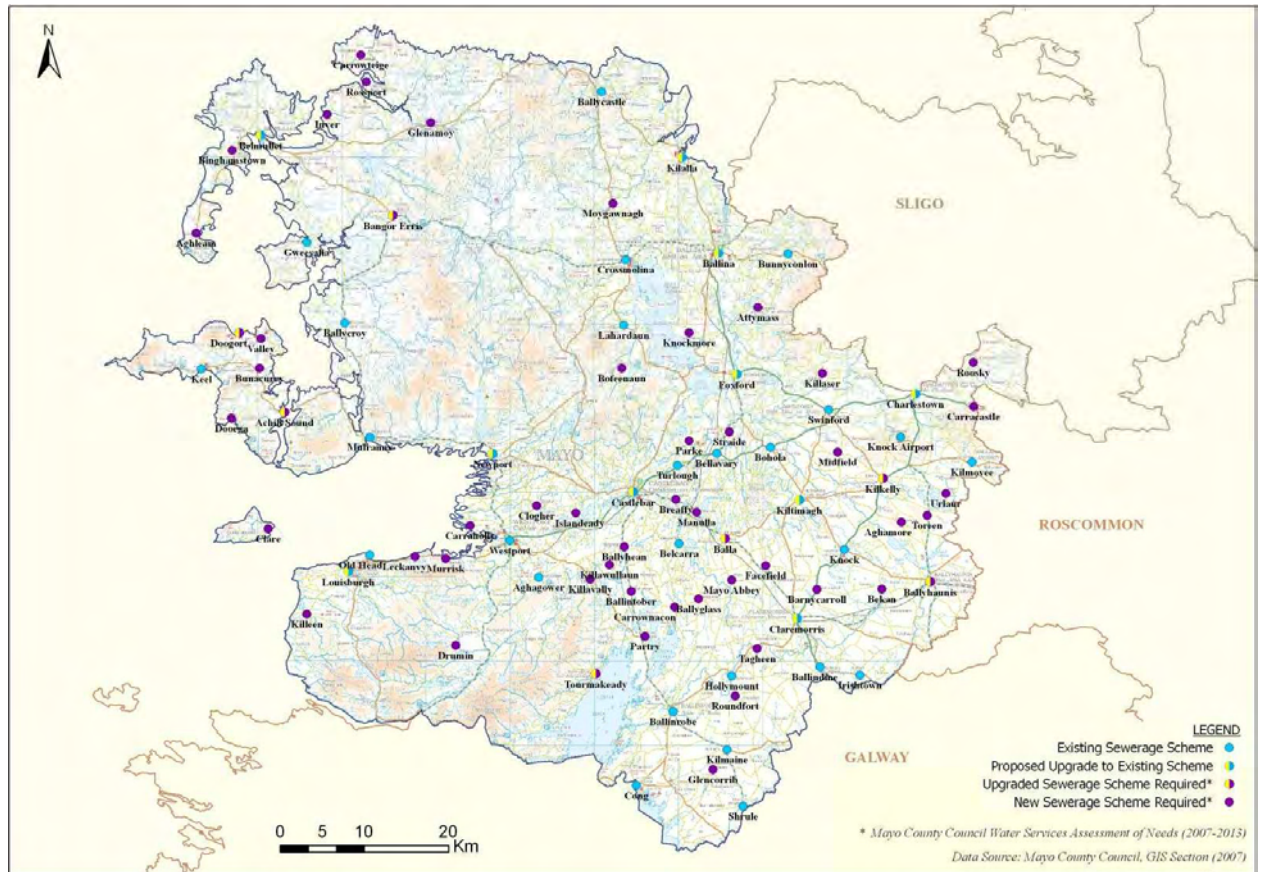


Figure 2.4 Waste Water Treatment Capacity

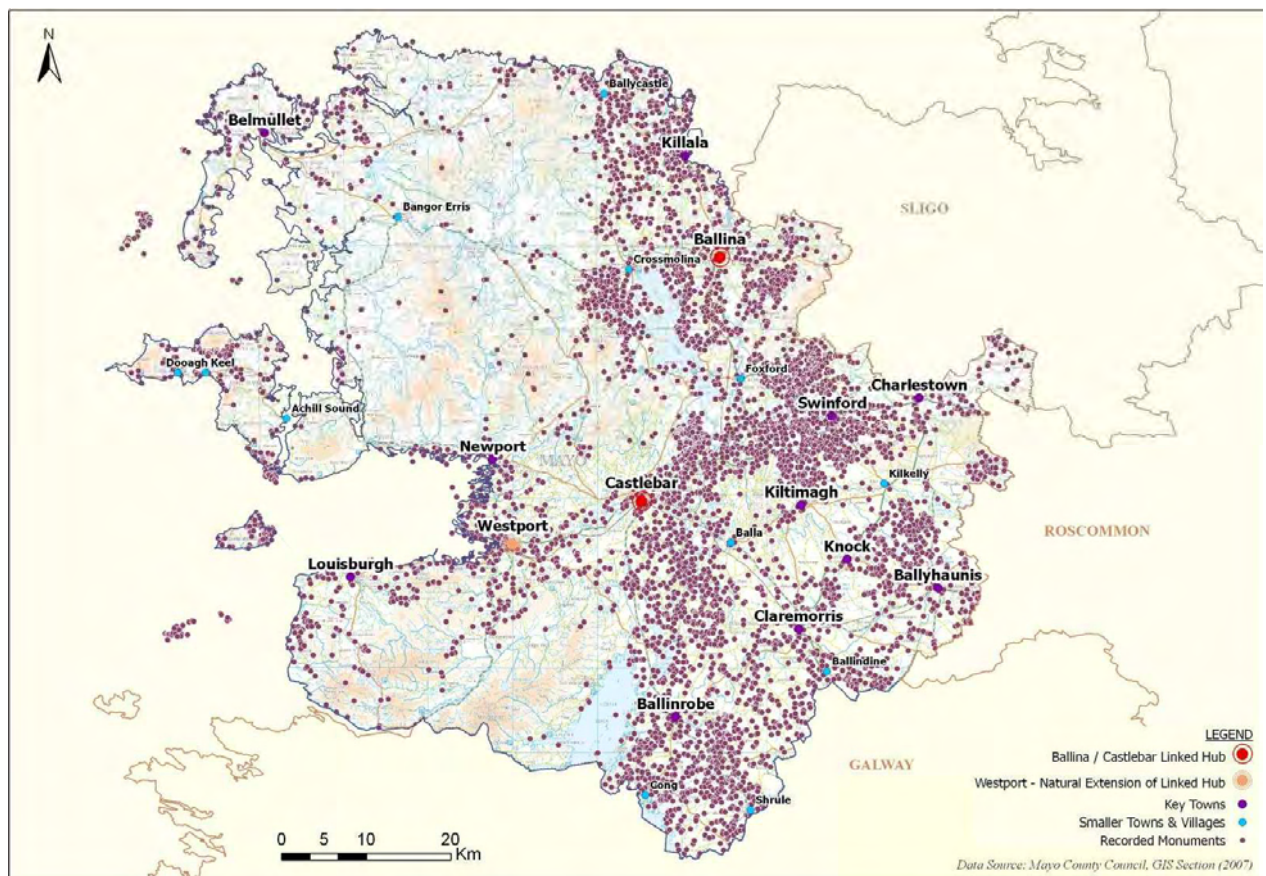


Figure 2.5 Archaeological Heritage

Section 3 Environmental Report and Submissions & Observations

3.1 Introduction

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

3.2 SEA Scoping Consultations

Strategic Environmental Assessment scoping letters were sent to the Department of the Environment, Heritage and Local Government (DEHLG), Department of Communications, Marine and Natural Resources (DCMNR) and Environmental Protection Agency (EPA).

The responses to these letters were taken into account during the carrying out of the Strategic Environmental Assessment. The Responses were as follows:

- Written response received from DEHLG covering the following topics:
 1. Information to be included re. nature conservation designations
 2. Information to be included re. sites that support rare or protected species
 3. Information to be included on important bird sites
 4. Information to be included on sensitive waters
 5. Information to be included habitat types
 6. Data sources
 7. Ecological assessments
 8. Non-designated sites
- The EPA offered guidance regarding SEA methodology, data sources and likely issues in Mayo. This guidance was available on an ongoing basis throughout the Plan preparation process.
- No response received from DCMNR.

3.3 Submissions and Observations

Submissions and observations made after public display periods were responded to by CAAS recommending that the Environmental Report be altered where appropriate. Any changes to the Environmental Report as a result of submissions or observations are detailed under Section 6 as they were detailed in the relevant Addenda.

3.4 Environmental Report

3.4.1 General Description

The findings of SEA were expressed in an Environmental Report which was submitted to the Elected Members alongside the Draft Plan. The purpose of the report was to provide a clear understanding of the likely environmental consequences of decisions regarding the future accommodation of growth in County Mayo.

Amendments made to the Draft Plan at each stage of the process were evaluated for their environmental consequences and these were presented to the Elected Members in the form of Addenda. On adoption of the Draft Plan, these Addenda were used to update the original Environmental Report into a final Environmental Report which accompanies the adopted Plan.

These amendments included alterations of, additions to and removal of Draft Plan provisions.

At each stage of the process the Elected Members were required by the legislation to take into account the Environmental Report - including the Addenda - before the adoption of the plan or programme.

3.4.2 Changes to Rural Area Types

The following text is taken from Addendum II on the SEA and relates to a proposed amendment on Rural Area Types contained in the Draft Plan.

Addendum II identified the environmental consequences of this amendment with reference to the environmental effects of alternative scenarios detailed in the Environmental Report.

