

ENVIRONMENTAL REPORT

**Response to the Environmental Issues arising from
Submissions following the public display of the Proposed
Amendments to the Draft South Dublin County
Development Plan 2010 – 2016 and Environmental Report
- Addendum 2**

INTRODUCTION

Purpose and Contents of the Report

The purpose of this document is to report on the environmental implications of the public submissions on the amendments to the Draft South Dublin County Development Plan 2010-2016. This Environmental Assessment report is submitted to Council Members for their consideration as part of the Managers Report on the public consultation of the proposed amendments to the Draft Plan.

The report forms part of the statutory procedure for the preparation of a new County Development Plan.

A wider description of the legislative background and full list of submissions is contained within the Manager's Report, which this document accompanies.

This environmental assessment deals with issues contained within public submissions which relate to the environmental concerns raised within the 'Environmental Report-Addendum II'. The Addendum II document noted the detrimental or positive environmental impacts of proposed amendments to the Draft Plan, should they be adopted. Responses on the amendments were submitted and assessed in order to ascertain whether the submissions would increase or decrease the environmental effects of the amendments.

A number of submissions related to wider overall issues relating to the Environmental Report or Draft Development Plan. In these instances, reasoning was provided as to compliance with legislation or national and regional plans and guidelines.

In many instances, the assessments recommended that there should be no change to the proposed amendments, as the environmental impact of the amendments in question was positive, neutral or proposed to be mitigated. In other instances it was recommended that the proposed amendment be subject to change in order to mitigate any impacts which may occur. In a minority of instances, it was recommended that the proposed amendment be removed from the Draft Development Plan due to the **significant residual environmental effects** of implementing the amendment. These amendments are not considered capable of mitigation.

The submissions were also assessed for possible impact on the outcome of the screening process of the proposed amendments for Appropriate Assessment under the requirements of

the Habitats Directive. A number of submissions, if adopted, were seen by virtue of their negative impact on protected Natura 2000 sites both within and downstream of the County, to have the potential to precipitate a revision of the screening process. These submissions were deemed to significantly undermine and weaken the proposed policies and objectives in the Plan, principally in relation to the upland areas of the County, thereby potentially triggering a full Stage 2 Appropriate Assessment. In these instances, it was recommended that no change was made to the proposed amendments.

The assessments below are laid out in the same order as the proposed amendments in the Draft Development Plan.

[illegible]

<p>development requirements and zoning requirements.</p> <p>(National Transport Authority) Core Strategy: Comments relating to the legacy of zoned residential land in peripheral locations on the western and southern fringes of the County which has the potential to undermine the Draft Plans emphasis on consolidation. There should be a presumption against any further zoning in peripheral areas and phasing of development of existing zoned lands - phasing should focus on the consolidation of existing urban based areas on the hierarchy of urban centres, and development should be phased to reflect the delivery of and deliverability of public transport. This sequential approach should be incorporated in to the core strategy.</p>	<p>regional plans.</p> <p>Agreed. The Environmental Assessment of proposals for land rezonings in peripheral areas in the county have consistently highlighted the potential for significant residual negative impacts of such actions. The most obvious example includes the rezoning of lands at the outer edge of Tootenhill, Rathcoole from B to A1. The proposed zoning would negatively impact on the flood plain of a tributary of the Griffeen River, associated biodiversity corridor, landscape and increase car travel and car dependency due to the extension of the western edge of Rathcoole.</p> <p>Recommendation: It is considered that the proposed rezonings PA125 Serviced Sites adjoining Villages, PA163 Hazelhatch Marina, PA227 Tootenhill, Rezoning and PA228 land rezoning along the northern side of the N7 Naas Road be omitted in order to prevent significant negative residual impacts.</p>
<p>PA005 0.2.5 Adaptation to climate change</p> <p>(An Taisce) Climate Change: There is little in the plan that demonstrates a commitment to ameliorate the effects of climate change.</p>	<p>The core strategy of the plan is "to respond in a coherent sustainable spatial fashion to the challenges facing this county while building on its strengths and introducing resilience to wider effects of climate change." This has informed the thrust of the policies (including policies on renewable energy and public transport) and objectives within the plan.</p>
<p>PA008 0.3.22 Environmental Policy</p> <p>Reference should be made to the EU Flood Directive and the DoEHLG Flood Risk Management Guidelines.</p>	<p>It is noted that the Flood Directive and the Guidelines are detailed in policy WD13 Risk of Flooding, WD14 Identified Flood Risk Areas,, Policy WD15 Flood Risk Assessment and Management Plans, along with section 2.3,21, 2.3.23, 2.3.25 and SLOs 36, 58 and 203. Recommendation: No change.</p>
<p>PA013 0.5 Land Use Zoning</p> <p>(Environmental Protection Agency) Consideration should be given to amending new objective 'I' to include reference to protect biodiversity of the Liffey Valley.</p>	<p>The 'I' zoning, in tandem with the many other policies and objectives relating to the area in question and the preservation of biodiversity and associated habitats contained within the amended plan will provide sufficient protection for the biodiversity of the Liffey Valley. The proposed Biodiversity Plan will include policies and objectives in relation to areas of particular biodiversity importance including the Liffey Valley. Recommendation: No change.</p>
<p>PA018 1.2.52.i Policy H29</p> <p>Bohernabreena-Glenasmole-Ballinascorney Residents Planning Group. Regarding cluster development in</p>	<p>Notwithstanding the wording utilised in the submission, the Environmental Assessment of the amendments:- PA018 Policy H29</p>

Brittas and Bohernabreena. Proposes that the word "residents" in the first proposed paragraph be replaced by the word "applicants". This paragraph is not consistent with the Sustainable Rural Housing Guidelines 2005 or with Circular SP 5/08- neither are restrictive to residents.

Management of One-Off Housing in Rural Areas; as originally proposed should be reiterated, as the easing of restrictions on housing in the ultra-sensitive areas of Brittas and especially Bohernabreena, high amenity and mountain areas have significant potential to impact significantly on the receiving environment, and in the case of Bohernabreena, directly impact upon a Natura 2000 site.

The original assessment of **PA018** stated:-

*The proposed policy may result in significant negative environmental impacts on biodiversity, protected species, protected sites, landscape, water quality, car dependency and the sustainable use of services, due to additional development of rural housing. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, **significant residual negative impacts are likely.***

The whole amendment as proposed significantly weakens the constraints on housing in rural and upland areas, allowing for urban generated housing to be considered, and cumulatively and individually will result in damage to sensitive environments. Further weakening restrictions on development in these areas will increase the chances of irreparable damage to the landscape, habitats, biodiversity, surface and ground waters, as well as the Bohernabreena SAC and the Dodder, Camac and Owendoher, all of which feed into Dublin Bay which supports a suite of SACs and SPAs.

Recommendation:-

That the recommendations contained within this submission are not adopted and that amendment **PA018** be omitted in order to prevent **significant residual negative impacts**.

Comment relating to Appropriate Assessment:

The rewording proposed in this submission would have significant potential to undermine other policies in the draft development Plan that relate to the management of one-off rural housing, and the management of the sensitive upland landscape of the Dublin Mountains (H29, H30, H31, H33A, LHA13).

<p>(Finnstown Interest Group) Seeks clarification that the facilitation of a cluster-type residential development requires an Appropriate Assessment and if so, Policy H29 should be reconsidered.</p>	<p>The proposal has the real potential to significantly increase the pressure on the environmental carrying capacity of the mountains, thereby directly affecting the Bohernabreena Reservoir and the Natura 2000 site (Glenasmole Valley SAC). The proposal would therefore also challenge the outcome of the Appropriate Assessment Screening process and, due to the additional pressures on the environment that would likely result from this proposed rewording, a reassessment of that AA outcome would be required to be undertaken.</p> <p>Recommendation: That the recommendations contained within this submission are not adopted.</p> <p>Comment relating to Appropriate Assessment: All plans and projects will be required to be screened for possible impact on Natura 2000 sites. SDCC undertakes to fulfil obligations under Article 6(3) of the Habitats Directive as listed in PA144 (LHA9).</p> <p>Recommendation: No Change</p>
<p>PA019 1.2.52.ii Policy H30</p> <p>Bohernabreena-Glenasmole-Ballinascorney Residents Planning Group. Rural amenity and agriculture:- Proposed that the Policy H30(A) be relocated to a new section 1.2.52.i(a) and be renamed as Policy H29(A): Rural Housing Policies and Local Need Criteria- to be consistent with Section 1.2.51 Management of One-Off Housing in Rural Areas. Proposed policy is not consistent with either the Sustainable Rural Housing Guidelines 2005 nor Circular SP 5/08.</p>	<p>Notwithstanding the wording utilised in the submission, the Environmental Assessment of the amendments:- PA019 Policy H30 Rural Amenity and Agricultural Zone; as originally proposed should be re-iterated, as the easing of restrictions on housing in the ultra-sensitive areas of Brittas and especially Bohernabreena, high amenity and mountain areas have significant potential to impact significantly on the receiving environment, and in the case of Bohernabreena, directly impact upon a Natura 2000 site.</p> <p>The original assessment of PA019, stated:-</p> <p><i>The proposed policy may result in significant negative environmental impacts on biodiversity, protected species, protected sites, landscape, water quality, car dependency and the sustainable use of services, due to additional development of rural housing. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, there may be significant residual negative impacts.</i></p> <p>The amendment as proposed significantly weakens the constraints on housing in rural</p>

