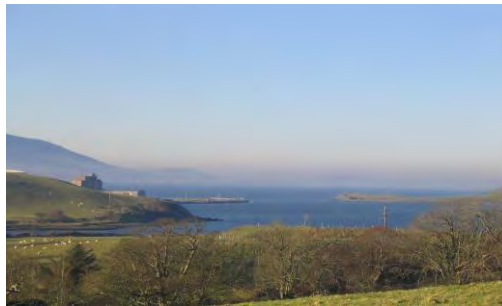


# **APPROPRIATE ASSESSMENT**

## **CONCLUSION STATEMENT**

### **WESTPORT TOWN & ENVIRONS DEVELOPMENT PLAN 2010-2016**



**FEBRUARY 2010**

**In accordance with Article 6(3) and 6 (4) of the  
Habitats Directive 92/43/EEC**



**Mayo County Council**



**Westport Town Council**



## **SUMMARY OF THE PLAN PROCESS AND APPROPRIATE ASSESSMENT**

Westport Town Council, in conjunction with Mayo County Council, commenced the review of the Westport Development Plan 2003 and the Local Area Plans for South Westport, Roman Island and Westport Environs (2005) in March 2008 and has adopted a development plan for Westport town and environs, namely the Westport Town & Environs Development Plan 2010-2016.

The draft plan went on display on 17<sup>th</sup> February 2009 for a period of 12 weeks and written submissions were invited. A copy of the draft plan was sent to the Minister of the Environment Heritage and Local Government, An Bord Pleanála, the prescribed bodies and Mayo County Development Board, as specified under Section 12 (1)(a) of the Planning & Development Acts 2000-2007, on 16<sup>th</sup> February 2009.

The draft plan consists of:

- Westport Town & Environs draft Development Plan 2009
- Proposed Additions to the Record of Protected Structures (Westport Town Council),
- Environmental Report (Strategic Environmental Assessment) and
- Appropriate Assessment.

A Manager's Report (July 2009) was prepared on the submissions and the report set out a summary of the issues raised through submissions or observations received on the Westport Town & Environs draft Development Plan 2009. Within the Manager's Report were a number of recommended amendments to the draft plan.

Following consideration of the Manager's Report and draft plan, a number of amendments to the draft plan were resolved by the members of the planning authorities at meetings held from August 2009 to October 2009<sup>1</sup>. The proposed amendments went on public display on 2<sup>nd</sup> November 2009 for a period of four weeks and were sent to the Department of Environment, Heritage and Local Government. Written submissions were invited on the proposed amendments.

A Manager's Report (November 2009) was prepared on the submissions received on the proposed amendments. The members of the planning authorities made the plan with the proposed amendments on 28<sup>th</sup> January 2010.

Throughout the plan process, all proposed policies and objectives were assessed in terms of their potential impact on the environment (Strategic Environmental Assessment) and on any Natura 2000 site (Appropriate Assessment). The Natura 2000 site in this instance is the Clew Bay Complex (Site Code 001482). The members of the planning authorities were also informed on numerous occasions, at meetings and in writing<sup>2</sup>, the effects the proposed amendments may have on the environment and the Natura 2000 site (Clew Bay Complex).

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<sup>1</sup> See Appendix 3

<sup>2</sup> See Appendix 3

As it was determined that the proposed amendments to the draft development plan, especially those adjacent to or in close proximity to the Natura 2000 site (Clew Bay Complex), would be likely to have a significant effect on the Natura 2000 site, it was recommended that the proposed re-zoning of lands south west of Westport adjacent and in close proximity to the Natura 2000 site should not be zoned as per resolutions of 31<sup>st</sup> August and 02<sup>nd</sup> September 2009. It was recommended that any land use zoning in this area should be as set out on Map 1 of the 'Proposed Amendments to the Westport Town & Environs Draft Development Plan 2009' accompanying the Managers Report (July 2009), which recommended that the majority of lands along the shores of Clew Bay within the plan area be zoned 'N Agriculture/High Amenity'.

However, the plan has been adopted with the proposed amendments which were put on display in November/December 2009, which include the zoning of lands for particular uses, mainly 'A4 Rural Residential' adjacent to the Natura 2000 site – Clew Bay Complex.

This document sets out the Appropriate Assessment Conclusion Statement for the Westport Town and Environs Plan 2010-2016 (as adopted) and:

- Describes the plan in sufficient detail to make clear its size, scale and objectives.
- Describes the baseline conditions, conservation objectives, and relevant ecological and environmental issues in relation to the relevant Natura 2000 sites.
- Identifies potential adverse impacts of the plan on the Natura 2000 sites.
- Is accompanied by supporting documentation, outlined in the Appendices.

This document may be read in conjunction with the following documents:

- The Appropriate Assessment of the Westport Town & Environs Draft Development Plan 2009.
- The Appropriate Assessment of the Proposed Amendments to the Westport Town & Environs Draft Development Plan.

## 1. DESCRIPTION OF THE PLAN

The Westport Town and Environs Development Plan 2010-2016 is a land use plan which provides a development framework for the town and environs of Westport for a period of six years (2010-2016). The Plan consists of:

- A written statement which sets out a development strategy for the town with accompanying policies and objectives and development management standards to implement the development strategy.
- Accompanying Maps which provide a graphical representation of the plan proposals.
- The Strategic Environmental Assessment Statement.
- This Appropriate Assessment Conclusion Statement.

The plan encompasses an area of approximately 1600 hectares or 3,954 acres (Fig. 1). The area stretches from Drumindoo, Castlebar Road (approximately 2km north east of Westport town) to Belclare, Louisburgh Road (approximately 5km south west of the town), and runs adjacent to Clew Bay which is designated as a candidate Special Area of Conservation (Clew Bay Complex) and forms part of the EU Natura 2000 network.

