



Athlone Town  
Development Plan 2014-2020

Volume 6  
SEA Statement

## **SECTION 1 INTRODUCTION**

### **1.1 Purpose of Report**

This report is the Strategic Environmental Assessment (SEA) Statement of Athlone Town Development 2014-2020. The main purpose of the SEA Statement is to indicate how environmental considerations, the views of consultees and the recommendations of the Environmental Report have been incorporated in the decision making process in the formulation of the Athlone Town Development 2014-2020.

### **1.2 Legislative Context**

The requirement to carry out a Strategic Environmental Assessment stems from the Strategic Environmental Assessment Directive (2001/42/EC) which states:

‘The objective of this directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans.....with a view to promoting sustainable development....’

The Directive was introduced into Irish Law in 2004, through the European Communities (Environmental Assessment of Certain Plans & Programmes) Regulations 2004, S.I. No. 435 of 2004 and the Planning and Development (Strategic Environmental Assessment) Regulations 2004, S.I. No. 436 of 2004.

Article 9 of the SEA Directive (2001/42/EC) provides that the environmental authorities and the public must be provided with an SEA Statement as soon as is practical after a plan is adopted. The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the plan,
- b) how
  - the environmental report,
  - submissions and observations made on the Draft Plan and Environmental Report, and
  - any transboundary consultations have been taken into account during the preparation of the plan.
- c) the reasons for choosing the plan, as adopted, in the light of the other reasonable alternatives and
- d) the measures selected to monitor the significant environmental effects of implementation of the plan.

### **1.3 Implications of SEA for the Plan Making Process**

In line with the legislation, the Athlone Town Development Plan 2014-2020 was required to undergo Strategic Environmental Assessment (SEA). An Environmental Report was prepared in parallel with the production of the Draft Town Development Plan. The Environmental Report was submitted to the Elected Members of the Athlone Town Council and Westmeath County Council alongside the Draft Plan. The Environmental Report was updated by way of an Addendum to take account of material changes proposed to be made in the Draft. On adoption of the Town Plan by elected members on 21<sup>st</sup> January 2014, the Environmental Report and Addendum are presented in a single document alongside the adopted Town Plan, which is available for public inspection. The purpose of the

Environmental Report was to provide an understanding of the likely environmental consequences of decisions regarding the future sustainable development of the Town.

Submissions on the Environmental Report and the Town Development Plan 2014-2020 were evaluated at each stage of the process in order to ascertain any further environmental consequences to those already identified. These evaluations were included within the Managers Reports to Town & County Council Members on the proposed amendments to the Plan. The Elected Members were required by legislation to take into account the Environmental Report before the adoption of the Plan.

## **SECTION 2 HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE PLAN**

Environmental considerations were integrated into the Development Plan process at a number of stages in the SEA i.e. the Scoping stage, at the Environmental Report stage and following the submissions and observations from the Environmental Authorities and the public.

### **2.1 Scoping Report**

A Scoping Issues paper was sent to the statutory Environmental Authorities (the Environmental Protection Agency, the Department of the Environment, Heritage and Local Government and the Department of Communications, Marine and Natural Resources) in which noted the environmental issues to be considered, the sources of such information, preliminary environmental objectives and indicators and potential development alternatives. The Environmental Authority issued detailed responses to the Scoping Issues paper. The issues that arose generally related to water and waste water, environmental carrying capacity and the management and potential effects of the development of the County on Natura 2000 site and also noted specific species, areas and sites of concern within the County. The submissions also recommended updated sources of information for use in the Environmental Report.

These issues raised and associated responses were taken into account during the preparation of the Environmental Report. The issues and associated responses are dealt with in greater detail in Section 4 of this document.

### **2.2 Environmental Report**

The Environment Report is prepared alongside the Draft Development Plan and investigates, describes and evaluates the effects of implementing the Development Plan on the receiving environment. The report also assesses and identifies development alternatives for the Town and identifies the most sustainable strategy. The intention is that the Development Plan should adhere to the preferred development strategy as far as possible.

Overall, the preparation of the Environmental Report influenced the formulation of the Development Plan as follows;

1. It raised the awareness of the existing level of environmental information in the Plan Area and the County and also EU and National legislation governing the environment.
2. It facilitated translating the Baseline environmental information to a GIS basis and in deriving an Environmental Sensitivity Map
3. It introduced seventeen Strategic Environmental Objectives (SEOs) that formed the basis for creating Environmental Receptor Targets and Indicators to monitor the environmental impacts of implementing the Development Plan



4. It demonstrated *Consolidation of urban core and plan lead expansion of inner edge and environs* as the best development scenario using assessments of the SEOs and the Environmental Sensitivity Analysis.
5. It provided a transparent assessment of each proposed policy and objective which allowed further fine-tuning to reduce negative environmental impacts.