	<p>and upland areas, allowing for urban generated housing to be considered, and cumulatively and individually will result in damage to sensitive environments. Further weakening restrictions on development in these areas will increase the chances of irreparable damage to the landscape, habitats, biodiversity, surface and ground waters, as well as the Bohernabreena SAC and the Dodder, Camac and Owendoher, all of which feed into Dublin Bay SAC.</p> <p>Recommendation:- The recommendations contained within this submission are not adopted, and that amendment PA019 be omitted in order to prevent significant residual negative impacts.</p> <p>Comment relating to Appropriate Assessment: The rewording proposed in this submission would have significant potential to undermine other policies in the draft development Plan that relate to the management of one-off rural housing, and the management of the sensitive upland landscape of the Dublin Mountains (H29, H30, H31, H33A, LHA13). The proposal has the real potential to significantly increase the pressure on the environmental carrying capacity of the mountains, thereby directly affecting the Bohernabreena Reservoir and the Natura 2000 site (Glenasmole Valley SAC). The proposal would therefore also challenge the outcome of the Appropriate Assessment Screening process and, due to the additional pressures on the environment that would likely result from this proposed rewording, a reassessment of that AA outcome would be required to be undertaken.</p> <p>Recommendation: That the recommendations contained within this submission are not adopted.</p>
<p>PA020 1.2.52.iii Policy H31</p> <p>Bohernabreena-Glenasmole-Ballinascorney Residents Planning Group. Dublin Mountain Zone:- Policy H31(A)- It is proposed that this new Policy be amended to include applicants with exceptional health circumstances. It is proposed that the wording of the proposed new Policy H31(A) be modified to the following:- 1.2.52.iii(a) Policy H31(A): Exceptional Housing Need in Dublin Mountain Zone It is the policy of the Council within</p>	<p>Notwithstanding the wording utilised in the submission, the Environmental Assessment of the amendments:-PA020 Policy H31 Dublin Mountain Zone as originally proposed should be re-iterated, as the easing of restrictions on housing in the ultra-sensitive areas of Brittas and especially Bohernabreena, high amenity and mountain areas have significant potential to impact significantly on the receiving environment, and in the case of Bohernabreena, directly impact upon a</p>

areas designated with Zoning Objective 'H' ("to protect and enhance the outstanding natural character of the Dublin Mountain Area") to consider permitting a new or replacement dwelling on a suitable site where exceptional health circumstances exist, whether such circumstances relate to the applicant themselves or where the applicant is a person such as a Registered General Nurse, caring, nurturing and looking after the health and well being of an immediate elderly family member or relation in the community in a professional capacity that would otherwise require hospitalisation." Section 4.3 of the Sustainable Rural Housing Guidelines provides that planning authorities should consider granting planning permission where the exceptional health circumstances relate to the applicant themselves as distinct from a person under the applicant's care.

Natura 2000 site.

The original assessments of **PA020** stated:-

*The proposed policy may result in significant negative environmental impacts on biodiversity, protected species, protected sites, landscape, water quality, car dependency and the sustainable use of services, due to additional development of rural housing. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, **significant residual negative impacts are likely.***

The amendment as proposed significantly weakens the constraints on housing in rural and upland areas, allowing for urban generated housing to be considered, and cumulatively and individually will result in damage to sensitive environments. Further weakening restrictions on development in these areas will increase the chances of irreparable damage to the landscape, habitats, biodiversity, surface and ground waters, as well as the Bohernabreena SAC and the Dodder, Camac and Owendoher, all of which feed into Dublin Bay which supports a suite of SACs and SPAs.

Recommendation:-

The recommendations contained within this submission are not adopted, and that amendments **PA020** be omitted in order to prevent **significant negative residual impacts**.

Comment relating to Appropriate Assessment:

The rewording proposed in this submission would have significant potential to undermine other policies in the draft development Plan that relate to the management of one-off rural housing, and the management of the sensitive upland landscape of the Dublin Mountains (H29, H30, H31, H33A, LHA13). The proposal has the real potential to significantly increase the pressure on the environmental carrying capacity of the mountains, thereby directly affecting the Bohernabreena Reservoir and the Natura 2000 site (Glenasmole Valley SAC). The proposal would therefore also challenge the outcome of the Appropriate Assessment Screening process and, due to the additional

	<p>pressures on the environment that would likely result from this proposed rewording, a reassessment of that AA outcome would be required to be undertaken.</p> <p>Recommendation: That the recommendations contained within this submission are not adopted.</p>
<p>PA021 1.2.52.iv Policy H32</p> <p>(Liffey Valley Park Alliance) Reference to Agricultural buildings in Policy H32(A) should be caveated to ensure they are situated and designed so as not to impact on the landscape and biodiversity of the Liffey Valley zoned area.</p> <p>(ESB) Comment requesting that the ongoing operations of the Leixlip Power Station site are supported in Development Plan policy and in any future planning application. Critical that ESB are not restricted in any way in fulfilling its mandate as energy supplier, additional lands for expansion must be available for ESB to meet statutory regulations and increasing energy demands.</p> <p>(ESB) Comment regarding support of policy EC9 of the Draft Development Plan and wished to see similar recognition given to its strategic role in the description of the Liffey Valley zoning.</p>	<p>Agreed. The Liffey Valley zoning will protect this important landscape character area. Amend H32(A).1 as follows</p> <p>Recommendation. 1. Development directly related to the areas amenity potential or to its use for agriculture, <i>subject to such being of scale, design, type and overall impact as not to impinge on the landscape, or vistas of the valley or compromise its biodiversity or amenity.</i></p> <p>There are several policies contained within the Draft Plan which reinforce support for the sustainable operation of the Leixlip Power Plant by the ESB (Section 2.3.27.1 Water Supply and Policy EC9 Service Providers and Energy Facilities). This must be balanced with the requirements of the Local Authority and the ESB as stakeholders, to maintain and improve the habitat and biodiversity quality of the Liffey Valley as required by numerous policies and the proposed 'I' zoning within the Draft Plan. Recommendation: No change.</p> <p>It is considered that policy EC9 is sufficient recognition of the role of ESB. The Liffey Valley zoning recognises the high amenity, landscape and habitat value of the valley. Appropriate applications for expansion of the maintenance of the ESB plant at Leixlip will be assessed on their individual merits. Recommendation: No change.</p>
<p>PA023 1.2.52.v(a) Policy H33(A)</p> <p>Bohernabreena-Glenasmole-Ballinascorney Residents Planning Group. Policy H33(A): Rural Communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas is not consistent with the Sustainable Rural Housing Guidelines 2005 or with Circular SP 5/08 neither of which are restrictive to "local residents".It is proposed that the words "local residents" in this new Policy H33(A) be deleted and be replaced by the word "applicants".</p> <p>Bohernabreena-Glenasmole-</p>	<p>Notwithstanding the wording utilised in the submission, the Environmental Assessment of the amendments:-PA023 Policy H33A Rural Communities of Glenasmole Bohernabreena Ballinascorney Brittas as originally proposed should be re-iterated, as the easing of restrictions on housing in the ultra-sensitive areas of Brittas and especially Bohernabreena, high amenity and mountain areas have significant potential to impact significantly on the receiving environment, and in the case of Bohernabreena, directly impact upon a Natura 2000 site.</p> <p>The original assessments of PA018, PA020</p>

Ballinascorney Residents Planning Group.

Rural Communities:- It is proposed that the wording of this new Policy H33(A) be modified to the following:- 1.2.52.v(a) Policy H33(A): Rural Communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas It is the policy of the Council to seek to ensure the long term viability of the rural communities of Glenasmole /Bohernabreena /Ballinascorney /Brittas and to this end, will facilitate applicants who wish to build a family home in their local area. Development proposals for new or replacement dwellings located within the areas of Glenasmole /Bohernabreena /Ballinascorney /Brittas will only be permitted on suitable sites where, • Applicants can establish a genuine need to reside in proximity to their employment; (such employment being related to the rural community) Or • Applicants have close family ties with the rural community.

and **PA023** stated:-

*The proposed policy may result in significant negative environmental impacts on biodiversity, protected species, protected sites, landscape, water quality, car dependency and the sustainable use of services, due to additional development of rural housing. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, **significant residual negative impacts are likely.***

The amendment as proposed significantly weakens the constraints on housing in rural and upland areas, allowing for urban generated housing to be considered, and cumulatively and individually will result in damage to sensitive environments. Further weakening restrictions on development in these areas will increase the chances of irreparable damage to the landscape, habitats, biodiversity, surface and ground waters, as well as the Bohernabreena SAC and the Dodder, Camac and Owendoher, all of which feed into Dublin Bay SAC.