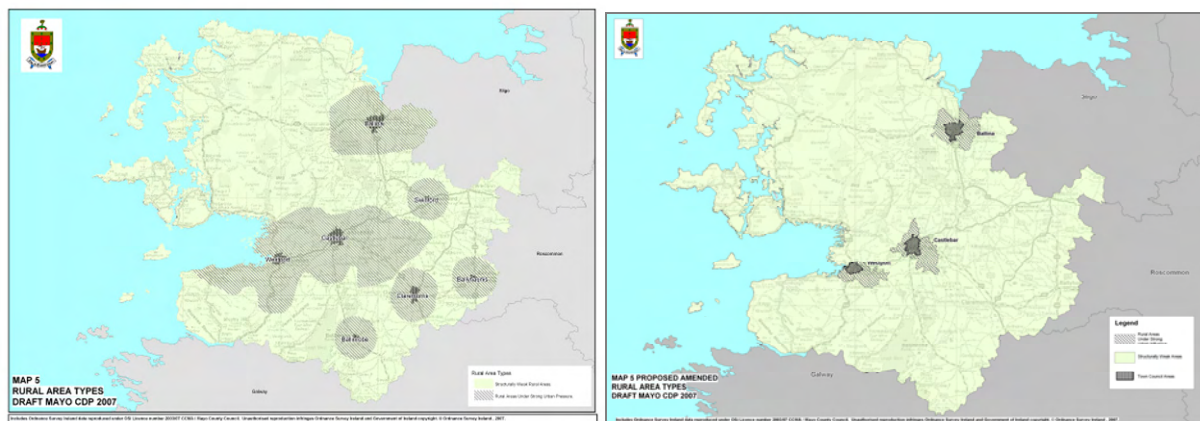
The Elected Members made an informed decision when adopting the proposed amendment of the Draft Plan as part of the Plan.

Note: Significant Updating of Environmental Report as a result of proposed changes to the Rural Area Policies

As part of the Proposed Amendments to the Draft Plan it is proposed to significantly reduce the size of the *Rural Areas Under Strong Urban Pressure*. It is also proposed to rename these areas *Rural Areas Under Strong Urban Influence*.

Map A below shows the old *Rural Areas Under Strong Urban Pressure* [shaded light grey] while Map B shows the proposed *Rural Areas Under Strong Urban Influence* [also shaded light grey].

On implementation of the plan, urban generated housing in these areas would be controlled by policies within the Plan. These controls would have beneficial effects with regard to the protection of the environment in these areas.



Map A [left] old *Rural Areas Under Strong Urban Pressure* [shaded light grey] **Map B** [right] proposed *Rural Areas Under Strong Urban Influence* [also shaded light grey].

As the proposed amendment to the rural area types (Map B) would reduce the size of the areas in which urban generated housing is controlled, it would be likely to have significant adverse effects on the protection of the County's environment.

If the proposed amendment is made, the Environmental Report would be required to be updated in order to reflect which of the four Alternative Plan Scenarios bears the closest resemblance to the Draft Plan.

With Map A- detailed in the Environmental Report included in the Draft Plan, Alternative Scenario 4 *Strong Planning B- Inclusive* is closest to the Draft Plan.

[The likely environmental effects of this scenario were detailed in the Addendum as they are in Section 4 of this report]

If the Draft Plan is amended by the replacement of Map A with Map B, then Alternative Scenario 1 *Weak Planning* would be closest to the Draft Plan.

[The likely environmental effects of this scenario were detailed in the Addendum as they are in Section 4 of this report]

Figure 6 Text taken from Addendum II on the SEA and relates to a proposed amendment on Rural Area Types contained in the Draft Plan.

Section 4 Alternatives and the Plan

4.1 Introduction

This Section details the alternatives which were identified and evaluated for likely environmental and planning effects as part of the SEA process for the Mayo County Development Plan.

The Members were of the opinion that the alternatives proposed by the officials did not meet these needs and sought, and made, an alternative Plan.

4.2 Adoption of an Alternative Plan

In the course of the development of the plan four strategic alternative plan scenarios were formally evaluated to determine their Planning and Environmental consequences.

Alternative Scenario considered were:-

- Scenario 1 *Weak Planning*
- Scenario 2 *Mixed Planning*
- Scenario 3 *Strong Planning A – Prescriptive*
- Scenario 4 *Strong Planning B – Inclusive*

The contents of these scenarios – together with descriptions of their likely planning and environmental consequences – are set out below.

As a result of these considerations Scenario 4 (*Strong Planning B – Inclusive*) formed the basis of the Draft County Development Plan which was placed on public display for the first time.

However, this Draft Plan was amended and a revised Plan was subsequently adopted. The adopted Plan is a mix of Scenario 1 *Weak Planning* and Scenario 2 *Mixed Planning*.

In adopting this alternative Plan the Elected members had regard to the contents of the Environmental report and its amendments. However in doing so they cited:-

- the need to attract and sustain population and associated economic activity in peripheral rural areas as the principal reason for the revised Plan policy.
- continuing population decline in these areas as undermining the social fabric necessary to maintain cultural continuity.
- overwhelming social and economic considerations that justified equal consideration with environmental considerations – pointing out that the existing and much designated environment of May is the result of human management in the first instance.

4.3 Scenario 1 – *Weak Planning*

4.3.1 Description

Extensive areas of weakly controlled development in rural areas – especially along lake and sea coasts and as ribbons between major towns.

Residual areas of natural habitat in the west of the county adjoining very large areas of natural resource enterprises such as forestry, wind energy and mineral extraction interspersed with large areas of rural housing.

The south-east of the County contains the majority of the settlement, infrastructure and enterprise.

Settlement is highly dispersed; villages and towns continue to weaken.

4.3.2 Planning Impacts

This approach does not appear to be set within a plan led or strategy vision for the future. Likely outcome of this approach would result in:

- Ad hoc dispersed rural housing is likely to draw population away from the towns

/villages. This will result in the inability of the town/villages to grow and develop and build up the necessary population base that would generate viable service provision and economic opportunities. The likely outcome is the loss of services & facilities in these towns which in turn would have serious implications for the quality of life for the rural communities.