The detail of these influences is expanded on below.

**2.2.1 Baseline:** The Environmental Report contains a range of baseline information in the Athlone Town Plan Area on key environmental headings such as

1. Population
2. Biodiversity (Flora and Fauna)
3. Geology/ Soil
4. Water Resources
5. Air and Climate Factors
6. Waste Management
7. Material Assets
8. Cultural Heritage
9. Inter-relationships between the above environmental categories.

## **2.2.2 Mapping of Environmental Sensitivities**

Geographical Information System (GIS) software was used in order to assess a number of environmental sensitivities and map them in layers; (eg. Ground water vulnerability, Habitats, Soils, flood risk). The process assisted in the evaluation of policies, local objectives and in association with the assessment of alternative development scenarios described in the Environmental Report.

## **2.2.3 Key Environmental Issues Identified:**

The key environmental issues in the Athlone Town Plan area were identified in the Environmental Report as

1. Gateway Status and growth of the Town and implications of prioritised growth for Environmental Resources.
2. The required physical and structural infrastructure to meet the increased demand in population including impacts on habitats and species of ecological importance.
3. Planned future capacity of both water and waste water treatment and constraints which arise in meeting objectives of the Plan.
4. Flood risk within the Plan area affecting Greenfield, Brownfield and Opportunity Sites.
5. Proposed Loughandonning link road which follows the River AI Flood plain and proposed road from Blyry enterprise and employment area.
6. The impacts of increased recreational access to the River Shannon and Lough Ree for transport and proposed walkways and extension to amenity areas affecting SAC/SPAs.
7. Footbridge over the River Shannon
8. The zoning of additional lands to the west of the Town.
9. Proximity of residential lands at Hillquarter to SAC and floodplain.
10. Impact on human health and climate change arising from increased car usage and unsustainable travel patterns.
11. Uncoordinated development and the need for joint plan for greater Athlone Area including that area within County Roscommon.

12. The need for Environmental Monitoring Programme.

#### **2.2.4 Strategic Environment Objectives (SEO)**

The environmental protection objectives for the Plan have been generated from European, National and Regional Policy and Guidance. The SEOs are measures against which the environmental effects of the Town Development Plan (CDP) can be tested in order to help identify areas in which significant adverse impacts are likely to occur, if unmitigated. They were used as a tool to cross check the policies of the Plan in order to maximise the environmental sustainability of the Plan. The SEOs are also linked to indicators and targets which facilitate monitoring of the implementation of the Town Development Plan. The full list of SEO's, indicators and monitoring proposals and targets are contained in Section 5 of the Environmental Report.

#### **2.2.5 Environment Assessment:**

The policies and objectives of the Development Plan were assessed against the SEOs at a number of stages during the process. This allowed for early identification and mitigation of environmental conflicts. This resulted in amendments to existing policies, the addition of environmentally beneficial policies and the removal of policies with significant negative affects. Assessment of each Development Plan policy was also undertaken and these are contained in the Appendix to the Environmental Report.

### **Section 3 Mitigation**

Suggested alternatives, mitigation measures, offsetting, etc., to the potential identified significant effects were raised for discussion, and amendments to the Plan were proposed in the Environmental Report where required.

#### **3.1 Summary from the Environmental Report of likely Significant Effects of Implementing the Plan on the Environment and Mitigation Measures proposed to prevent, reduce or offset.**

Depending on the level of significance, which was determined based on the scale and cumulative nature of the potential impact and measures to mitigate against significant negative environmental effects have been provided for. Those affects with a higher level of significance, a recommendation was made to remove or alter the policy so as to prevent or reduce the impact if possible.

#### **Gateway Status**

Several policies within the Plan promote the growth of the town to achieve its gateway status. Large scale population and economic growth will require the development of previously undeveloped Greenfield lands for the provision of housing, community, health care and amenity facilities, resulting in a loss of biodiversity, flora, fauna, hedgerows and potential habitats.

The redevelopment of 16 hectares of Greenfield lands at Hillquarter would impact on the biodiversity of this area, given its proximity to the SAC and SPA, during construction, use or during a flood event. Part of these land lie within the identified floodplain. Negative impacts on biodiversity and designated sites, particularly along rivers and around lakes, can occur as a result of development such as walking routes, cycleways, seating, lighting and loss of riparian zone.

Policies and objectives promoting the potential for significant environmental impacts on biodiversity Flora and Fauna of Local National and International importance, as set out in the submission from NPWS and in the SEA Matrices.