Recommendation:-

The recommendations contained within this submission are not adopted, and that amendment **PA023** be omitted in order to prevent **significant negative residual impacts.**

Comment relating to Appropriate Assessment:

The rewording proposed in this submission would have significant potential to undermine other policies in the draft development Plan that relate to the management of one-off rural housing, and the management of the sensitive upland landscape of the Dublin Mountains (H29, H30, H31, H33A, LHA13). The proposal has the real potential to significantly increase the pressure on the environmental carrying capacity of the mountains, thereby directly affecting the Bohernabreena Reservoir and the Natura 2000 site (Glenasmole Valley SAC). The proposal would therefore also challenge the outcome of the Appropriate Assessment Screening process and, due to the additional pressures on the environment that would likely result from this proposed rewording, a reassessment of that AA outcome would be

	<p>required to be undertaken.</p> <p>Recommendation: That the recommendations contained within this submission are not adopted.</p>
<p>PA054 2.2.9.ii Policy T4A</p> <p>(Quality Bus Network Project Office) underutilised QBCs: Concern regarding 2.2.9.ii Policy T4A Underutilised QBCs. Schemes where bus priority is provided in addition to existing roadway infrastructure are constructed where there is significant demand for public transport and are therefore unlikely to be considered "underutilised" It is requested that this policy be removed.</p> <p>National Transport Authority Underutilised QBCs. Amendment does not identify the QBC's in question. The QBC network should be considered as a whole as the removal of specific segments of the network could undermine its overall benefits. In advance of any reallocation of road space it would need to be demonstrated that there is a lack of public transport demand on the routes in question, taking into consideration the potential for bus route reconfiguration. The amendment is not supported by the NTA.</p> <p>(An Taisce) Underutilised QBCs: SEA Environmental reports assessment of the proposed alteration to QBC's is inadequate in assessing the impact of the proposed change in terms of noise, dust, emissions etc.</p> <p>It should be noted that removing the QBC on the ORR would have a large effect on the removing the QBC would increase the noise on ORR and would be at odds with the aim in the Environmental services section.</p>	<p>As the amendment did not identify the QBCs in question, it was not possible to accurately assess the full impact. It is recognised however, that the thrust of the amendment would have cumulatively negative effects upon the effective operation of the public transport network, would stymie demand as well as having potential to impact on human health through noise and air pollution from increased traffic.</p> <p>Recommendation: That the proposed amendment PA054 be omitted.</p>
<p>PA057 2.2.14 Walking and Cycling</p> <p>(National Transport Authority) The proposed amendment to improve road safety for pedestrians and cyclists by lowering speed limits and priority over motorised transport, should be the ambition for town centres and residential areas, but that approach should not be applied across the board.</p> <p>Recommendation that the amendment is reworded as follows; "Cycle provision, whether integrated with low speed, low volume general traffic in locations such as</p>	<p>The prioritisation of walking and cycling will facilitate reductions in car dependency, car journeys, and greenhouse gas emissions. It is agreed that the recommendation could be substituted for the final paragraph in section 2.2.12 Cycle Policy Framework, as this paragraph relates to the proposed DTO Cycle Policy, which is to be replaced by the NTA National Urban Cycle Manual.</p> <p>Recommendation: Replace final paragraph in section 2.2.12 Cycle Policy Framework with the wording proposed by the NTA.</p>

town centres or residential areas, or segregated from general traffic on higher speed and volume roads, will be provided in line with the forthcoming NTA's National Urban Cycle Manual."	
<p>PA059 2.2.23.i Policy T18</p> <p>(South Dublin Conservation Society) Park and Ride Facilities. - location not marked on the revised Draft Development Plan Map, previous such proposal on north side of leixlip road was refused planning permission. New Policy addition should be removed. Clashes with objective of PA021 and in contradiction to PA158. Object to Park and Ride proposed on any land which comprises the Liffey Valley SAAO or proposed SaaO extension or NHA or land zoned high amenity or agricultural or open space in the Valley.</p> <p>(An Taisce) Park and Ride: In addition to the concerns expressed in the SEA commentary we would point out that the proposed location is not at a public transport node and consequently is not a suitable position for a Park and Ride.</p> <p>(National Transport Authority) supports the provision of park and Ride facilities, however has some concerns in relation to the location of the proposed sites.</p> <p>Tara Co-Op Site- Garters Lane site-Walkinstown Roundabout Site</p> <p>Recommend that the subject of the proposed amendment and the other park and ride sites listed in the Draft Plan should be re-examined and park and ride policy should be revised, including a criteria based approach, identifying whether the proposed sites are rail or bus based and whether they are strategic or local</p>	<p>The effective strategic location of park and ride facilities can assist in the reduction of car journeys, and therefore reduce car dependency and emissions. Unsuitable location of such facilities would be neither cost effective nor be of benefit in terms of attracting users. The NTA submission raises serious concerns regarding three of the proposed park and ride sites in terms of the types of public transport to be served, and the benefits of locations deep within the urban area. This would appear to conflict with the SEOs contained within the Environmental Assessment relating to reducing car movement and emissions.</p> <p>Recommendation: That the proposed amendment PA059 be omitted and that the park and ride policy be amended to include a criterion based approach, identifying whether the proposed sites are rail or bus based and whether they are strategic or local.</p>
<p>PA066 Table 2.2.4 Car Parking Standards</p> <p>(An Taisce) Parking: In this table, the parking standards for dwelling houses and apartments specify a minimum number of parking spaces. This does not take into account the availability of public transport. If too large a provision for parking is made, it will discourage residents from making a modal shift away from car-based travel.</p>	<p>Agreed. It has been noted in a submission from the NTA that parking spaces should be noted as a maximum, which would allow for flexibility of provision in circumstances where land is well served by public transport or is in a town centre location.</p> <p>Recommendation. Amend policy to make parking standards a 'maximum'</p>
<p>PA068 2.2.37 Road Objectives</p> <p>National Roads Association. Road</p>	<p>It is considered that the document noted in</p>

<p>Objectives:- Support intention of the proposed amendment. Council might consider including reference to the NRA 2006 publication, Guidelines for the Crossing of Watercourses, Ducting Construction of National Road Schemes.</p> <p>(Environmental Protection Agency) Amendment to roads objectives welcomed however, consideration should also be given to reference to the need for Appropriate Assessment Screening as appropriate.</p>	<p>section 2.3.37:- 'Requirements for the Protection of Fisheries Habitat during the Construction and Development Works at River Sites' will provide adequate and up to date guidance. Recommendation: No change.</p> <p>Comment regarding Appropriate Assessment All plans and projects will be required to be screened for possible impact on Natura 2000 sites. SDCC undertakes to fulfil obligations under Article 6(3) of the Habitats Directive as listed in PA144 (LHA9). Recommendation: No change.</p>
<p>PA070 Table 2.2.6 Long Term Roads</p> <p>(Brian O'Fiaich) long term roads: Support the removal of the proposed road linking Esker Meadow View with Esker Park.</p> <p>(South Dublin Conservation Society) Long term roads objectives- Object to M50 Overbridge from Red Cow to Ballymount (Public Transport only), it would have a negative effect on the archaeological complex at Ballymount and break up the open space of the Park.</p> <p>(Liffey Valley Park Alliance) Comment in relation to the fact that there are no proposed amendments addressing the significant concerns on the Outer West Route.</p> <p>(Finnstown Action Group) Objects to the proposed route of the 'Outer Western Road' and contends that it should be located further west.</p> <p>(John and Beverly Power) R120 alignment: Objects to the proposed route Option 7a for the R120 Road Improvement Scheme because of its impact on the heritage of the 12th lock.</p>	<p>All stages of environmental appraisal have noted that the removal of this roads objective would lead to less permeability and maintain severance in the future, thereby maintaining car journeys and emissions levels. Recommendation: That the amendment PA070 to remove the proposed link road be omitted.</p> <p>The road layout is indicative and will be subject to further refinement in addition to being subject to EIS. Recommendation: No change.</p> <p>The SEA process identified this route as having potential to have significant negative impacts on watercourses, the Grand Canal, landscape, biodiversity habitats and corridors and heritage. An SLO requiring a sustainability assessment and EIS to examine alternative alignments with particular emphasis on the Grand Canal was included within the Draft Plan as a result. Recommendation: No change</p> <p>The R120 Alignment will have significant impacts on the Grand Canal and associated heritage, biodiversity and landscape. All options will have some level of impact on the Canal. Balancing the impacts on the wider Canal, tow paths, landscape, biodiversity and those which may impact upon the smaller area of the 12th lock, will be of great importance when deciding the most appropriate route. However there are a number of policies within the Draft Plan which give significant protection to the Grand</p>

	Canal and associated biodiversity corridors, including the amendment proposed to Policy LHA22 Protection of the Grand Canal along with increased protection of species and habitats contained within Policy LHA19 Flora and Fauna. Recommendation: No change.
<p>PA074 2.3.10.i Policy WD3</p> <p>(An Taisce) Quality of surface and groundwater: Regarding Policy WD3 Quality of Surface Water and Groundwater, the corollary to this should also apply, namely that development should be limited or stopped completely if the required capacity is not present.</p> <p>(Environmental Protection Agency) Consideration should be given to inclusion of a reference to 'assimilative capacity' of receiving waters as a constraint on discharges to protect ecological integrity.</p>	<p>It is considered that this is what is proposed by the policy. Recommendation: No change.</p> <p>The inclusion of such a reference would strengthen the protection receiving waters. Recommendation: Amend policy to "It is an objective of the Council that sufficient conveyance capacity should be available within the receiving sewerage system locally, sufficient treatment capacity should be available downstream at the relevant Waste Water Treatment Plant and sufficient discharge assimilative capacity be available in the receiving waters to ensure ecological integrity".</p>
<p>PA078 2.4.1 Environmental Services (Finnstown Action Group) Environmental Services:- Seeks the addition of 'and incineration' at the end of Section 2.4.1.</p>	<p>The SEA process has an obligation with respect to national and regional plans and policies. The Waste Management Plan for the Greater Dublin Area, which is a regional plan, includes incineration as part of the waste management policy and envisages a regional incinerator located in Poolbeg. It is considered that the proposed objective to restrict certain types of incineration in the county may have a negative impact on an integrated waste management strategy in the greater Dublin Area and may thereby have a negative environmental impact on sustainable waste management practices. Any proposed incinerator in South Dublin would be subject to the requirements for an Environmental Impact Statement and would be assessed in the context of the policies of the Waste Management Plan for the Dublin Region. Recommendation: No change</p>
<p>PA079 Environmental Services PA079/083/087/089/090/237:-</p> <p>(Finnstown Action Group) Request that a caveat is included to clarify that Biological Treatment does not include MBT plants producing fuel for incineration.</p>	<p>The SEA process has an obligation with respect to national and regional plans and policies. The Waste Management Plan for the Greater Dublin Area, which is a regional plan, includes incineration as part of the waste management policy and envisages a regional incinerator located in Poolbeg. It is considered that the proposed objective to restrict certain types of incineration in the</p>