### Westport Town and Environs Development Plan 2010-2016: Plan Area

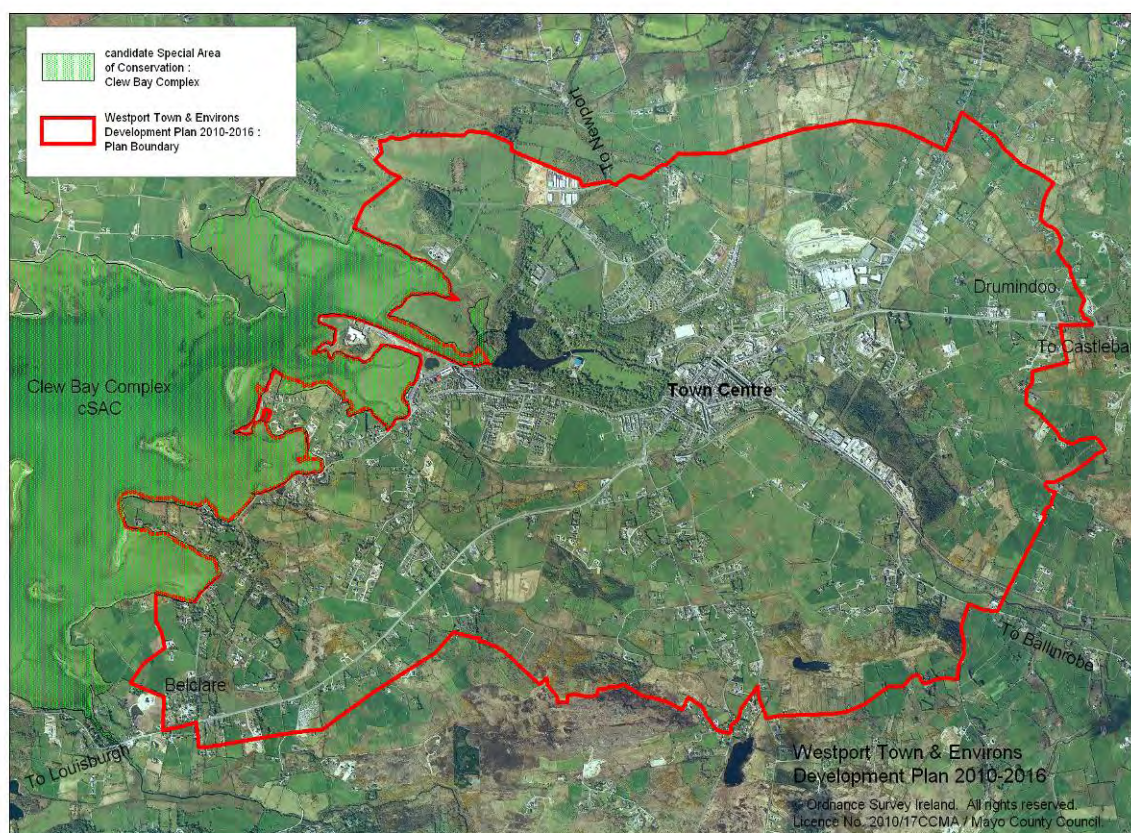


Figure 1: Location Map – Westport & Environs and Clew Bay Complex

The plan can accommodate a population growth in excess of 3,262 households (or in excess of 8155 additional persons). The current population is approximately 6432 persons.

A 'sequential approach' has been incorporated into the plan to allow for the release and development of residential and retail lands on a sequential basis with lands closest to the town centre being given priority.

Approximately 42ha of the Natura 2000 site (0.026% of the entire site area) may be used for marine related development.

## 2. NATURA 2000 SITE – CLEW BAY COMPLEX.

This section sets out the baseline conditions, conservation objectives and relevant ecological and environmental conditions of the Natura 2000 site – Clew bay Complex.

### 2.1 BASELINE CONDITIONS

#### **Name: Clew Bay Complex (Site Code 001482)<sup>3</sup>**

Candidate Special Area of Conservation

Clew Bay is a wide, west-facing bay on the west coast of Ireland. It is open to the westerly swells and winds of the Atlantic with Clare Island giving only a small amount of protection. The drumlin landscape was formed during the last glacial period when sediments were laid down and smoothed over by advancing ice and the sea has subsequently inundated this area, creating a multiple of islands. The geomorphology of the bay has resulted in a complex series of interlocking bays creating a wide variety of marine and terrestrial habitats, including several listed in Annex 1 of the EU Habitats Directive. Within these habitats are numerous species including a good diversity of wintering waterfowl. Clew Bay is considered to have the most significant shingle reserves in the country.

The combination of a wide variety of habitats, including seven listed on Annex I of the E.U. Habitats Directive, and of important flora and fauna, including one Red Data Book plant and two mammals listed on Annex II of the E.U. Habitats Directive, makes the Clew Bay Complex a site of considerable national and international importance.

### 2.2 DRAFT CONSERVATION OBJECTIVES FOR CLEW BAY COMPLEX

**Objective 1:** To maintain the Annex I habitats for which the cSAC has been selected at favourable conservation status: Mudflats and sandflats not covered by seawater at low tide; Coastal lagoons; Large shallow inlets and bays; Annual vegetation of drift lines; Perennial vegetation of stony banks; Atlantic salt meadows (*Glauco-Puccinellietalia maritima*); Embryonic shifting dunes; Shifting dunes along the shoreline with *Ammophila arenaria* (white dunes)

**Objective 2:** To maintain the Annex II species for which the cSAC has been selected at favourable conservation status: *Vertigo geyeri*; *Lutra lutra*; *Phoca vitulina*.

**Objective 3:** To maintain the extent, species richness and biodiversity of the entire site.

**Objective 4:** To establish effective liaison and co-operation with landowners, legal users and relevant authorities.

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<sup>3</sup> See Appendix 1 for full Site Synopsis

### 2.3 RELEVANT ECOLOGICAL AND ENVIRONMENTAL ISSUES OF THE CLEW BAY COMPLEX

“The Status of EU Protected Habitats and Species in Ireland” 2008 (DoEHLG) indicates that the conservation status of the many of Ireland’s habitats and species, including those found within the Clew Bay Complex, is far from satisfactory.