### **Tourism Development**

The policy to actively promote tourism along the River Shannon and Lough Ree would place a threat on the biodiversity of these areas. A new footbridge is proposed along the Shannon to promote the Waterfront which could impact on the rivers biodiversity and archaeology.

### **Economic Development**

The draft plan proposes objectives for the promotion of the Strategic Gateway Zone(SGZ) and Strategic Development Zone (SDZ). There is no identified area proposed within the Plan for the SDZ and its impact cannot be assessed. Given the nature of an SDZ its location could impact on the biodiversity of the area. The cumulative impacts of a SGZ and SDZ in terms of traffic could be significant, depending on the future location of the SDZ.

### **Transport**

Policy P-PT7 proposes the reserving of corridors for the extension of the roads to support and promote public transport and a further objective encourages the facilitation of new road links, a new maintenance bus garage, and park and ride facilities in the town centre. These routes and locations have not been identified on the Plan. Depending on the location of these routes there could be the potential to have a significant impact on biodiversity.

Future residential developments within the Plan area are to be on a sequential basis to reinforce public transport usage and make it economically viable.

Policies have been included within the plan to improve public transport service provision which will improve the need to travel by car to rural enterprise areas. However the location of these areas needs to be identified to make it financially viable for services to access such areas.

Any SDZ to the east of the town would require the reopening/reuse of the existing Mullingar to Athlone railway line to service the development.

### **Proposed Loughandonning Link Road**

The route follows the River AI corridor which is a river with protected Lamprey eel and subject to flooding. The ecological impacts of this road on the River AI need to be assessed before a route is determined.

### **River Transport**

Several policies and objectives within the Plan promote the use of the River Shannon and Lough Ree for transport. There is the potential to impact on the flora and fauna of the river and the river bank and to increase the spread of alien species.

### **Measures to Prevent, Reduce or offset**

The spread of alien species such as Japanese Knotweed and Hogweed can be damaging to local biodiversity and a policy is required to mitigate against the accidental introduction of such species in the use of transport along the river.

The development of walkways along the river would need to be assessed for the impacts on the ecology before the walkways are identified.

The plan should be amended to contain an objective to carry out an appropriate level of analysis to identify specific locations/areas and/or specific uses for rural economic/tourism development to which a policy of the type proposed would apply thereby allowing assessment of location specific sensitivities and/or development specific issues.

#### **Scale of Population Growth**

Several masterplans have been developed for the town and its environs which would exceed the population targets as set out in the Regional Guidelines. These plans should be implemented on a phased basis to align with population targets.

There is no requirement to further zone outside the town boundary at Hillquarter, or lands to the west of the Shannon.

#### **Measures to Prevent, Reduce or offset**

Revise policy to development being on a sequential basis of the town with the development of vacant, derelict, underutilised sites in close proximity to public transport given priority such as the identified town centre sites within the draft plan. The increase in population will impact on the existing infrastructure and on water quality. Remove zoning at Hillquarter.

#### **Athlone Waste Water Treatment Capacity to support further development**

The Athlone WWTP AER submission 2011 stated the organic capacity of the existing Waste Water treatment Plant is 30,000 p.e. The organic loading at the WWTP in 2011 was approximately 34,694 p.e. Treated effluent is discharged into the River Shannon which has a water quality status as moderate. The current exceeding organic capacity of the WWTP is 2,632 p.e. Other than in exceptional cases it is considered that policy and objectives for further development and consequent loading of the existing WWTP are limited to the capacity remaining between the design capacity P.E and the estimated average loadings.

#### **Measures to Prevent, Reduce or offset**

##### **Waste Water Treatment Capacity:**

##### **Option 1:**

Identify available capacity in Athlone WWTP to accommodate further development and ensure that the proposed development does not exceed this capacity.

##### **Option 2:**

Remove all land use zoning objectives that on implementation have potential to result in increased loadings to the WWTP where there is no reliable prospect of the capacity being provided.

The preparation of a water services strategic plan as set out in S. 36 of the Water Services Act 2007 would assist greatly in the resolution of the various considerations regarding spatial policy in this regard.

#### **Groundwater**

Groundwater plays an essential role in the hydrological cycle and is critical for maintaining river flows and surface water ecosystems such as wetlands. The importance of protecting the groundwater contribution to the River Shannon as the main drinking water sources in the county

cannot be overstated. Trends in water quality in recent years have been that the condition of Lough Ree has deteriorated and is at 'significant risk' from diffuse sources.

### **Flood Risk**

The Flood Risk Map for Athlone identifies a significant area within the town at risk of flooding, particularly along the River Shannon and River AI. Several brownfield opportunity sites have been identified in the town centre are located within the identified floodplain. Part of an area indicated for residential zoning within the town council boundary is within the area identified as liable to flooding. A submission from the EPA makes reference to the fact that the Athlone WWTP and Golden Island Pumping Station are located within an area at risk of flooding.