	<p>county may have a negative impact on an integrated waste management strategy in the greater Dublin Area and may thereby have a negative environmental impact on sustainable waste management practices. Any proposed incinerator in South Dublin would be subject to the requirements for an Environmental Impact Statement and would be assessed in the context of the policies of the Waste Management Plan for the Dublin Region. Recommendation: No change</p>
<p>PA080 2.4.3 Waste Management</p> <p>(Tallaght Residents and Community Umbrella) Waste management strategy:- Objects to the inclusion of that Council's objective that no commercial or publicly-controlled incinerator other than for industrial processes or health purposes be built in South Dublin.</p> <p>(RAID) Waste Management Strategy: Requests that this amendment be removed because it is not consistent with Waste Management Plan for the Dublin Region 2005-2010 and therefore should not be included in South Dublin Development Plan.</p> <p>(RAID) Waste management Strategy: Requests that this amendment be removed because Industrial and healthcare facilities, including hospitals all used licensed hazardous waste contractors approved by the EPA for waste that requires incineration.</p> <p>(An Taisce) Waste management strategy: Remove the line pertaining to industrial or health incineration in the County. The SEA does not assess the environmental impacts of this statement fully.</p> <p>Finnstown Action Group) Waste management strategy:- Objects to the inclusion of wording that supports incineration for health and industrial waste within the County and requests that this wording be deleted.</p>	<p>The SEA process has an obligation with respect to national and regional plans and policies. The Waste Management Plan for the Greater Dublin Area, which is a regional plan, includes incineration as part of the waste management policy and envisages a regional incinerator located in Poolbeg. It is considered that the proposed objective to restrict certain types of incineration in the county may have a negative impact on an integrated waste management strategy in the greater Dublin Area and may thereby have a negative environmental impact on sustainable waste management practices. Any proposed incinerator in South Dublin would be subject to the requirements for an Environmental Impact Statement and would be assessed in the context of the policies of the Waste Management Plan for the Dublin Region. Recommendation: No change.</p>
<p>PA081 2.4.5 Waste Management</p> <p>(RAID) Waste Management Plans: Proposes the re-introduction of the word 'further' into AMENDMENT REF. NO. PA081 as a solution to any concerns relating to current practices in the County so that the wording would be as follows; 'No further waste-to-energy incinerator or waste-to-energy thermal treatment facility will be situated in the</p>	<p>The SEA process has an obligation with respect to national and regional plans and policies. The Waste Management Plan for the Greater Dublin Area, which is a regional plan, includes incineration as part of the waste management policy and envisages a regional incinerator located in Poolbeg. It is considered that the proposed objective to restrict certain types of incineration in the county may have a negative impact on an</p>

County.'	integrated waste management strategy in the greater Dublin Area and may thereby have a negative environmental impact on sustainable waste management practices. Any proposed incinerator in South Dublin would be subject to the requirements for an Environmental Impact Statement and would be assessed in the context of the policies of the Waste Management Plan for the Dublin Region. Recommendation: No change.
PA083 2.4.6.ii Policy ES3 Greenstar. Recycling and Composting Targets: Support for the replacing of 'composting' with 'biological treatment'.	Noted.
PA094 2.4.25 Air Quality (Finnstown Action Group) The compounds referenced for monitoring should also include those emitted from the IPCC and Seveso plants within the County	Those compounds are monitored under license by the EPA. Recommendation: No change
PA099 2.5.8 Telecom Antennae (Keep Ireland Open) Telecommunications Antennae and Support Structures: Note the reference to the need to take into consideration possible impacts on any existing public right of way on page 78 at the end of the 3rd pt in the list of pts. The same wording should be included in a policy. This would bring the plan into line with Meath 4.11.4 – page 191 –1st para –4th line & DLR – 16.14 – last pt. Add: or walking routes to 'Wind Energy' 4th pt be consistent with 2.5.11.	It is considered that the wording contained in the Draft Plan is sufficient. Regarding the final point, it should be noted that PA104 relating to Energy and Communications Infrastructure requires assessment of the impact of proposals on rights of way. Recommendation: No change.
PA100 2.5.9 Renewable Energy (An Taisce) Renewable energy: The investigation of geothermal energy is laudable, but should not be tied into a requirement for residential development.	The amendment was tied into the requirements of the Core Strategy, which notes no requirement for the expansion of residentially zoned land. Recommendation: No change.
PA104 2.5.15 Energy Infra. In Sensitive Landscapes (Keep Ireland Open) Energy Communications Infrastructure in Sensitive Landscapes: Add: and walking routes in 4th pt in list of pts. This would be consistent with 2.5.11. (Environmental Protection Agency) Energy and Communications infrastructure in sensitive landscapes should also require	Agreed. The amendment to section 2.5.11 (PA103) relocated the issues subject to assessment to section 2.5.15 (PA104) . In doing so, the requirement to include the impact of development proposals on walking routes was omitted. Recommendation: Include 'and walking routes' within point four of section 2.5.15. Policy EC10 Telecommunication Infrastructure in Sensitive Landscapes, will require applications to be accompanied by an

<p>Visual Impact Assessment to be carried out and that the Habitats Directive and EIA Directive requirements are addressed</p>	<p>assessment of potential visual impacts and avoidance.</p> <p>Comment regarding Appropriate Assessment All plans and projects will be required to be screened for visual impact assessment and possible impact on Natura 2000 sites. SDCC undertakes to fulfil obligations under Article 6(3) of the Habitats Directive as listed in PA144 (LHA9).</p> <p>Recommendation: No change.</p>
<p>PA107 3.2.9.x Policy EE11(a)</p> <p>(Hugh Lynn, Citywest) Offices 1,000m2; Add the following sentence to proposed amendment- 'Offices 100-1,000sq.m and Offices over 1,000sq.m will be Permitted in Principle in Citywest Business Campus recognising the public transport provision and long established office use in this location'.</p> <p>(South Dublin Conservation Society) Offices over 1000m2 in EP2 zone- Support the comment made in the Environmental Report in relation to this policy, any such development should be conditional on good public infrastructure being in place.</p> <p>(An Taisce) Offices over 1,000m2 in EP2 areas:- This is a retrograde step. There is sufficient properly zoned land in the county to allow for offices in suitable areas without this measure.</p>	<p>The assessment contained within Addendum II to the Environmental Report notes that significant negative environmental residual impacts may be likely to result from such offices being open for consideration in EP2 zoned land without mitigation such as requiring such offices to be within 400m of high quality public transport.</p> <p>Recommendation: Amend PA107 as follows; It is the policy of the Council that offices over 1,000 m2 in EP2 areas shall be considered in areas where the planning authority is satisfied that such development will be within 400m of high quality public transport and the scale of the office reflects the existing scale and layout of the existing area. Underground car parking will not be considered appropriate for such uses in EP2 locations.</p>
<p>PA109 3.2.21.ii Policy EE39</p> <p>(RAID) Restriction Area at Casement Aerodrome: Submission requests that this amendment be deleted because the area around Casement Aerodrome is not accessible by public transport and is not located along a public transport corridor. There is also no direct access onto the N7 for any proposed development in this site and any such access would not be allowed by the NRA</p> <p>(RAID) Submission requests that this amendment be deleted because Industrial development around Casement Aerodrome would have a negative impact on river systems in the area, many of which are already highly polluted. It would also negatively impact on biodiversity corridors established in the area as the green belt</p>	<p>Amendment (PA109) relates to insertion of the appropriate name for Casement Aerodrome, and would have no significant environmental effects.</p> <p>However, it was noted within an assessment of the Councillors Motions (April 2010) at the Draft Development Plan stage that adoption of motions to amend the security consultation zone and restriction area at Casement Aerodrome could have significant additional effects on river systems, such as the Camac (an already stressed and polluted river system) and biodiversity corridors due to increased pressure for rezoning from B Agriculture to other development zonings.</p> <p>Significant impacts on the landscape would be envisaged if the amendments proposed</p>

<p>established by the Aerodrome contracts due to development.</p> <p>(RAID) Submission requests that this amendment be deleted because Industrial development of these lands would reduce the amount of open space afforded to the villages of the Rathcoole and Newcastle. Currently the restrictions have enabled the villages to retain their village character as the scale, mass and height of development has been shaped by the requirements of the Department of Defence.</p> <p>(SIAC) Restriction Area at Casement Aerodrome:- All references to the previous 'no-development restriction' should be removed from the plan or amended in accordance with the adopted Council motions. Request that Policy EE39 be amended or omitted from the plan.</p>	<p>were to be adopted, thereby reducing restrictions on developing lands around Casement Aerodrome, coupled with the rezoning of lands from the 'B' Agriculture zoning. Retaining the agricultural use would result in lesser impact from the reduction of the restriction zone. Reducing the restriction zone, and rezoning the lands for development purposes however was assessed as having a most detrimental effect on the receiving environment and the Development Strategy of the Draft County Development Plan.</p>
<p>PA110 3.2.21.ii(a) Policy EE39A</p> <p>(Dept of Def.) Policy EE39A: Casement Aerodrome- Security Consultation Zone. Dept. of defence policy to maintain the current restricted area of 400 metres. Council would be acting outside its remit to amend the policy of a Government Department.</p> <p>(South Dublin Conservation Society) Casement Aerodrome security consultation zone- Object to the policy, opens up Casement Aerodrome for civilian use, object to on grounds of environmental impact.</p> <p>(SIAC) Security Consultation Zone:- Requires a clear statement that the Department of Defence Security Zone Restriction around Casement Aerodrome has been amended to become a Security Consultation Zone. Contends that proposed amendments made to Policy EE39A are made up of incomplete parts of two different motions (Motions 239 and 242) and therefore 'dilutes' the thrust of the motions adopted. Requests that the policy be amended to reflect the motions adopted by the members of the Council.</p> <p>(Con McCarthy) Security consultation zone: The submission contends that the zoning of the land within the security consultation zone between Greenogue business park/aerodrome business park and the airfield on the western and southern sides</p>	<p>It was noted within an assessment of the Councillors Motions (April 2010) at the Draft Development Plan stage that adoption of motions to amend the security consultation zone and restriction area at Casement Aerodrome could have significant effects on river systems, such as the Camac (an already stressed and polluted river system) and biodiversity corridors, but these were likely to be mitigated.</p> <p>Significant additional impacts on the landscape and habitats which are unlikely to be mitigated would be envisaged if the proposed amendments to the security zones and runway restrictions were to be adopted along with a subsequent rezoning for the surrounding lands from 'B' agriculture, to industrial zoned lands. As a consequence, any change from the current 'B' Rural Amenity and agriculture zoning would be likely to result in significant residual negative impacts.</p> <p>Recommendation: No change.</p> <p>The excessive rezoning of lands around Casement Aerodrome has been consistently noted in the environmental assessment as having potential to undermine the development strategy of the Development Plan, create significant landscape,</p>