Principle threats to the habitats and species for which the Clew Bay Complex has been selected (and referred to in the draft Conservation Objectives for the Clew Bay Complex) are outlined in “The Status of EU Protected Habitats and Species in Ireland” 2008 (DoEHLG) and are summarised in Table 1 and Table 2 below:

<b>Table 1</b> <b>Clew Bay Complex- Habitats : Ecological and Environmental Issues</b>		
<b>Habitat</b>	<b>Status<sup>4</sup></b>	<b>Threats</b>
Mudflats and sandflats not covered by seawater at low tide	Poor	Aquaculture fishing, bait digging, removal of fauna, reclamation of land, coastal protection works, invasive species, hard coastal defence structures.
Coastal lagoons	Bad	Drainage, natural silting up, water pollution (in the form of excessive nutrient enrichment mostly from agricultural sources but also from domestic effluents).
Large shallow inlets and bays	Poor	Aquaculture, fishing, dumping of wastes and water pollution.
Annual vegetation of drift lines	Poor	Recreational uses (trampling, horse riding, vehicle use), mechanised removal of tidal litter, grazing, sand and gravel extraction, removal of beach materials, sea defence/coastal protection works.
Perennial vegetation of stony banks	Poor	Disruption of sediment supply caused by developments such as car parks and coastal defence structures (rock armours and sea walls), removal of gravel.
Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritima</i> )	Poor	Overgrazing, erosion.
Embryonic shifting dunes	Poor	Natural erosion, recreation, sand extraction, coastal stabilisation
Shifting (white) dunes along the shoreline with <i>Ammophila arenaria</i>	Bad	Removal of beach materials, coastal protection works, motorised vehicles, dune trampling.

<sup>4</sup> Source **The Status of EU Protected Habitats and Species in Ireland** 2008 National Parks and Wildlife Service DoEHLG

<b>Table 2</b> <b>Clew Bay Complex- Species : Ecological and Environmental Issues</b>		
<b>Species</b>	<b>Status</b>	<b>Threats</b>
Geyer's Whorl Snail <i>Vertigo geyeri</i>	Poor	Changes in hydrology
Otter <i>Lutra lutra</i>	Poor	Water pollution, clearance of riparian vegetation
Common (Harbour) Seal <i>Phoca vitulina</i>	Good	Catch in fishing gear, occasional illegal culling, competition for prey resources with fisheries and disturbance of key breeding and moulting haul-out sites.

### 3. POTENTIAL ADVERSE IMPACTS OF THE PLAN ON THE NATURA 2000 SITE

This section of the document sets out the potential adverse impacts the plan will have on the Natura 2000 site, Clew Bay Complex.

“The Status of EU Protected Habitats and Species in Ireland” 2008 (DoEHLG) indicates that the conservation status of habitats and species for which the Clew Bay Complex has been designated as a Natura 2000 site are currently either *poor* or *bad* (with the exception of the Common Seal). The main threats to the habitats and species are outlined in 2.3 above.

It is considered that whilst the policies and objectives of the Westport Town & Environs Development Plan 2010-2016 will not have a significant adverse effects on the Natura 2000 site (Clew Bay Complex), the land using zonings, especially those adjacent to or in close proximity to the Natura 2000 site cSAC Clew Bay Complex, are likely to have a significant adverse effect on the Natura 2000 site.

It is considered that the land use zoning in the Westport Town & Environs Development Plan 2010-2016 would be likely to result in:

- Urban sprawl and lack of consolidation of the existing development around the town centre.
- Minimising the re-use of brownfield sites and maximising greenfield development.
- Adverse impacts upon areas of transitional woodland scrub and other habitats.
- Loss of ecological networks.
- Threaten the integrity and diversity of the Natura 2000 site (Clew Bay Complex).
- Encouraging development that is dependent upon car transport.
- Adverse impacts upon minimising greenhouse gas emissions.
- Potential adverse impacts upon groundwater (part of the subject lands are underlain by an aquifer which is rated by the Geological Survey of Ireland as being “*extremely vulnerable*”).

The zoning for the subject lands would, as outlined in the SEA Addendum II document, be likely to result in significant adverse impacts on a range of environmental components including designated biodiversity areas, flora and fauna, water resources and the landscape.

The zoning would correspond to that of Scenarios 3 and 4 of the SEA Environmental Report which “*would be likely to conflict with various environmental components with mitigation of the adverse effects arising from these conflicts difficult to achieve*”. It is also stated in Addendum II of the SEA Environmental Report that the excessive zoning north east of the plan area is significantly greater than that was envisaged by any of the Scenarios and would result in adverse environmental factors as listed above.

It is considered that the adverse environmental factors resulting from the plan would in turn affect the conservation objectives of the Natura 2000 site - Clew Bay Complex, as set out in 2.2 for the following reasons:-

- The transitional waters of Westport Bay and the Carrowbeg and Carrownalurgan estuaries support a variety of birdlife which are sustained by a flow of nutrients into these waters. The SEA prepared for the Westport Town & Environs Development Plan 2010-2016 indicates that the transitional waters in Westport Bay are currently classified as *(1b) probably at significant risk* to failing to achieve the Water Framework Directive's objectives by 2015. Morphological pressures due to intensive land use are the reason behind the classification for Westport Bay. Point source pollution such as waste water treatment plants and Section 4 (Local Authority licensed discharges) also contribute to its classification.

Zoning large tracks of land for development would, if developed, increase the pressure on the wastewater treatment plant which discharges into the Clew Bay Complex. The design capacity of Westport WWTP is for 15,042 P.E. (Population Equivalent). In 2009, results from an independent accredited laboratory indicated the treatment capacity in 2009 was approximately 50% of design treatment capacity.