- Concentration of urban generated housing around the main centres as has been happening is likely with consequences for the orderly and efficient development of newly developing areas on the edges of these towns, obstruction of alignments for future provision of infrastructure, undermining viability of urban public transport and attendant later problems in terms of demands for higher public expenditure.
- Consequences and concerns relating to for the sustainable development of key assets such as wind energy, road network, aggregates etc.
- Potential adverse effects on water quality and environmentally sensitive areas, scenic amenities and natural and made heritage resources the sustainable management and development of which do not appear to be taken into consideration in this approach.
- This scenario does not converge with the NSS framework for Mayo.

4.3.3 Environmental Impacts

Surface Water

The bulk of development takes place within the catchments of rivers and streams that are at significant risk and are not connected with waste water treatment plants which will cause significant deterioration in the quality of surface waters. There will be significant non-conformances with the provisions of the water Framework Directive

Groundwater

The levels of ad hoc dispersed rural housing will create significant pollution to groundwater throughout the south-eastern portion of the county. There will be significant non-conformances with the provisions of the water Framework Directive

Ecology

There will be significant loss of the quantity, quality and continuity of upland, coastal, lake, river and peatland habitats. There will be significant breaches of the provisions of the habitats Directive

Cultural Heritage

Likely development pressure areas strongly coincide with concentrations of archaeology and monuments in Mayo - emphasising the richness of Mayo's heritage and the need to put in place systematic ways of anticipating and avoiding potential archaeological impacts during the development stage.

Landscape

There will be significant and widespread deterioration of the character and integrity of the coastal, upland, lake and wilderness landscapes of County Mayo – with associated impacts on tourism amenities. There will be significant and numerous non-conformities with the provisions of the CDP Landscape Protection Policies

4.4 Scenario 2 - *Mixed Planning*

4.4.1 Description

Some areas of weakly controlled development in rural areas – especially along lake and sea coasts with reasonable containment of development outside major towns.

Large areas of natural habitat remain in the west of the county interspersed with recreation and tourism enterprises adjoining extensive areas of natural resource enterprises such as forestry, wind energy and mineral extraction.

The south-east of the County contains the majority of the settlement, infrastructure and enterprise.

Settlement is highly dispersed; villages and towns remain weak – except in tourism areas where they have poor social cohesion.

4.4.2 Planning Impacts

Some elements of this approach are moving towards a more strategic vision of how development should take place in the County. These are the containment of development outside major towns and the location of

recreation and tourism enterprises in/near areas of natural habitats. However;-

- The dispersed settlement patterns in the south-east combined with the growth of the main urban centres, at the expense of the smaller towns and villages has consequences similar to that posed in comments for Scenario 1 and would result in imbalanced economic development of the County.
- This scenario does not converge with the NSS framework for Mayo.

4.4.3 Environmental Impacts

Surface Water

The bulk of development takes place within the catchments of rivers and streams that are at significant risk and are not connected with waste water treatment plants which will cause significant deterioration in the quality of surface waters. There will be significant non-conformances with the provisions of the water Framework Directive

Groundwater

The levels of ad hoc dispersed rural housing will create significant pollution to groundwater throughout the south-eastern portion of the county. There will be significant non-conformances with the provisions of the water Framework Directive

Ecology

With the exception of areas beside lakes, coasts and salmonid waters – there is a relatively low potential for development and settlement to conflict with nature in most of Mayo. However, developments in the highlands and coastal areas have to be very carefully prepared and scrutinised in order to anticipate and avoid impacts on these resources.

Cultural Heritage

Likely development pressure areas strongly coincide with concentrations of archaeology and monument sin Mayo - emphasizing the richness of Mayo's heritage and the need to put in place systematic ways of anticipating and avoiding potential archaeological impacts during the development stage.

Landscape

There will be significant localized deterioration of the character and integrity of the coastal,

upland, lake and wilderness landscapes of County mayo – with associated impacts on tourism amenities. There will be significant localized non-conformities with the provisions of the CDP Landscape Protection Policies

4.5 Scenario 3 - Strong Planning A - *Prescriptive*

4.5.1 Description

An extensive planned settlement corridor develops which supports the majority of the County's population and their associated employment, services and infrastructure in a high quality environment.

The majority of the County is managed and planned as natural amenities subject to strict interpretation of EU Directives. The east of the County contains designated areas for natural resource enterprises such as forestry, wind energy and mineral extraction.

The south-east of the County supports rural enterprises – based on agri-business, and service functions set in a matrix of strengthening villages and towns as well as some rural settlement in planned areas.

4.5.2 Planning Impacts

This scenario devises a more strategic role for the towns and villages. However, it does not appear to acknowledge the hierarchical settlement structure for the towns as envisaged in the NSS i.e. Ballina-Castlebar linked hub and the complimentary role of smaller towns and villages.

The management of the majority of the County as natural amenities would have implications for existing rural communities as it implies that such areas would largely be associated with amenity rather than other economic activities which could be carried out in a sustainable manner without impacting on the inherent conservation value of such areas.

Rural areas with strong potential for diversification and diversifying areas (NSS) would be unlikely to develop as envisaged in the NSS concept under this Scenario as these areas have a largely passive role under this Scenario.