<p>should be changed in line with the rezoning proposed under PA228, reflecting the changes to the security zone restrictions at Casement Aerodrome under PA110.</p>	<p>biodiversity corridor, transport, river (Camac) and flooding impacts as well as increasing car usage, facilitating urban sprawl. Recommendation. No change.</p>
<p>PA112 3.2.22 Aerodrome Guidance</p> <p>(RAID) Amend the proposed amendment to section 3.2.22 to replace the corresponding sentence with the following: However, within the 'red' zones', some development is permissible whereby the development could not increase the number of people living at the property to the approval of the Department of Defence.</p> <p>(SIAC) Development in the vicinity of aerodromes:- Requests that the criteria for determining the acceptability of development within the red zones should be in accordance with national and international best practice, as applied at Dublin, Cork and Shannon airports.</p>	<p>Removal of the restrictions applied to the lands around Casement Aerodrome have potential to negatively impact on biodiversity, landscape, habitats, flooding and watercourses, however, these effects are likely to be mitigated, as long as the surrounding lands remain in agricultural use. Recommendation. No change</p>
<p>PA113 3.2.24.vii Policy EE49</p> <p>(Electrolux) Risk assessment:- Seeks further reduction to the proposed consultation distance for development proximate to the Irish Distillers and Tibbet & Britten Group sites (on the basis that the development potential of the Electrolux site could be adversely affected).</p>	<p>The consultation distance has been set by the Health and Safety Authority. Unnecessary reduction of the consultation distance may result in significant negative consequences regarding human health issues. Recommendation: No change.</p>
<p>PA120 3.3.19(ii) Policy TDL21(a)</p> <p>(Environmental Protection Agency) This should refer to the sustainable development of Lucan Village</p>	<p>Agreed. Recommendation: Amend to It is the policy of the Council to facilitate the preparation of a more strategic and forward looking vision and strategy for the future sustainable development of Lucan Village to address matters such as urban design, land-use, traffic management, environmental improvements and urban centre management, including:</p>
<p>PA122 3.3.19(iv) Policy TDL21(c)</p> <p>(Environmental Protection Agency) This should refer to the sustainable development of Templeogue Village</p>	<p>Agreed. Recommendation: Amend to It is the policy of the Council to facilitate the preparation of a more strategic and forward looking vision and strategy for the future sustainable development of Templeogue Village to address matters such as urban design, land-use, traffic management, environmental improvements and urban centre management, including:</p>
<p>PA125 3.3.24.vii Policy TDL 28(a)</p> <p>(An Taisce) Serviced residential sites: Welcome any attempt to limit ribbon development and the blight of one-off</p>	<p>Agreed. The assessment in the SEA Addendum considered that the proposed amendment may result in significant</p>

<p>housing. Any serviced sites that the Council prepares should be part of an existing consolidated development, with connections to mains water and sewerage and as part of a plan to develop an area. Any move in this regard should be subject to the normal public scrutiny and through the normal planning process. Including appropriate assessment. The use of Council land for this purpose must go through the full public consultation and the planning process</p> <p>(EPA) (PA125, PA163, PA164, PA227 and PA228). Obligation to ensure the Proposed Amendments do not conflict with Policies/Objectives in the Draft Regional Planning Guidelines for Guidelines for the greater Dublin Area 2010-2022.</p>	<p>residual negative impacts to waterbodies, flooding, heritage, landscape, biodiversity of the rural village areas.</p> <p>Recommendation: That the proposed amendment PA124 be omitted in order to prevent significant negative residual impacts.</p> <p>PA125 Serviced Sites adjoining Villages, has been identified in the SEA assessment as being likely to result in significant negative residual impacts. These proposed amendments also appear to conflict with the strategic policies contained within the Regional Planning Guidelines (RPGs) for the Greater Dublin Area 2010-2022, as made in June 2010 i.e. Strategic Policy SP1 relating to sustainable residential development and/or Strategic Policy EP2 relating to sustainable economic growth and reduced volumes of commuting.</p> <p>Recommendation: It is considered that these proposed amendment/rezoning PA125 be omitted in order to prevent significant negative residual impacts.</p>
<p>PA126 3.4.3.iii Neighbourhood Centre</p> <p>(Tesco) neighbourhood/small town/ village centre: Oppose amendment reducing maximum floorspace for convenience stores permitted in Neighbourhood Centres from 2,500 to 1,500m2.</p>	<p>Noted.</p>
<p>PA135 4.2.9.ii Policy AA8</p> <p>(Liffey Valley Park Alliance) Comment in relation to Architectural Conservation Areas and the designation of parts of the Liffey Valley as such.</p>	<p>The Draft Development Plan contains significant policies which safeguard the biodiversity, landscape and heritage of the Liffey Valley, including the new Liffey Valley 'I' zoning.</p> <p>Recommendation: No change</p>
<p>PA138 4.3.6 Biodiversity</p> <p>(Liffey Valley Park Alliance) Comments on the listing of herb-flora species and the location of such in the Liffey Valley</p>	<p>The SEA is not meant to be utilised as a detailed biodiversity database. The baseline section of the report notes areas of significance, along with issues which affect biodiversity through the county, as well as areas where a lack of information constrained assessment. It is contended that LHA15 Heritage and Biodiversity Plan, which the SEA noted was urgently required (Env. Rep. Section 3.3.8 final paragraph) would assist in identifying local areas of biodiversity value.</p> <p>Recommendation: No change</p>
<p>PA140 4.3.7.ii Policy LHA4</p>	

<p>(Liffey Valley Park Alliance) Liffey Valley SAAO- welcome the acknowledgement of the importance of the SAAO however objectives are very unspecific and vaguely articulated. Suggest wording as follows: "Undertake steps and works necessary to secure an extension of the current Liffey Valley SAAO- in both length and width in order to: A) provide for more effective protection for the lands within the SAAO which has been defined in too narrow and short parameters to effect any real protection to the lands; and B) to provide for lands adjoining the current SAAO which warrant a similar level of protection."</p>	<p>It is acknowledged that the SAAO provides a high level of protection for the Liffey Valley and associated habitats and species. It should be noted however, that there are several planning layers of protection of the Liffey Valley within the Draft Plan such as the creation of a specific 'I' zoning for the Liffey Valley which will protect this important landscape, and which covers a substantial land area, both in width and length, LHA3 – 7 pertaining to the Liffey Valley SAAO and Liffey Valley Park, and policy LHA13 Development within Liffey Valley, High Amenity or Mountain Area.</p> <p>Recommendation: No change.</p>
<p>PA143 4.3.7.v Policy LHA7</p> <p>(An Taisce) Liffey Valley Park: The document 'Towards a Liffey Valley Park' is narrow in outlook. The Council should look to expand this policy's horizons past the bounds of this report and provide real protection for the valley; which is one of Dublin's natural treasures.</p>	<p>The amendments to the plan will result in several policies within the Draft Plan relating to the protection and management of the River Liffey and Valley, including the creation of a specific zoning for the Liffey Valley which will protect this important landscape character area, LHA3 – 7 pertaining to the Liffey Valley SAAO and Liffey Valley Park, and policy LHA13 Development within Liffey Valley, High Amenity or Mountain Areas in addition to other protections to the existing character of the area.</p> <p>Recommendation: No change.</p>
<p>PA144 4.3.7.vii Policy LHA9</p> <p>(National Roads Design Office) Policy LHA9 Impacts on Natura 2000 Sites is legally incorrect at law as it does not fully reflect the provisions of Article 6 of the Habitats Directive in that it does not have regard to Article 6(3).</p> <p>(National Roads Authority) Concern in relation LHA9. It is recommended that the proposed policy should be reviewed and redrafted so as to fully reflect and be consistent with the relevant provisions of the European Communities (Natural Habitats) Regulations, 1997 (S.I. No 94 of 1997).</p>	<p>Comment Relating to Appropriate Assessment:- Recommendation: in the interests of clarity, reproduce the precise wording of Article 6(3) as follows</p> <p><i>Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.</i></p> <p>Comment Relating to Appropriate Assessment:- Recommendation: in the interests of clarity, reproduce the precise wording of Article 6(3) as follows</p> <p><i>Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination</i></p>