The existing population within the plan area is approximately 6,430 persons. Lands have been zoned for an excess of 8,155 persons. Taking into consideration the occupancy potential of vacant properties<sup>5</sup>, any additional industries in the area, seasonal fluctuations resulting from tourism and the provision of zoned land for residential and other uses, it can be deduced that the existing WWTP may not be capable of treating wastewaters which would result from the land use zoning in the plan. Although, theoretically, the PE of the WWTP can be increased, the financial costs of increasing the PE have not been assessed or approved by the DoEHLG and the effects of increasing the WWTP loading on the Clew Bay Complex have not been ecologically assessed.

- There are a number of settlements adjacent to or within the Clew Bay Complex and the cumulative effect of existing and/or future wastewater and other wastes entering into the Clew Bay Complex may pose a significant threat to the Clew Bay Complex.
- Greenfield development involves the building upon and thereby sealing off subsoil as well as top soil. Such sealing can prevent soils from performing certain functions such as drainage. Soil erosion due mainly from surface erosion resulting from construction works has major potential to impact on water quality and fishery/shell fisheries resources
- Any future development along the edges of designated ecological sites would be likely to result in a reduction in habitats and could therefore reduce ecological connectivity on the edges of these sites. In addition within and

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<sup>5</sup> Vacancy rate in Co. Mayo is 24.4% Census 2006

surrounding the plan area, the ecological networks are made up of components including rivers, woodlands, hedgerows, shorelines of Clew Bay and land used for agriculture. Excessive zoning (especially residential in this instance) which may be acted upon will fragment, alter or possibly remove existing ecological corridors which will have adverse effects on flora and fauna found in and adjacent to the Natura 2000 site (Clew Bay Complex), including Annex I habitats and Annex II species for which the site has been designated.

- Greenfield development would adversely impact upon biodiversity and flora and fauna by replacing natural or semi-natural habitats with artificial surfaces, especially where developments would result in the cumulative loss and fragmentation of habitats.
- Greenhouses gases are contributing to climate change. Northwest Europe is expected to become wetter and milder. Overall global temperatures are predicted to rise. Climatic change has the potential to result in the loss of habitats – including those within the Clew Bay Complex - through rising sea levels and increased levels of surface run-off. Some of the coastal habitats, including those for which the Clew Bay Complex was selected as a Natura 2000 site, are important to bird populations and could eventually be inundated. Increased precipitation may disrupt shell fish production and quality in areas such as Westport Bay and the wider Clew Bay area.
- The proposed rezoning will increase car dependency, which will in turn increase emissions into the atmosphere.

Taking into consideration the:

- i. application of the precautionary principle<sup>6</sup>;
- ii. cumulative impact of the land use zoning objectives of the Westport Town & Environs Development Plan 2010-2016;
- iii. excessive re-zoning of lands adjacent to and in close proximity to the Natura 2000 site;
- iv. excessive re-zoning of lands which may contribute to extensive development of the town and environs of Westport and
- v. the environmental pressures/impacts of excessive development,

it is considered that it is likely that the plan will have a significant adverse effect on the Natura 2000 site, Clew Bay Complex.

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<sup>6</sup> The precautionary principle, derived from the EU Treaty and developed in the case law of the ECJ is one of the foundations of the high level of protection pursued by EU Community policy on the environment, and underpins the Habitats Directive (Appropriate Assessment of Plans and Projects IN Ireland Guidance for Planning Authorities 2009 DoEHLG).

#### 4. CONCLUSION

It is considered, having applied the *precautionary principle*, that whilst the text amendments to the policies and objectives of the Westport Town & Environs Development Plan 2010-2016 will not have significant adverse effects on the Natura 2000 site (Clew Bay Complex), the land use zoning objectives as outlined on Map 1 and pages 36 to 45 of the written statement, especially those adjacent to or in close proximity to the Natura 2000 site (Clew Bay Complex), are likely to have a significant adverse effect on the Natura 2000 site.

The members of the planning authorities were duly informed during the plan making process - at meetings and in writing<sup>7</sup> - that the plan as adopted is likely to have a significant adverse effect on the Natura 2000 site.

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<sup>7</sup> Please refer to Appendix 3



## **APPENDICES**



## APPENDIX 1

### SITE SYNOPSIS

#### SITE NAME: CLEW BAY COMPLEX

#### SITE CODE: 001482

Clew Bay is a wide, west-facing bay on the west coast of Co. Mayo. It is open to the westerly swells and winds from the Atlantic with Clare Island giving only a small amount of protection. The drumlin landscape was formed during the last glacial period when sediments were laid down and smoothed over by advancing ice - the sea has subsequently inundated this area, creating a multitude of islands. The geomorphology of the bay has resulted in a complex series of interlocking bays creating a wide variety of marine and terrestrial habitats, including several listed on Annex I of the E.U. Habitats Directive: large shallow bay, lagoon, Atlantic saltmeadows, drift lines, perennial vegetation of stony banks, embryonic shifting dunes, Marram dunes and dune slacks.

Within the shallow bay, subtidal sediments are characterised by typical bivalve communities in fine sand (*Chamelea striatula* and *Ensis* sp.), and by the polychaete worm *Euclymene* and the bivalve *Thyasira flexuosa* in muddy sand. The intertidal sediment communities are characterised by polychaetes and bivalves in the mid-shore and by the sand mason worm *Lanice conchilega* in the low shore. In areas where there is maerl debris with small amounts of live maerl the infaunal community has a mixture of species characteristic of coarse sand (e.g. the bivalves *Timoclea ovata*, *Spisula* sp., and the polychaetes *Nephtys cirrosa* and *Glycera lapidum*) and medium sand (e.g., the bivalve *Ensis* sp. and the polychaetes *Lanice conchilega*, *Scoloplos armiger* and *Sthenelais boa*). The bivalves *Timoclea ovata*, *Tapes rhomboides* and the polychaetes *Branchiommoma bombyx* and *Glycera lapidum* are typical of gravels and medium sands, whereas the bivalves *Abra alba*, *Corbula gibba*, *Thyasira flexuosa* and *Mysella bidentata* and the polychaete *Euclymene* are characteristic of muddy sands.