4.5.3 Environmental Impacts

Surface Water

Almost all of the main urban centres are located within the catchments of rivers and streams that are at significant risk. Virtually all of the associated pressure in adjacent rural areas also occurs in such areas. This means that developments within these areas that are not connected with adequately sized and effectively operated waste water treatment plants will almost certainly cause significant deterioration in the quality of surface waters. This is a significant risk that must be mitigated against by the timely development of appropriate waste water treatment facilities.

Groundwater

The soils and geology of County Mayo create conditions which mean that there are probably significant risks of pollution to groundwater throughout the south-eastern portion of the county. This means rural developments in the environs of Ballinrobe, Claremorris and Ballyhaunis will to be very carefully prepared and scrutinised in order to anticipate and avoid impacts.

Ecology

With the exception of areas beside lakes, coasts and salmonid waters – there is a relatively low potential for development and settlement to conflict with nature in most of Mayo – except for localized impacts associated with extraction and energy projects in the east. However, developments in the highlands and coastal areas have to be very carefully prepared and scrutinised in order to anticipate and avoid impacts on these resources.

Cultural Heritage

Likely development pressure areas strongly coincide with concentrations of archaeology and monument in Mayo - emphasising the richness of Mayo's heritage and the need to put in place systematic ways of anticipating and avoiding potential archaeological impacts during the development stage.

Landscape

The majority of the County's valued upland, coastal and natural landscapes [Policy Areas 1,2,3] will remain largely unchanged – except for localized impacts associated with extraction and energy projects in the east.. The east of the county – which is a predominantly robust type – will continue to exhibit the dynamism and

change of an inhabited working landscape. The coastal landscapes of the north-west will continue to exhibit dynamism and change – albeit in a more environmentally sensitive manner than in recent years.

4.6 Scenario 4 - Strong Planning B - *Inclusive*

4.6.1 Description

An extensive planned settlement corridor develops which supports the majority of the County's population and their associated employment, services and infrastructure in a network of high quality settlements.

Very extensive areas of natural habitat remain throughout the County which also sustain recreation and tourism enterprises as well as environmental services in rural areas and strong towns and villages where quality of life is the priority. A separate and distinctive coastal complex sustains a mixture of marine enterprises, tourism, settlement, culture and service facilities in an overwhelmingly natural context.

The south-east of the County contains an integrated and thriving series of rural enterprises – based on alternative energy production, mineral extraction, agri-business, and service functions set in a matrix of strong villages and towns as well as rural settlement in planned areas.

A Mixed settlement strategy offers the full spectrum of planned choices – in all types of urban and rural environments.

4.6.2 Planning Impacts

This scenario has regard to the strategic potential of different parts of the County and the development of this potential in a sustainable manner. It acknowledges the role of existing settlements and also rural settlement. Of the four scenarios presented, it would appear to fit best with the NSS concept

4.6.3 Environmental Impacts

Surface Water

Almost all of the main urban centres are located within the catchments of rivers and streams that

are at significant risk. Virtually all of the associated pressure in adjacent rural areas also occurs in such areas. This means that developments within these areas that are not connected with adequately sized and effectively operated waste water treatment plants will almost certainly cause significant deterioration in the quality of surface waters. This is a significant risk that must be mitigated against by the timely development of appropriate waste water treatment facilities.

Groundwater

The soils and geology of County Mayo create conditions which mean that there are probably significant risks of pollution to groundwater throughout the south-eastern portion of the county. This means rural developments in the environs of Ballinrobe, Claremorris and Ballyhaunis will to be very carefully prepared and scrutinised in order to anticipate and avoid impacts.

Ecology

With the exception of areas beside lakes, coasts and salmonid waters – there is a relatively low potential for development and settlement to conflict with nature in most of Mayo. However, developments in the highlands and coastal areas have to be very carefully prepared and scrutinised in order to anticipate and avoid impacts on these resources.

Cultural Heritage

Likely development pressure areas strongly coincide with concentrations of archaeology and monuments in Mayo - emphasizing the richness of Mayo's heritage and the need to put in place systematic ways of anticipating and avoiding potential archaeological impacts during the development stage.

Landscape

The majority of the County's valued upland, coastal and natural landscapes (Policy Areas 1, 2, 3) will remain largely unchanged. The east of the county – which is a predominantly robust type – will continue to exhibit the dynamism and change of an inhabited working landscape. The coastal landscapes of the north-west will continue to exhibit dynamism and change – albeit in a more environmentally sensitive manner than in recent years.

Section 5 Monitoring

5.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This SEA Statement identifies the proposals for monitoring the County Development Plan (CDP) which were adopted alongside the CDP.

Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action. In addition to this, monitoring can also play an important role in assessing whether the CDP is achieving its environmental objectives and targets - measures which the CDP can help work towards - whether these need to be reexamined and whether the proposed mitigation measures are being implemented.

5.2 Indicators and Targets

Monitoring is based around the indicators which were chosen earlier in the process. These indicators allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives used in the evaluation. Focus will be given to indicators which are relevant to the likely significant environmental effects of implementing the CDP and existing monitoring arrangements will be used in order to monitor the selected indicators. Each indicator to be monitored is accompanied targets which are derived from the relevant legislation (see **Error! Reference source not found.**).

Table 5.1 below shows the indicator and targets which have been selected with regard to the monitoring of the plan.