	<p><i>with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.</i></p>
<p>PA146 4.3.7.xi Policy LHA13</p> <p>Bohernabreena-Glenasmole-Ballinascorney Residents Planning Group. Policy LHA13; Comment relating to deletion of all references to the Dublin Mountain Area, Mountains Area or Development Plan Zoning Objective H from the Policy.</p>	<p>Notwithstanding the wording utilised in the submission, the Environmental Assessment of the amendments:-</p> <p>PA018 Policy H29 Management of One-Off Housing in Rural Areas;</p> <p>PA019 Policy H30 Rural Amenity and Agricultural Zone;</p> <p>PA020 Policy H31 Dublin Mountain Zone</p> <p>PA023 Policy H33A Rural Communities of Glenasmole Bohernabreena Ballinascorney Brittas</p> <p>PA146 Policy LHA13 Development within Liffey Valley, High Amenity Areas or Mountain Areas. as originally proposed should be re-iterated, as the easing of restrictions on housing in the ultra-sensitive areas of Brittas and especially Bohernabreena, high amenity and mountain areas have significant potential to impact significantly on the receiving environment, and in the case of Bohernabreena, directly impact upon a Natura 2000 site.</p> <p>The original assessment of PA019, stated:-</p> <p><i>The proposed policy may result in significant negative environmental impacts on biodiversity, protected species, protected sites, landscape, water quality, car dependency and the sustainable use of services, due to additional development of rural housing. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, there may be significant residual negative impacts.</i></p> <p>The original assessments of PA018, PA020 and PA023 stated:-</p> <p><i>The proposed policy may result in significant negative environmental impacts on biodiversity, protected species, protected sites, landscape, water quality, car dependency and the sustainable use of services, due to additional development of rural housing. While some conflicts would be likely to be mitigated by measures which have been integrated into the draft Plan, including those which have arisen from the SEA process, significant residual negative impacts are likely.</i></p>

	<p>The amendments as proposed significantly weaken the constraints on housing in rural and upland areas, allowing for urban generated housing to be considered, and cumulatively and individually will result in damage to sensitive environments. Further weakening restrictions on development in these areas will increase the chances of irreparable damage to the landscape, habitats, biodiversity, surface and ground waters, as well as the Bohernabreena SAC and the Dodder, Camac and Owendoher, all of which feed into Dublin Bay SAC.</p> <p>Recommendation:- The recommendations contained within this submission are not adopted, and that amendments PA018, PA019, PA020, and PA023 be omitted in order to prevent significant negative residual impacts.</p> <p>Comment relating to Appropriate Assessment: The rewording proposed in this submission would have significant potential to undermine other policies in the draft development Plan that relate to the management of one-off rural housing, and the management of the sensitive upland landscape of the Dublin Mountains (H29, H30, H31, H33A, LHA13). The proposal has the real potential to significantly increase the pressure on the environmental carrying capacity of the mountains, thereby directly affecting the Bohernabreena Reservoir and the Natura 2000 site (Glenasmole Valley SAC). The proposal would therefore also challenge the outcome of the Appropriate Assessment Screening process and, due to the additional pressures on the environment that would likely result from this proposed rewording, a reassessment of that AA outcome would be required.</p> <p>Recommendation: That the recommendations contained within this submission are not adopted.</p>
<p>PA151 4.3.7.xviii Policy LHA20</p> <p>(An Taisce) River/Stream Management: The setback of development of 10m from the top of a bank is not sufficient. This should be changed to 15m at a minimum.</p>	<p>The noted sections, 2.3.9 and 4.3.7xvii are both proposed for amendment to allow for increased riparian corridors under particular circumstances. Recommendation: No change.</p>
<p>PA152 4.3.7.xx Policy LHA22</p> <p>(Keep Ireland Open) Protection of the Grand Canal: Submit that policy fails to</p>	<p>The amendment proposed acknowledges the potential negative impacts which the Grand</p>

<p>acknowledge the importance of the Canal for recreation – in particular walking and cycling. The absence of a positive attitude to cycling by Waterways Ireland has always been greatly disappointing. Of course, we totally oppose any proposal, other than provision of a cycleway, which would impinge on the tow path and the hedgerows and trees bordering the canal must be protected. We submit therefore that you should delete on 3rd line primarily as a natural biodiversity resource and substitute both as a natural biodiversity resource and as a recreational resource(particularly for walking and cycling).</p> <p>(An Taisce) Protection of the Grand Canal: We would reference the devastation visited upon the Grand Canal in the creation of a cycling and pedestrian route. We hope that policy LHA22 will remind the Council of the requirement to preserve the Grand Canal pNHA and its biodiversity, which includes a number of species protected under both the Habitats and Birds Directives.</p>	<p>Canal may suffer if not adequately protected against inappropriate proposals. Appropriate proposals, which retain the landscape, heritage character and biodiversity of this premier waterbody would be considered based on merit.</p> <p>Recommendation: No change.</p> <p>The amendment proposed to Policy LHA22 Protection of the Grand Canal further reinforces this preservation of the Canal and associated biodiversity. Recommendation: No change.</p>
<p>PA160 LZO 6 Greenogue</p> <p>(RAID) Greenogue: Submission states that regarding the reclassification of zoning land at Greenogue from EP2 to EP3, these locations do not have good access to the major road network as required by the EP3 classification</p>	<p>The lands are located proximate to the Rathcoole interchange with the N7.</p> <p>Recommendation: No change.</p>
<p>PA163 New LZO Hazelhatch Marina</p> <p>(An Taisce) Hazelhatch Marina: This proposal would require clarification and an EIS. The creation of a marina at Hazelhatch could be very detrimental to the area. We would not be in favour of this.</p> <p>Environmental Protection Agency) (PA125, PA163, PA164, PA227 and PA228). Obligation to ensure the Proposed Amendments do not conflict with Policies/Objectives in the Draft Regional Planning Guidelines for Guidelines for the greater Dublin Area 2010-2022.</p>	<p>Agreed. The assessment in the SEA Addendum considered that the proposed amendment may result in significant residual negative impacts to habitats, heritage, landscape and biodiversity to the Grand Canal.</p> <p>Recommendation: That the proposed amendment PA163 be omitted in order to prevent significant negative residual impacts.</p> <p>PA163 Hazelhatch Marina has been identified in the SEA assessment as being likely to result in significant negative residual impacts. These proposed amendments also appear to conflict with the strategic policies contained within the Regional Planning Guidelines (RPGs) for the Greater Dublin Area 2010-2022, as made in June 2010 i.e. Strategic Policy SP1 relating to sustainable residential development and/or Strategic Policy EP2 relating to sustainable economic growth and reduced volumes of commuting.</p>

	<p>Recommendation: It is considered that these proposed amendment/rezoning PA163 be omitted in order to prevent significant negative residual impacts.</p>
<p>PA164 New LZO Citywest Resort</p> <p>(Environmental Protection Agency) Comment in relation to a number of Proposed Amendments described as having potential for negative environmental effects prior to mitigation measures being established (PA164) Obligation to ensure the Proposed Amendments do not conflict with Policies/Objectives in the Draft Regional Planning Guidelines for Guidelines for the greater Dublin Area 2010-2022.</p> <p>(Environmental Protection Agency) (PA125, PA163, PA164, PA227 and PA228). Obligation to ensure the Proposed Amendments do not conflict with Policies/Objectives in the Draft Regional Planning Guidelines for Guidelines for the greater Dublin Area 2010-2022.</p>	<p>It is considered that the proposed amendment does not conflict with the Policies/Objectives in the Draft Regional Planning Guidelines for Guidelines for the greater Dublin Area 2010-2022. Recommendation: No change.</p> <p>It is considered that PA164, relating to the Citywest Resort, can be mitigated in order to reduce landscape and traffic impacts. Recommendation: No change.</p>
<p>PA183 New SLO Rockbrook School</p> <p>(An Taisce) Rockbrook School: This objective may have implications on the locality. We are opposed to this in principle.</p>	<p>SEA assessment of this SLO resulted in concerns being raised and taken into account regarding the presence of a biodiversity corridor in the area. In addition, development above the 120m contour will be required to submit assessment and mitigation regarding potential visual impacts, as required by Policy LHA14 Development below the 120m contour. Recommendation: No change.</p>
<p>PA184 New SLO Tandy's & Esker Lane</p> <p>(National Roads Association) Tandy's Lane and Esker Lane Exit to N4. NRA agreeable to liaise further with the Council, though there is a presumption against re-openings considering the upgrade of the N4 Lucan Bypass and potential traffic and safety implications.</p>	<p>Noted. It is noted throughout the Environmental Assessment stages that the reopening of the access points onto the N4 would have negative consequences regarding reduction in car movements and transport based emissions. Recommendation: That the proposed amendment PA184 be omitted.</p>
<p>PA188 New SLO 12th Lock Masterplan</p> <p>(John and Beverly Power) 12th Lock Masterplan: Support for proposed new SLO – 12th Lock Masterplan subject to the following changes: • The Grand Canal Way should be developed on the north side from the 12th Lock westward to Hazelhatch but not on the south side • The introduction of a traffic control facility for cyclists safety at the 12th Lock Bridge • The inclusion of the 3-storey mill building should be included within the list of Protected Structures • The Grand Canal should not be used as a flood relief route.</p>	<p>Numerous policies within the Draft Plan give significant protection to the Grand Canal and associated biodiversity corridors, namely the amendment proposed to Policy LHA22 Protection of the Grand Canal along with increased protection of species and habitats contained within Policy LHA19 Flora and Fauna. These policies will be paramount when creating a masterplan for the 12th Lock as set out in PA188. Recommendation: No change.</p>