Beds of live maerl of *Lithothamnion corallioides* are also present in a number of areas.

Around the edges of the inner part of the bay are shores of mixed boulders, cobbles, gravel with some sand and mud. They have a typical zonation of intertidal communities found on sheltered shores of mixed substratum. The shore at Murrisk is unusual as a distinct zone characterised by archiannelids occurs above the sandhopper zone in the upper shore under the boulders and cobbles. This is an unusual habitat. In sheltered areas of shallow water with little sand scour a well developed community of hydroids, sponges and solitary sea squirts is present. Where the sediments includes gravel and mud the species richness in the area can be exceptionally high (180 species). A number of marine species that are rarely recorded are found in Clew Bay: the stalked jellyfish *Lucernariopsis cruxmelitensis*; the polychaetes *Anitides rosea*,

*Clymenura clypeata*, *Pterosyllis formosa* and *Pionosyllis* sp. and the snail *Clypterea chinensis*.

Clew Bay is considered to have the most significant shingle reserves in the country, and has (on the islands) the only examples of incipient gravel barriers in Ireland. Associated with the shingle (and dunes) are good examples of annual vegetation of drift lines. Characteristic species found in these habitats include: Spear-leaved Orache (*Atriplex prostrata*), Red Fescue (*Festuca rubra*), Sea Sandwort (*Honkenya peploides*), Thrift (*Armeria maritima*), Common Scurvygrass (*Cochlearia officinalis*), Sea Mayweed (*Matricaria maritima*) and Sea Campion (*Silene vulgaris* subsp. *maritima*).

Lough Furnace is located at the north-eastern corner of Clew Bay. The lough is a good example of a deep, stratified, saline lake lagoon in a very natural state. Salinity levels can vary considerably here depending on rainfall and tides. The lake is one of the very few permanently stratified lakes known in Ireland and Britain. The lake is ringed by Common Reed (*Phragmites australis*) and Common Club-rush (*Scirpus lacustris*), with small patches of Great Fen-sedge (*Cladium mariscus*) and Bottle Sedge (*Carex rostrata*). Lough Furnace supports a relatively high faunal diversity (41 taxa recorded in the 1996 survey) including a number of important invertebrate species. The relict mysid species *Neomysis integer*, the isopods *Jaera albifrons*, *J. ischiosetosa* and *J. nordmanni*, and two rare amphipods (*Lembos longipes* and *Leptocheirus pilosus*) have all been recorded from the lake. Both Irish species of tasselweed (*Ruppia maritima* and *R. cirrhosa*) occur in the lagoon. Eel, Flounder and Mullet also occur in the lake waters. Mallard nest around the lough, while Saint's Island contains nesting Black-headed Gull.

At the north-western end of Lough Furnace lie two associated lakes, Lough Napransky and Lough Navroony. A stream drains from the latter into the main lake. The area contains flush and quaking-mire vegetation, which is of interest as Irish Heath (*Erica erigena*) is found there, with Bog Moss (*Sphagnum* spp.), Black Bog-rush (*Schoenus nigricans*), Bog Asphodel (*Narthecium ossifragum*), Common Cottongrass (*Eriophorum angustifolium*) and Round-leaved Sundew (*Drosera rotundifolia*). Bog Orchid (*Hammarbya paludosa*), a species listed in the Irish Red Data Book is also found in this area. Beyond the wet area there is a Hazel (*Corylus avellana*) dominated woodland growing over abandoned fields. Birch (*Betula pubescens*), Hawthorn (*Crataegus monogyna*) and Holly (*Ilex aquifolium*) are common, with occasional Oak (*Quercus petraea*). The ground flora contains such species as Bluebell (*Hyacinthoides non-scripta*), Sanicle (*Sanicula europaea*) and Wood-sorrel (*Oxalis acetosella*).

The Rosmurrevagh area in the north of Clew Bay displays a high diversity of habitats, from seashore to dunes and coastal grassland, as well as saltmarsh, bog and fen. The sandy beach on the seaward side grades into dunes of Marram (*Ammophila arenaria*). Adjacent to this, the saltmarsh vegetation, which is approximately 5 m wide, comprises Thrift, Common Scurvygrass, Common Saltmarsh-grass (*Puccinellia maritima*) and 'turf fucoids' (diminutive forms of brown algae). These plant species are typical of Atlantic salt

meadows. Similar saltmarshes occur scattered around the entire shoreline of the bay. Next to the saltmarsh at Rosmurrevagh is an area of coastal grassland with species such as Daisy (*Bellis perennis*), Ribwort Plantain (*Plantago lanceolata*), Dandelion (*Taraxacum officinale*), Heath Wood-rush (*Luzula multiflora*), Common Ragwort (*Senecio jacobaea*) and Yarrow (*Achillea millefolium*).

Flushes introduce a species-rich bog/fen type vegetation. Yellow Iris (*Iris pseudacorus*), Soft Rush (*Juncus effusus*), Irish Heath, Bog Mosses, sedges, Water Mint (*Mentha aquatica*), Bog-myrtle (*Myrica gale*), Bog Asphodel and Cuckooflower (*Cardamine pratensis*) are found.

A further dune system occurs at Bartraw in the south-west of the site. Here Marram and embryonic dunes occur along a shingle ridge which links a small island where dunes also occur. Embryonic dunes, characterised by the presence of Sand Couch (*Elymus farctus*), also occur on some of the islands in the bay.

Important populations of Otter and Common Seal are found in Clew Bay. Both of these species are listed on Annex II of the E.U. Habitats Directive.