5.3 Sources

Measurements for indicators should come from existing monitoring sources and no new monitoring should be required to take place. Existing monitoring sources exist for each of the indicators and include those maintained by Mayo County Council and the relevant authorities e.g. the Environmental Protection Agency, the National Parks and Wildlife Service and the Central Statistics Office.

The *Development Management Process* in Mayo County Council will provide passive monitoring of various indicators and targets on an application by application basis. Where significant adverse effects are likely to occur upon, for example, entries to the RMP, entries to the RPS or ecological networks as a result of the undertaking of individual projects or multiple individual projects such instances should be identified and recorded and should feed into the monitoring evaluation.

5.4 Reporting

A preliminary monitoring evaluation report on the effects of implementing the CDP will be prepared to coincide with the Manager's report to the elected members on the progress achieved in securing CDP objectives within two years of the making of the plan (this Manager's report is required under section 15 of the 2000 Planning Act).

5.5 Responsibility

Mayo County Council are responsible for collating existing relevant monitored data, the preparation of a monitoring report, the publication of this report and, if necessary, the carrying out of corrective action.

Environmental Component	Selected Indicator(s)	Selected Target(s)
Biodiversity, Flora and Fauna	<p>B1: Percentage of relevant habitat or species lost in designated ecological sites</p> <p>B2: Number of significant adverse impacts, including direct, cumulative and indirect impacts, to relevant habitats and species in designated ecological sites by development within or adjacent to these sites</p> <p>B3: Percentage of ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity.</p>	<p>B1: No losses of relevant habitat. Species or their sustaining resources in designated ecological sites during the lifespan of the CDP</p> <p>B2: No significant adverse impacts, including direct, cumulative and indirect impacts, to relevant habitats, species or their sustaining resources in designated ecological sites by development within or adjacent to these sites</p> <p>B3: No ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity to be lost without remediation</p>
Population and Human Health	HH1: Occurrence [any] of a spatially concentrated deterioration in human health	HH1: No spatial concentrations of health problems arising from environmental factors.
Soil	<p>S1: Area of brownfield land available</p> <p>S2: Proportion of excavated area returned to productive use.</p>	<p>S1: No brownfield land to be available (subject to availability on the open market and demand for such land) at the end of the CDP lifespan</p> <p>S2: All extraction sites to have progressive rehabilitation programmes in place with agreed rehabilitation targets</p>
Water	<p>W1: Biotic Quality Rating (Q Value)</p> <p>W2: Trophic Status</p> <p>W3: Faecal Coliform Counts per 100ml of groundwater</p>	<p>W1i: To maintain a biotic quality rating of Q4, in line with the requirement to achieve good water status under the Water Framework Directive, by 2015</p> <p>W1ii: To improve biotic quality ratings, where possible, to Q5 Indicator W2: Trophic Status</p> <p>W2i: To maintain a trophic status of mesotrophic, in line with the requirement to achieve good water status under the Water Framework Directive, by 2015</p> <p>W2ii: To improve trophic status, where possible, to oligotrophic</p> <p>W3: 0 Faecal Coliform Counts per 100ml of groundwater</p>

Environmental Component	Selected Indicator(s)	Selected Target(s)
Water continued	<p>W4: Trophic Status (ATSEBI)</p> <p>W5a: Total Coliform Counts per 100ml of bathing water</p> <p>W5b: Faecal Coliform Counts per 100ml of bathing water</p>	<p>W4: To maintain or to improve trophic status, where relevant, to unpolluted in line with the requirement to achieve good water status under the Water Framework Directive, by 2015</p> <p>W5a: $\leq 5,000$ Total Coliform Counts per 100ml of bathing water</p> <p>W5b: $\leq 1,000$ Faecal Coliform Counts per 100ml of bathing water</p>
Air & Climatic Factors	<p>C1i: Percentage of population within the Plan area travelling to work or school by public transport or non-mechanical means.</p> <p>Indicator C1ii: Average distance travelled to work or school by the population of County Mayo</p>	<p>Target C1i: An increase in the percentage of the population travelling to work or school by public transport or non-mechanical means</p> <p>Target C1ii: A decrease in the distance travelled to work or school by the population of County Mayo</p>
Material Assets	M1: Number of new developments granted permission which cannot be adequately served by a public waste water treatment plant over the lifetime of the CDP	M1: No new developments granted permission which cannot be adequately served by a public waste water treatment plant over the lifetime of the CDP
Cultural Heritage	<p>CH1: Number of unauthorised developments permitted over the lifespan of the CDP which result in full or partial loss of: archaeology listed on the Record of Monuments and Places; areas identified as being of archaeological potential and significance; sites identified as being major sites of archaeological importance, and; the context of the above within the surrounding landscape where relevant.</p> <p>CH2: Number of unauthorised developments permitted over the lifespan of the CDP which result in physical loss or loss to the context in the surrounding landscape or streetscape of RPSs</p>	<p>CH1: No unauthorised developments permitted over the lifespan of the CDP which result in full or partial loss of: archaeology listed on the Record of Monuments and Places; areas identified as being of archaeological potential and significance; sites identified as being major sites of archaeological importance, and; the context of the above within the surrounding landscape where relevant.</p> <p>CH2: No unauthorised developments permitted over the lifespan of the CDP which result in physical loss or loss to the context in the surrounding landscape or streetscape of RPSs</p>
Landscape	<p>L1i: Number of unauthorised conspicuous developments located within sensitive landscapes</p> <p>L1ii: No unauthorised developments to be conspicuously located within sensitive landscapes</p>	<p>L1i: Number of unauthorised conspicuous developments adversely impacting upon vulnerable landscape features</p> <p>L1i: No unauthorised developments to adversely impact upon vulnerable landscape features</p>