<p>(Finnstown Action Group) 12th Lock masterplan:- Amend the first bullet point to exclude both references to the Grand Canal. Include a caveat to the second bullet point to ensure the impacts from any restoration work etc are not allowed to impact on the pNHA or the protected habitats and species of the Grand Canal.</p> <p>(An Taisce) 12th Lock masterplan: Whilst we agree with the creation of a masterplan to dictate the development of an area, we note that there are a number of worrying phrases in this SLO such as: community gain. Concerns include already zoned land, pNHA, and reference to the 12th Lock should be removed.</p> <p>(Environmental Protection Agency) Attention drawn to the requirements under the SEA and Habitats Directives with regard to screening for significant environmental effects.</p>	<p>Comment regarding Appropriate Assessment All plans and projects will be required to be screened for possible impact on Natura 2000 sites. SDCC undertakes to fulfil obligations under Article 6(3) of the Habitats Directive as listed in PA144 (LHA9).</p> <p>Recommendation: No change.</p>
<p>PA195 New SLO Liffey Valley Traffic</p> <p>(National Roads Association) Liffey Valley Town Centre Traffic. Request consultation with and approval of NRA prior to Council proposing any measures affecting N4 National Primary Route.</p>	<p>Noted.</p>
<p>PA198 New SLO Dodder Linear Park</p> <p>(Keep Ireland Open) Dodder liner park: That the Action Plan be completed within the lifetime of the Plan.</p>	<p>It is acknowledged that the creation and implementation of an action plan for this area would assist in the protection of the Dodder as a biodiversity resource.</p> <p>Recommendation: No change.</p>
<p>PA200 New SLO Aylmer nursing home</p> <p>(South Dublin Conservation Society) Commons Little, Nursing Home- Proposal located in a Green Belt and nursing homes are only open for consideration in an existing premises under this zoning</p>	<p>The environmental assessment noted that the proposed SLO may result in negative environmental impacts on car based emissions and car dependency.</p> <p>Recommendation. That the proposed amendment PA200 be omitted in order to prevent potential for negative impacts.</p>
<p>PA203 New SLO Flooding</p> <p>(Resource Property Investment Fund Plc.) Areas of Flooding Potential: Request for an amendment of PA203 to add the following sentence at the end of the proposed new SLO: Applications for minor development, such as small extensions to houses, and most changes of use of existing buildings and or</p>	<p>PA203 relates to the assessment of planning applications in areas of flooding potential. The amendment requested is contained within the Flood Risk Management Guidelines and will be applied as part of any assessment of relevant planning applications. It is not considered necessary to insert this wording</p>

<p>extensions and additions to existing commercial and industrial enterprises, are unlikely to raise significant flooding issues, and will therefore be acceptable in principle subject to appropriate flood risk assessment and mitigation, where necessary.</p> <p>(Environmental Protection Agency) Reference to Dodder CFRAMS noted, consideration should be given to amending the first paragraph as follows "...floodplain maps are to be integrated into any planning decision, where appropriate along with..."</p>	<p>into the relevant SLO. Recommendation: No change.</p> <p>This amendment would strengthen the interpretation of the policy. Recommendation: Amend to:- The areas of flooding potential as indicated in the Dodder Catchment Flood Risk Assessment Management Study (CFRAMS) and the OPW "alluvial soils" floodplain maps are to be taken into account integrated into the decision process, where appropriate along with along with the requirements of Section 5 of The Planning System and Flood Risk Management Guidelines (November 2009) when assessing planning applications, with a view to restricting or, if necessary, refusing development proposals within such areas in order to avoid flooding events.</p>
<p>PA204 New SLO Grand Canal Hazelhatch</p> <p>(Keep Ireland Open) Grand Canal Hazelhatch: should include reference to cycleways.</p> <p>(Finnstown Action Group) Objects to the inclusion of the SLO as it would result in major damage of the canal.</p>	<p>Agreed. Such a cyclepath should not impact negatively on the landscape, heritage character or biodiversity of the canal. Recommendation. Amend PA204 to state 'location for water based activities, and walking and cycling trails...'</p>
<p>PA211 Schedule 4 Casement Aero.</p> <p>(Dept of Defence) Casement Aerodrome Baldonnell. Item 2- it is the policy of the Dept. of Defence that the distance within which no development is allowed on lands lying under the approaches to runway 05/23 is 1,350 metres- the Dept. will continue to ensure that this is enforced.</p> <p>(SIAC) Casement Aerodrome Baldonnell:- Requests clarification that the motions adopted by the members of the Council, which intended that development would be able to proceed on zoned lands within the security zone, subject to conforming with appropriate security arrangement for such locations are reflected in the plan.</p> <p>(SIAC) Casement Aerodrome Baldonnell:- The amendment to this paragraph allows for some limited development to be permitted in principle in the red zoned. Therefore the phrase that states "within which no</p>	<p>It was noted within an assessment of the Councillors Motions (April 2010) at the Draft Development Plan stage that adoption of motions to amend the security consultation zone and restriction area at Casement Aerodrome could have significant effects on river systems, such as the Camac (an already stressed and polluted river system) and biodiversity corridors, but these were likely to be mitigated.</p> <p>However, significant additional impacts on the landscape and habitats, which are unlikely to be mitigated, would be envisaged if the proposed amendments to the security zones and runway restrictions were to be adopted along with a subsequent rezoning for the surrounding lands from 'B' agriculture, to industrial zoned lands. Recommendation: No change.</p>

development is allowed" should be amended to reflect this change.

(SIAC) Casement Aerodrome Baldonnell:-
Requests that the criteria for determining the acceptability of development within the red zones should be in accordance with national and international best practice, as applied at Dublin, Cork and Shannon airports and that Schedule 4 should be amended to reflect this.

(SIAC) Casement Aerodrome Baldonnell:-
Requests the omission of any reference to 'restricted area' and any reference to an 'objection to planning permission'

(SIAC) Casement Aerodrome Baldonnell:-
Contents that proposed amendments made to Schedule 4 are made up of incomplete parts of two different motions (Motions 239 and 242) and therefore 'dilutes' the thrust of the motions adopted. Requests that the schedule be amended to reflect the motions adopted by the members of the Council; such as "that development of these lands is now permitted in principle, subject to conditions on scheme design addressing security."

(SIAC) Casement Aerodrome Baldonnell:-
Believes that the paragraph "Casement Aerodrome is the only secure military aerodrome in the State.....the limitation of development in that area and in close proximity to the aerodrome boundary." Is in conflict with the agreed motions 239 and 242 and should be amended.

(SIAC) Casement Aerodrome Baldonnell:-
The conclusion paragraph of Schedule 4 refers to prohibition and restriction of development. Request for amendments to be made to this paragraph to reflect the decision made by the Council members.

(South Dublin Chamber of Commerce)
Casement Aerodrome Baldonnell: The South Dublin Chamber welcomes the positive changes made to the security arrangements at Casement Aerodrome, Baldonnell, brought about by the Amendment Ref. No. PA110 and the Amendment Ref. No. PA211. believe that implementation of a Security Consultation Area around and outside the aerodrome boundary will be effective and indeed that it will improve on the current arrangements in place at Casement Aerodrome.

<p>(South Dublin Chamber of Commerce) Casement Aerodrome Baldonnell: Concerned though that there is the possibility for interpretations other than those which the changes to the development sought to clarify and to this end we would urge that the development plan provide clarity and remove ambiguity in areas -For example, there are some amendments required to the Development Plan text to remove some outdated references in regard to the Red Zones, carried over from the previous Development Plan text.</p> <p>(South Dublin Chamber of Commerce) Casement Aerodrome Baldonnell: The Chamber believes that following the Council Motions debated in relation to Casement Aerodrome, there was a clear understanding that the intended consequence of passing the Motions was that when development was proposed within the security zone, on zoned lands, that development would be able to proceed subject to conforming with appropriate security arrangements for such locations; being largely matters that need careful design input to a scheme. This clarity is needed to prevent future misunderstanding or misinterpretation.</p> <p>(Finnstown Action Group) Casement Aerodrome:- Objects to the change in height restriction in the vicinity of Casement and other changes that facilitate the rezoning of land along the Naas Road and request that these amendments be deleted.</p> <p>(RAID) Amend the proposed amendment to section 3.2.22 to replace the corresponding sentence with the following: However, within the 'red' zones', some development is permissible whereby the development could not increase the number of people living at the property to the approval of the Department of Defence.</p>	<p>Removal of the restrictions applied to the lands around Casement Aerodrome have potential to negatively impact on biodiversity, landscape, habitats, flooding and watercourses, however, these effects are likely to be mitigated, as long as the surrounding lands remain in agricultural use. However, significant additional impacts on the landscape and habitats, which are unlikely to be mitigated, would be envisaged if the proposed amendments to the security zones and runway restrictions were to be adopted along with a subsequent rezoning for the surrounding lands from 'B' agriculture, to industrial zoned lands.</p> <p>Recommendation. No change</p>
<p>PA218</p>	