The Clew Bay Complex supports a good diversity of wintering waterfowl, with nationally important numbers of Red-breasted Merganser (average maximum of 70 in the winters 1995/96-1999/00) and Ringed Plover (average maximum of 142 in the winters 1995/96-1999/00). A population of Barnacle Geese (between 100 and 200 birds) frequents the islands during winter. Other species which occur in significant numbers include Great Northern Diver (14), Brent Goose (118), Shelduck (74), Wigeon (112), Teal (127), Mallard (64), Oystercatcher (250), Dunlin (450), Bar-tailed Godwit (73), Curlew (373), Redshank (172), Greenshank (10) and Turnstone (27) (all figures are average maxima for the winters 1995/95-1999/00). Species which breed in important numbers include Cormorant (115 pairs in 1985), Common Tern (20+ pairs in 2000/01), Arctic Tern (100+ pairs in 2000/01) and Little Tern (9 pairs in 2000).

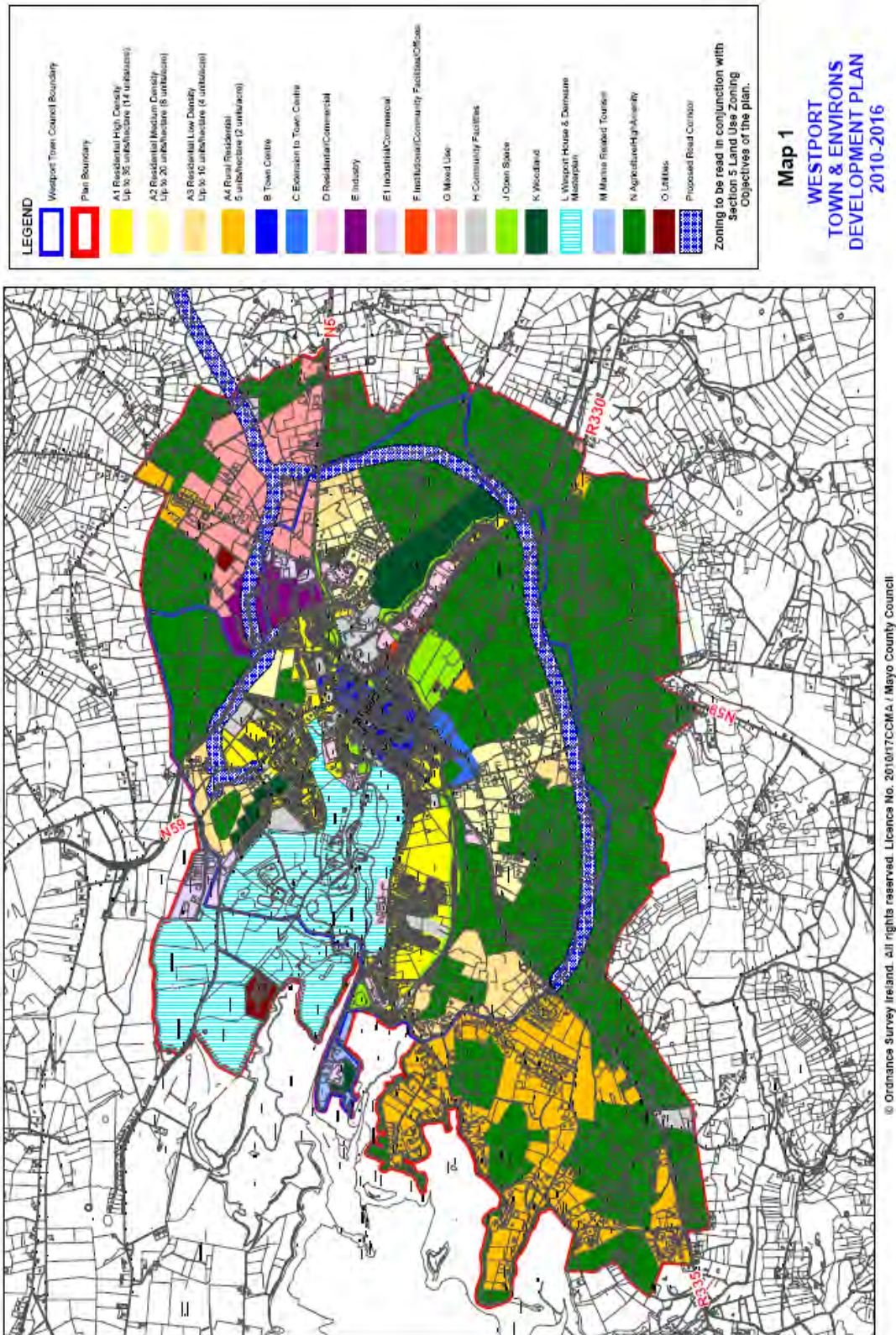
The various tern species, as well as Barnacle Goose, Great Northern Diver and Bartailed Godwit, are listed on Annex I of the E.U. Birds Directive.

The juxtaposition within Clew Bay of a wide variety of habitats, including seven listed on Annex I of the E.U. Habitats Directive, and the combination of important flora and fauna, including one Red Data Book plant and two mammals listed on Annex II of the E.U. Habitats Directive, make this a site of considerable national and international importance.