Table 5.1 Selected Indicators and Targets

Section 6 Updating of the Environmental Report arising out of submissions

6.1 Introduction

Submissions and observations made after public display periods were responded to by CAAS recommending that the Environmental Report be altered where appropriate. Any changes to the Environmental Report as a result of submissions or observations are detailed below as they were detailed in the relevant Addenda.

6.2 Submission by Department of the Environment, Heritage and Local Government (DEHLG) on the Environmental Report

DEHLG (ER) Point 2

Section 4.2.2.2: SPAs and SACs should be listed in separate sections. At present, SACs in Ireland are candidate SACs and are fully legally protected.

- **Response:**

The listing of SPAs and SACs in separate sections is not necessary and would make no difference with regard to the findings of the SEA. It is noted that at present, SACs in Ireland are candidate SACs and are fully legally protected.

- **Updating of Environmental Report:**

To replace 'SACs' with 'candidate SACs'.

DEHLG (ER) Point 3

Section 4.2.2.3: in addition to designated and legally protected NHAs, proposed NHAs should also be listed.

- **Response:**

There is no listing of designated and legally protected NHAs in Section 4.2.2.3. Section 3.2.4 gives the numbers of NHAs and of pNHAs in the County. Appendix I provides site synopses for the NHAs and these are included on Figure 3.1 too.

• **Updating of Environmental Report:**

To include the following list of all NHAs (i.e. pNHAs and NHAs)

Site Code	Site Name
459	Altaconey Bog
1470	Ardgommon Wood
1970	Ballybeg Island
1473	Bangor Erris Bog
467	Benaderreen Cliffs
469	Bills rocks
1278	Burren Rock
1969	Caher Island
1492	Carrowmore Lough Shore
477	Clare Island
1483	Cloghmoyle Dunes
1485	Cloonagh Lough
1486	Cloonboorhy Lough
481	Coolbarreen Lough
1488	Cooraun Point Machair/Dooreel Creek
482	Creevagh Head
483	Croagh Patrick
2383	Croaghmoyle Mountain
2420	Cunnagher More Bog
1491	Dambaduff Lough
2381	Doogort East Bog
494	Downpatrick Head
1499	Drumleen Lough
1500	Eagle Island
2446	Ederglen Bog
2432	Forrew Bog
1504	Frehill Island
2419	Glenturk More Bog
502	Gowlaun Bog
2391	Inagh Bog
1971	Inishdalla
1511	Inishdegil Islands
1967	Inishgalloon
506	Inishglora and Inishkeeragh
509	Inishturk
510	Kilgarraiff Bog
1517	Killala Esker
511	Killaturly Turlough
1518	Kinlooey Lough
512	Kinrovar Machair
1520	Knappagh Woods
1527	Lough Alick
1528	Lough Beg, Carrowmore

519	Lough Conn and Lough Cullin
523	Lough Gower
2455	Lough Greney Bog
1533	Lough Manan
1910	Mannin and Island Lakes
735	Maumtrasna Mountain Complex
1472	Mountpleasant School Turlough
2078	Moy Valley
1968	Mweelaun Island
1548	Pollatomish Bog
215	Rathbaun Turlough
385	Rostaff Turlough
1559	Slishmeen Turlough
2403	Sraheens Bog
546	Stags of Broadhaven
548	Tawnymackan Bog
550	Towerhill Lake
1566	Tristia Bog
1567	Tullaghan Bay
1570	Tullaghan Bay and Bog
1570	Ummeramtarry Bog

DEHLG (ER) Point 4

- a) *Section 9.5: mitigation measures MM1 and MM2 require revision and input from an expert to clarify their scope and application in relation to protected sites and species.*
- b) *In MM1, the role and implications of the 30m buffer zone are unclear*
- c) *In MM2, the assessment should be an appropriate assessment in the case of cSACs and SPAs, and this is likely to require ecological surveys and possibly hydro(geo)logical surveys*
- d) *MM2 appears not to apply to developments in sites with nature conservation designations. It requires revision to include developments (including plans and projects) inside sites and within 30m of these sites*
- e) *MM2: in the case of possible planning applications in or adjacent to designated sites, it is the role of NPWS to advise in relation to nature conservation designations, their implications and other wildlife issues that may exist or arise, or about the scope of any assessments required if developments are proposed. It is considered inappropriate for NPWS to be required to review and essentially sign off on the findings of an assessment prior to the submission of a planning application. This mitigation measure requires revision.*

- **Response:**

This is noted.

- **Updating of Environmental Report:**

To update Mitigation Measure 1 (MM1) as follows:

It is the policy of the Council to require that any planning application that proposes development within an area designated as a cSAC, SPA, NHA or pNHA listed in Appendix VI to be accompanied by an ecological impact assessment, assessing the impact of the proposal on these areas with conservation designations. The Ecological Impact Assessment will be forwarded to the National Parks & Wildlife Section of the Department of Environment, Heritage & Local Government for their comments prior to the making of a decision by the Planning Authority.