<p>(Electrolux) In the interest of clarity, requests that isochrones indicating which sites fall within the consultation distances of the Seveso sites are transposed onto the amended draft development plan maps. (It is unclear whether the proposed consultation distances should be measured from the perimeter or from centre of the sites.)</p>	<p>The Naas Road Masterplan contains greater levels of detail relating to the consultation distances. The detail in this document coupled with the consultation distances in the Draft Plan are considered sufficient. Recommendation: No change.</p>
<p>PA227 Tootenhill Rezoning</p> <p>(South Dublin Conservation Society) Rezone land at Tootenhill, Rathcoole- Object to amendment on grounds that Environmental Report states that this is a flood plain and rezoning would be in contradiction with other policies and objectives in the Draft Plan.</p> <p>(Environmental Protection Agency) (PA125, PA163, PA164, PA227 and PA228). Obligation to ensure the Proposed Amendments do not conflict with Policies/Objectives in the Draft Regional Planning Guidelines for Guidelines for the greater Dublin Area 2010-2022.</p>	<p>Agreed. The rezoning would impact on the Griffeen River Flood plain, biodiversity corridor, landscape and increase car dependency and would be likely to have significant residual negative impacts.</p> <p>Recommendation. Remove the proposed amendment PA227 in order to prevent potential for significant residual negative impacts.</p> <p>PA227 Tootenhill, Rezoning has been identified in the SEA assessment as being likely to result in significant negative residual impacts. These proposed amendments also appear to conflict with the strategic policies contained within the Regional Planning Guidelines (RPGs) for the Greater Dublin Area 2010-2022, as made in June 2010 i.e. Strategic Policy SP1 relating to sustainable residential development and/or Strategic Policy EP2 relating to sustainable economic growth and reduced volumes of commuting. Recommendation: It is considered that the proposed amendment/rezoning PA227 be omitted in order to prevent significant negative residual impacts.</p>
<p>PA228 N7 EP2 rezoning</p> <p>(An Taisce) N7 EP2 rezoning: Strongly disagree with plans to zone the serviced and accessible lands along the northern side of the N7 Naas Road, between Baldonnell Business Park, the Newcastle Road, the southern property boundary adjacent to runway 05/23 of Casement Aerodrome and the public safety zone to the south-west of runway 05/23 as Objective EP2. Concern in relation to the impact on policy T19, and the Camac River.</p> <p>(Finnstown Action Group) Objects to the extent of new zoning of industrial land on the Naas Road. Development lands beyond a 6 year horizon should not be zoned for development.</p>	<p>Agreed. The assessment contained within Addendum II indicates in the strongest possible terms, that this EP2 rezoning would undermine the development strategy of the Development Plan, create significant landscape, biodiversity corridor, transport, river (Camac) and flooding impacts as well as increasing car usage, facilitating urban sprawl. This would have significant residual negative impacts.</p> <p>Recommendation: That the proposed rezoning PA228 be omitted in order to prevent significant negative residual impacts.</p>

<p>(South Dublin Chamber of Commerce) Support this zoning.</p> <p>(SIAC) Request that the legend be amended to refer to 'Security Zone Restrictions' rather than 'Security Consultation Zone'.</p> <p>(SIAC) Seeks clarification that the dark outline indicating Public Safety Zones shown on the digital copy maps, in the shape of a PSZ, is an indication only of the space within which the amendment has been made.</p> <p>(Environmental Protection Agency) Obligation to ensure the Proposed Amendments do not conflict with Policies/Objectives in the Draft Regional Planning Guidelines for Guidelines for the greater Dublin Area 2010-2022.</p>	<p>PA228 land rezoning along the northern side of the N7 Naas Road has been identified in the SEA assessment as being likely to result in significant negative residual impacts. The proposed amendments also appear to conflict with the strategic policies contained within the Regional Planning Guidelines (RPGs) for the Greater Dublin Area 2010-2022, as made in June 2010 i.e. Strategic Policy EP2 relating to sustainable economic growth and reduced volumes of commuting. Recommendation: It is considered that the proposed amendment/rezoning PA228 be omitted in order to prevent significant negative residual impacts.</p>
<p>SEA Issues</p> <p>(Liffey Valley Park Alliance) Queries use of national plans within the SEA process, given the lack of conformance of the national plans to SEA.</p> <p>(Liffey Valley Park Alliance) Comments in relation to proposals for abstraction of water from the Liffey valley by Fingal County Council (transboundary effects) and flood risk management in terms of implementation of the Liffey CFRAMS, the Liffey as a and the full implementation of ERBD water quality standards.</p> <p>(An Taisce) Concern regarding proposals for water abstraction from the Liffey</p> <p>(Finnstown Action Group) Claim that there are major gaps in the SEA:- lack of Biodiversity Plan, an incomplete Landscape Character Assessment and a lack of</p>	<p>The Draft Plan and SEA must be informed by national and regional plans. The Strategic Environmental Objective (SEOs) in the Environmental Report are based in part on the National Plans and Guidelines. Recommendation: No change</p> <p>The application for the expansion of the treatment plant was granted permission in August 2006, prior to the beginning of the Development Plan review process. There are several policies within the Draft Plan relating to the protection and management of the River Liffey, including the creation of a specific zoning for the Liffey Valley which will protect this important landscape character area, LHA3 – 7 pertaining to the Liffey Valley SAAO and Liffey Valley Park, and policy LHA13 Development within Liffey Valley, High Amenity or Mountain Areas. Recommendation: No change</p> <p>These information gaps are acknowledged in the Environmental Report and were inserted into the Draft Development Plan as policies to be completed urgently as a result.</p>

information regarding floodplains and flood risk areas.

(An Taisce) SEA Issues. The submission states that there is little mention of the Metro West plans yet the route will, almost certainly cross the Liffey Valley Special Amenity Area Order (SAAO) and we note that Council Policies **LHA4 -LHA7** seek to protect the Valley.

(An Taisce) The submission questions the depth and quality of the environmental report.

(An Taisce) In the last phase of the plan, every occurrence of the phrase "have regard to" has been changed to read "as far as is practicable, be consistent with" however the commentary in the environmental report is almost consistently: "The Proposed Amendment would not change the assessment provided in the Environmental Report."

(An Taisce) Species listed under Annex II and Annex IV are strictly protected wherever they occur, and the conditions under which a development proposal can be given derogation to disturb them is strictly limited. Given the fact that species threat action

It is acknowledged that the route of Metro West is proposed to cross the Liffey Valley. This will be noted in the Environmental Report, as amended upon subsequent adoption of the Draft Development Plan. Metro West is part of the NTA strategy and an EIS will be required. **Recommendation:** No change.

The SEA Environmental Report complies with the requirements of the SEA Directive (Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment) as transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No.) 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004).

The Strategic Environmental Assessment of the Draft Plan was undertaken in tandem with the Development Plan process. The Implementation of SEA Directive document published by the Department of the Environment, Heritage and Local Government (DoEHLG) was consulted extensively as were the required statutory bodies. None of the submissions from the statutory bodies, specifically the EPA or DoEHLG, noted any irregularities regarding the Strategic Environmental Assessment. **Recommendation:** No change.

The different phrasing of the responses pertains to a legal decision relating to the use of the term "have regard to". It was considered that the amendment would not affect the environmental assessment provided in the initial Environmental Report **Recommendation:** No change.

The Environmental Report and Draft Plan note the requirements of the Habitats Directive as well as Irish Law relating to protected species. The protection of biodiversity has informed and shaped the Development Plan process, and resulted in

plans have been required for Annex IV species such as otters, more specific protection should be specified. The plan and associated environmental report is weak in this regard.

(An Taisce) As part of an SEA there should be detailed in the plan a list of all areas in the county that contain Red Book species, and plants subject to a Floral Protection Order

(An Taisce) It is not clear in the SEA how the Liffey CFRAMS is going to be addressed. This area needs to be clarified

(An Taisce) We do not believe that the Liffey's status as a salmonid river has been considered adequately in the Plan or in the Strategic Environmental Appraisals

(Environmental Protection Agency) Consideration should be given ensuring any proposed development, which may arise out of the Proposed Amendments take into account the findings of the Flood Risk Assessments (including Dodder CFRAMS) conducted for the County.

(Environmental Protection Agency) Current and future land zoning and development should have regard to the finding of current and future flood risk

many policies specifically tailored towards the protection and enhancement of conditions and habitats for protected species. These policies include **LHA8** SACs and pNHAs, **LHA9** Impacts on Natura 200 Sites, **LHA15** Heritage and Biodiversity Plan, **LHA17** Trees and Woodlands, **LHA18** Hedgerows, **LHA19** Flora and Fauna, which provides protection for EU and Nationally protected species, **LHA20** River and Stream Management, **LHA21** Watercourses and **LHA22** Protection of the Grand Canal. **Recommendation:** No change.

The SEA is not meant to be utilised as a detailed biodiversity database. The baseline section of the report notes areas of significance, along with issues which affect biodiversity through the county, as well as areas where a lack of information constrained assessment. It is contended that **LHA15** Heritage and Biodiversity Plan, which the SEA noted was urgently required (Env. Rep. Section 3.3.8 final paragraph) would assist in identifying local areas of biodiversity value. **Recommendation:** No change.

The Draft Plan (section 2.3.25) specifically notes that any recommendations arising from CFRAMS for the county will be incorporated into the development management process as they become available. The Liffey CFRAMS is at an early stage of development at present (July 2010) **Recommendation:** No change.

The amendment to section 2.3.9 of the Draft Plan relates specifically to the restriction of development along salmonid rivers, including the River Liffey. This was informed by the submission to the Draft Development Plan by the ERBD and recommended for inclusion through the SEA process. **Recommendation:** No change.

In addition to the numerous policies and objectives within the Draft Plan relating to flooding and flood risk management, a comprehensive Specific local objective (SLO 203) requiring flood risk assessment on specific enterprise lands (SLO 36 and SLO 58); and in areas identified through the Dodder CFRAMS and alluvial soils map will be required to be taken into account - along with the requirements of the *Planning System and Flood Risk Management Guidelines (November 2009)*. **Recommendation:** No

<p>assessment studies to identify vulnerable areas and promote appropriate land use.</p> <p>(Environmental Protection Agency) Comments regarding need to clarify how the Appropriate Assessment screening has taken into account potential 'in-combination' effects and cumulative effects as a result of a number of Proposed Amendments, as identified in the Environmental Report</p>	<p>change.</p> <p>Issue relating to Appropriate Assessment All amendments were screened for likely significant environmental effects, including cumulative effects. A considerable number of the amendments proposed to the draft CDP will lead to significant increases in the protection that will be afforded to habitats, biodiversity, water quality, landscape, and heritage. As identified by the SEA process, a smaller number of agreed proposed amendments have the potential in general to negatively impact on these elements, and in particular, on the Natura 2000 network. The individual, cumulative, and in-combination effects of these latter amendments were assessed and judged against the overall positive and strong environmental policies in the draft CDP, including the requirement to subject any plan or project to screening for Appropriate Assessment.</p> <p>Recommendation: No change.</p>
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