25.10.2001



## Westport Town & Environs Development Plan - Map 1





## **APPENDIX 3**

### **MEETINGS DATES AND MEMOS CIRCULATED TO MEMBERS OF THE PLANNING AUTHORITIES**

Dates of Meetings held by the planning authorities for the development plan process following the display period of the Westport Town & Environs Draft Development Plan 2009:

31<sup>st</sup> August 2009 – Mayo County Council (Westport Area Members)

2<sup>nd</sup> September 2009 – Mayo County Council (Westport Area Members)

14<sup>th</sup> September 2009 – Mayo County Council (Full Council)

21<sup>st</sup> September 2009 – Westport Town Council

22<sup>nd</sup> September 2009 - Westport Town Council

15<sup>th</sup> October 2009 - Westport Town Council

8<sup>th</sup> January 2010 - Mayo County Council (Westport Area Members)

11<sup>th</sup> January 2010 - Mayo County Council (Full Council)

21<sup>st</sup> January 2010 – Westport Town Council

**Memo circulated to members on 02<sup>nd</sup> September 2009**

**To : Cathaoirleach and Members of Westport Electoral Area Committee.**

**Re : Zoning of Lands at Rosbeg, Rosmalley, Drumminveelaun, Clooneen,  
Cloghan, Streamstown, Belclare, Ardoley, Knockfinn and Clerhaun.**

**September 2<sup>nd</sup> 2009.**

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The lands, which are delineated on the attached map, are zoned as outlined hereunder in the Westport Environs LAP 2005:

*‘A’ To Protect, Improve and Provide for High Amenity / Open Space and recreational Amenities.*

*‘B’ To Provide for the Maintenance and Enhancement of Existing Agricultural Lands.*

*‘C’ To Provide for Mixed Residential Development in Existing and/or New Residential Areas Based on Individual Site Assessment and Integrated Landscape Proposals.*

The Westport Town & Environs Draft Development Plan 2009 proposes to zone the lands referred to above as *Agriculture/High Amenity*.

At the meeting of the Westport Electoral Area Committee held on 31<sup>st</sup> August 2009 to consider the Westport Town & Environs Draft Development Plan 2009 and Manager’s Report, the following information was requested;

- Map indicating the current zoning of the lands in the Westport Environs LAP 2009, with the submissions received during the draft plan display period superimposed over the current zoning.
- Area of land on which submissions were made which are currently zoned for residential development in the LAP 2005.
- Estimate of the number of residential units this area would accommodate if zoned for low density residential development.

During the display period six submissions were received referring to lands in this area, which requested that the lands be zoned ‘Residential’. These submissions referred to almost **36 hectares** (88 acres) of land.

Of these 36 hectares, **24 hectares** are currently zoned ‘C’ in the Westport Environs LAP 2005. The relevant calculations are set out in the two tables hereunder.

<b>Table 1 : Area of Land in Submissions.</b>	
<b>Submission No.</b>	<b>Area of Land (ha)</b>
DDPS-97	2.575
DDPS-11	20.96 0.4741
DDPS-101	0.3971 1.86
DDPS-102	0.9062
DDPS-89	5.299
DDPS-43	0.9688 2.123
<b>Total</b>	<b>35.56ha (87.88 acres)</b>

<b>Table 2 : Area of Land in Submissions currently zoned 'C' in the Westport Environs LAP 2005.</b>	
<b>Submission No.</b>	<b>Area of Land (ha)</b>
DDPS-97	2.575
DDPS-11	14.189
DDPS-101	1.86
DDPS-89	4.6138
DDPS-43	0.9688
<b>Total</b>	<b>24.21ha (59.81 acres)</b>

### **Residential Zoning in Draft Plan.**

Appendix 4 of the *Proposed Amendments* document, which accompanies the Manager's Report, outlines that **46.50ha** is required for residential zoning for the period 2010-2019. This calculation also includes an allowance of 50% for lands which may not become available for development during this period.

Taking into consideration the submissions received from the Department of the Environment, Heritage and Local Government, the National Roads Authority and the Environmental Protection Agency a proposed amended Map 1 has been included in the Proposed Amendments document outlining the most suitable areas for residential development. The amended Map 1 proposes that **58.15ha** be zoned for residential development. This area could accommodate approximately **2,183** households – some **1,008** households more than estimated to be required for the period 2010 - 2019.

### **Zoning Additional Residential Lands.**

Zoning the additional lands above would increase this surplus as follows;

- Zoning lands 'Residential' as per submissions received would add 36 hectares - 89 acres; which at two dwellings per acres equates to an additional **178 households**.
- Zoning lands 'Residential' where submissions were received on lands currently zoned 'C' in the Westport Environs LAP 2005 would add 24 hectares - 60 acres; which at two dwellings per acres equates to an additional **120 households**.

## **Planning Context.**

The key considerations in determining the proper use zoning for this area are;

- The area is serviced by public water supply and public sewer. The area contains a significant number of houses, mainly built in the last decade. The Quay school is located north of the area.
- There are substantial tracts of undeveloped lands closer to Westport town centre which should be developed ahead of this area to ensure the orderly and sustainable development of the town.
- The area has been identified as an *area under Strong Urban Pressure* in the Mayo County Development Plan 2008-2014. Zoning lands for residential development at this location would be contrary to the Mayo County Development Plan 2008-2014 and to the associated Ministerial Direction issued in August 2008.
- The vacancy rate for houses in Mayo in the 2006 Census was 24.40%. There are currently a significant number of unoccupied houses available in Westport to accommodate any future population increase.
- Zoning of additional lands for residential development requires both *Strategic Environmental Assessment* and *Appropriate Assessment* to gauge the impact of the zoning on the environment generally and on the Natura 2000 site Clew Bay Complex respectively. A brief assessment of the impact of zoning the lands in question for residential purposes indicates similarity to Scenarios 3 and 4 as set out in the SEA. These Scenarios indicate that the additional residential development would have social and economic implications, and would impact on Westport's tourism industry.  
- Refer to page 33 Non-Technical Summary Environmental Report of the SEA.

**Taking all of the above into consideration, the zoning of these additional lands for residential development is not recommended.**



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**Peter Hynes,  
Director of Services,  
West Region.**

**Memo circulated to members at meeting on 15<sup>th</sup> October 2009**

**Implications of amended zoning of the  
Westport Town & Environs Draft Development Plan 2009**

**14<sup>th</sup> October 2009**

This document sets out the implications of the amended zoning to the Westport Town & Environs Draft Development Plan 2009 as resolved by Westport Town Council and Mayo County Council to date.