To update Mitigation Measure 2 (MM2) as follows:

Planning applications where part or all of the subject site lies within a zone that extends from the boundary of any designated (or candidate) ecological site to the next field boundary or to a distance of 50 metres, whichever is closer, must be accompanied by an eco-hydrological assessment. This must comply with Section 18 of the European Communities (Natural Habitats) Regulations 1997 and identify and evaluate the direct and indirect effects which the development would be likely to have upon the designated site, ecological connectivity and drainage. Such planning applications must also be accompanied by evidence of consultation between the applicant and the National Parks and Wildlife Service about the assessment.

The need for eco-hydrological assessments for planning applications outside this zone shall be decided upon on a site by site basis depending on local ecological and drainage conditions and other factors as appropriate. In such cases the applicant should consult with Mayo County Council's Planning Department about the need for such an assessment.

6.3 Submission by M. Brennan

M. Brennan Point 1

I would draw your attention to page 17 of the Non-Technical Summary of Environmental Report on the Strategic Environmental Assessment of the Draft Mayo County Development Plan, Figure 3.4 Registered Quarries. This map is inaccurate as it includes quarries that applied for registration, but were found to be 'unauthorised developments', and did not achieve registration. This map also includes 'quarry areas' that

applied for registration, and not the 'quarry areas' which were granted registration. Specifically the three quarries in the Neale area. This map needs to be redrawn.

- **Response:**

This map intends to communicate the general spatial distribution of quarrying activities in the County. It is acknowledged that there are a number of discrepancies between the title of the map and the information displayed.

- **Updating of Environmental Report:**

To update this map in the environmental report on adoption of the Draft CDP on receipt of revised data from Mayo County Council.

6.4 Submission by Gerard McGarry

Gerard McGarry Point 1

Paragraph 3.5.8 Floods

This paragraph refers to flood risk from human activity such as forestry etc. It does not refer to the activity which poses the greatest threat of flooding, i.e. the elimination of natural flood plains and the interference with river banks by building development. Natural flood plains provide temporary reservoirs or balance for flood waters and their elimination can cause flooding upstream. The OPW should be consulted on this matter. An EU Directive will be adapted into Irish law this year which oblige local authorities to take flood risk into consideration in planning policies and decisions. Request that defence of flood plains be included in Co. Dev. Plan.

- **Response:**

These points in relation to flooding are noted. The Flood Directive referred to is currently a Draft - it is suggested that Mayo County Council include a policy to integrate its objectives into the CDP after the Directive enters into force and is transposed into Irish law.

- **Updating of Environmental Report:**

To replace Section 3.5.8:

Human actions which have the potential to affect the risk of flooding in County Mayo include changes in tree cover as a result of forestry operations, infrastructural development and culverting.

With:

Human actions which have the potential to affect the risk of flooding in County Mayo include building upon natural flood plains, building upon river banks, forestry operations, infrastructural development and culverting.

6.5 Submission by An Taisce

Point 1 - SEA Directive

The amendments, particularly in relation to housing settlements patterns and location, entail a radical alteration to the Draft Plan prepared by management which was subject to SEA. The effect of the proposed amendments present enormous implications in spatial planning, transport and climate emissions, and waste water disposal, which have not been assessed. The effect of the proposed Variation would be to further exacerbate Mayo County Council's ratio of car-based development and development

with individual waste water systems, particularly on land with high water tables or poor ground conditions, unsuitable for septic tank proposal.

- **Response:**

The amendments have been evaluated for likely significant environmental effects by Addendum II with regard to the environmental components of biodiversity, fauna, flora, population, human health, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, and landscape which are specified under the SEA Directive. It is noted that the evaluation provided both in the Environmental Report and Addendum II details effects on waste water and transport related greenhouse gas emissions.

- **Updating of Environmental Report:**

After all changes and consultations have been completed, a final version of the Environmental Report will be produced which will include an evaluation of all adopted changes to the Plan. This integration will include the following SEOs, indicators³ and targets.

SEO C1:

To minimise increases in travel related greenhouse emissions to air

Indicator C1i :

Percentage of population within the Plan area travelling to work or school by public transport or non-mechanical means.

Target C1i:

An increase in the percentage of the population travelling to work or school by public transport or non-mechanical means

Indicator C1ii:

Average distance travelled to work or school by the population of County Mayo

Target C1ii:

A decrease in the distance travelled to work or school by the population of County Mayo

Point 2 - Article 6, Habitats Directive

The Draft Plan does not address the requirement of Article 6 of the Habitats Directive, with regard to the evaluation considerations of development affecting SACs.

- **Response:**

A requirement for *appropriate assessments* is provided under the EU Habitats Directive (Directive 1992/43/EEC). Although the findings of appropriate assessments / appropriate assessment screening exercises may be included within or appended to an SEA Environmental Report and although these findings may overlap with those of an SEA, the requirement for and process of appropriate assessment are separate to those of SEA which is required under the SEA Directive (Directive 2001/42/EC).

- **Updating of Environmental Report:**

An appropriate assessment screening report was included in Addendum I, which has been updated and is now included as Appendix I to this Addendum.

³ As measured by the Central Statistics Office