**Implications of Additional Residential Zoning and Revised Densities:**

It is estimated that the population in the plan area will grow by 2,938 persons from the period 2010-2019 (the plan period plus three additional years).

This population increase equates to a requirement of 1,175 additional households from 2010-2019.

The Manager's Report, having regard to submission received on residential zoning, sets out recommended revised residential zoning and densities.

However, applying revised densities as resolved by the members of Westport Town Council at a Special Meeting on 22<sup>nd</sup> September 2009 to the lands now zoned Residential (also resolved by the members), the residential zoning in the Westport Town Council area would yield 1606 households as set out in the table below.

<b>Residential Zoning in draft plan and amendments to date</b>	<b>Revised densities</b>	<b>Area of <u>undeveloped</u> lands</b>	<b>No. of households</b>
A1 High Density	12/acre (30/ha)	20.0ha	600
A2 Medium Density	8/acre (20/ha)	29.3ha	586
A3 Low Density	4/acre (10/ha)	41.4ha	414
A4 Urban Residential	2/acre (5/ha)	0ha	0
A5 Rural Residential	2/acre (5/ha)	1.3ha	6
<b>TOTAL</b>		<b>92ha / 227 acres</b>	<b>1606</b>

The draft plan also includes zoned lands of other zoning categories which may permit residential uses which have not been included in the above calculations namely;

B Town centre

C Extension to Town Centre

D Residential/Commercial

G Mixed Use

L Westport House & Demesne

M Marine Related Tourism

N Agriculture/High Amenity

Brownfield sites may be also redeveloped resulting in a further increase in housing stock.

In addition, re-zoning in the environs area of the draft plan by Mayo County Council members has resulted in substantial amount of land being re-zoned to accommodate an additional 1,657 households.

Therefore the draft plan (with amendments to date) has the potential to yield 3,262 households, **a surplus of 2087 households**. This does not include other zoned lands which should permit residential uses and brownfield sites as outlined above.

The additional zoning has not taken into account the provision of supporting infrastructure such as community facilities, schools, health care, open space, public transport etc.

### **Implications of Commercial/Industrial/Mixed Use Zoning:**

The proposed amendments to date include the zoning of a significant amount of land (c. 65 acres) as 'G Mixed Use' in the Carrowbeg/Monamore/Drumindoo area. This zoning permits a number of uses as set out in the Matrix in the draft plan. In addition the zoning matrix has been altered to permit shopping centre/supermarket in areas zoned E1 Industrial/Commercial. The cumulative effect of such zonings may result in haphazard development at these locations with significant negative effects on the viability and viability of the town centre by shifting retail from the town centre to the Industrial Estate, Newport Road, Berry's, Golf Course Road, 'Former Portwest site', Castlebar Road, Lodge Road and Roman Island. This will also have implications for similarly zoned lands outside the town council area as the matrix covers the town council area and the Environs (MCC) area. It should be noted that the amendment to the matrix has not been resolved by MCC members.

Significant and acclaimed views into Westport town from Sheeaun may also be significantly altered, possibly with the introduction of large warehouse type developments.

It should also be noted that development may not be permitted in such areas due to deficiencies in, or absence of, services such as sewers, water supply and road networks serving the area, traffic safety, and would be contrary to Ministerial guidelines issued to planning authorities. Therefore, zoning the lands for such purposes may be misleading where there may be an expectation to obtain planning permission for development where lands are zoned for such purposes.

The members have indicated that Westport is a unique town and that they do not wish to see it developed as other towns have in the past with multiple warehousing, restaurant drive through etc. on the approach to the town However the amendments made by the members to date to the zoning all support this type of development.

### **Implications of zoning on Heritage:**

The members have indicated that Westport is a unique heritage town. However the members have removed 89 (out of 152) proposed protected structures. The proposed Architectural Conservation Area (ACA), and the proposed extension of the ACA resolved by the members, will provide some form of protection but individual

structures within an ACA are of special importance. The list of proposed protected structures was drawn up as part of the National Inventory of Architectural Heritage by the DoEHLG and the appraisal of such buildings indicates the importance of the buildings which warranted the proposed protection. The removal of 89 proposed protected structures will not assist in preserving the heritage of the town.

### **Implications of zoning on the landscape:**

Westport is an important tourist destination in Ireland and internationally. Westport is set within a landscape characterised by a series of steep, flat-topped drumlins / ridgelines. It is important that development does not interrupt the integrity of the primary ridgelines which form a major part of the uniqueness and spectacular views on the approach roads into Westport. The resolved zoning of lands for residential development on drumlins/ridgelines, especially Horkan's Hill and along the Newport Road, is of major concern due to the negative visual impact any development on these hills will have on all approaches into the town and the landscape setting of Westport. In addition, the orientation of houses on these hills is unlikely to be conducive to good design (e.g. adequate daylighting and usable gardens etc.).

The members are advised that Westport depends on its visual attractiveness and uniqueness for tourism.

### **Environmental Assessments:**

The amended zoning, when completed, will be subject to Strategic Environmental Assessment and Appropriate Assessment. However it should be noted that to date preliminary assessments of resolved amendments indicate that the proposed amended zoning may have significant negative effects on the environment and on the Natura 2000 Site (Clew Bay Complex). Mitigation of such effects may be difficult to achieve. The members are again advised that where the Appropriate Assessment finds that the draft plan will have an adverse effect on the Natura 2000 site, or one cannot be ruled out, the plan **cannot be adopted** unless damage to the Natura 2000 site can be justified in the public interest, once the search of less damaging alternative solutions has been exhausted. (Please refer to page 9 of the Manager's Report for full details).

### **Conclusion:**

**Having regard to the above and to the principles of proper planning and sustainable development it is recommended that the proposed amended zoning as set out in the Manager's Report and accompanying documents is accepted by the members.**