The proposed strategic Loughandonning link road is located within the catchment of the River AI and is affected by an area identified as subject to flooding. There is one recorded recurring flood event within the Creggan area, namely on lands to the north of the area within the catchment of the AI River. In order to alleviate the risk of flooding at this location, a tract of land extending to 17 ha in area has been reserved free from development in the Creggan plan.

Objective O-OC2 seeks to designate further areas of the town and individual sites to the west of the town. This area is subject to pluvial flooding and should be removed from the plan.

The area identified as Bellaugh in the zoning map for a framework plan has experienced pluvial flooding.

### **Measures to Prevent, Reduce or offset**

A specific Policy should be included to provide for/promote appropriate flood risk assessments to be undertaken, where development(s) and zoning are being proposed in the Plan area where there is risk of flooding.

The Flood Risk Assessment needs to have regard to those areas zoned within the Plan which will be impacted by flooding.

#### **Option 1:**

Remove land use zoning objectives where a flood risk has been identified.

#### **Option 2:**

Carry out a SFRA and justification test in accordance with The Planning System and Flood Risk Management, issued under section 28 of the Planning and Development Act 2000 as amended.

Regard to the Shannon CFRAMS currently undergoing SEA has not been taken into account in the Flood Risk assessment.

The plan needs to highlight the need to incorporate the use of SUDS (Sustainable Urban Drainage Systems) into any approach to managing the AI River. Future development proposals within the vicinity of the AI River shall be subject to Flood Risk Assessment.

### **Archaeological and Cultural Heritage**

The central core of the town lies within an Archaeological Priority Zone and places constraints on the development of the town centre given its status as a Gateway Town. The accumulative development of sites within the town centre has the potential to impact upon the cultural heritage of the Plan area.



The proposed strategic road link indicated on the Transportation Map from Blyry Industrial Estate would be positioned close to a protected national monument WMO29-024. This indicative road would need to be removed from the plan until it is assessed or be subject to archaeological assessment prior to route finalisation.

**Measures to Prevent, Reduce or offset**

The proposed pedestrian footbridge over the Shannon would impact on the archaeology of the River and alternatives such as attaching a footbridge to the existing bridges along the river subject to impact on architectural heritage would be a more viable option.

Policy needs to include the redevelopment of brownfield sites as identified in the opportunity sites within the town centre to be subject to archaeological mitigation measures being applied.

Remove proposed strategic road link as indicated on the Transportation Map until impact on archaeology is assessed or require archaeological assessment prior to route finalisation.

## Section 4 SUBMISSIONS AND OBSERVATIONS

### 4.1 Introduction

The following section details the significant issues which were raised in submissions and observations made to the Draft Plan and Environmental Report.

**Submission made by:** EPA (Environmental Protection Agency) to the Draft Plan

**Date Received:** 11<sup>th</sup> April 2013

#### Summary of points raised in Submission of the EPA:

##### 1. Section 1: Development Plan

The comments below relate to the Plan; the comments and suggestions in this section are put forward for consideration and mainly relate to the key stages and outputs of the SEA Process.

- a. Consideration should be given to the future preparation of a joint plan for the plan area of Monksland/Bellanamullia that is within the jurisdiction of Roscommon Co. Council (and included in an LAP) and the environs of Athlone.
- b. Consideration should be given to including further detail in Section 1.7 – *Environmental Considerations* on the influence of SEA (and AA and FRA) on the Plan, including assessment of alternative development scenarios, alterations to policies/objectives, inclusion of additional policies and objectives etc.
- c. Section 1.10 – *Monitoring, Review and Implementation* should include a commitment to implementing the environmental monitoring programme as set out in the Environmental Report. (Including frequency of monitoring and department responsible or same).

Response 1a-b. Noted

1c. Section 1.10 of the Plan has been amended to include a commitment to establish a monitoring report in accordance with recommendations made in the SEA Environmental Report. This monitoring regime shall also embrace the part of the urban core within Co. Roscommon.

##### 2. Chapter 2 – Core Strategy

- a. Strategic Aim (i) should be amended as follows: '*Prioritising **sustainable** development of the Gateway.*' In addition, *Strategic Aims (vi) and (vii) should refer to **sustainable economic development** and **sustainable** development respectively*'.
- b. Section 2.5 – *Spatial Planning Framework in the Town* should be clarified regarding the relationship between the Athlone TDP and the 5 LAPs (Curragh, Lissywollen, Cornamaddy, Cornamagh, Lissywollen South and Creggan). It should be ensured that zoning for residential development with Athlone Town (including LAP zonings) is not in conflict with the target populations set out in the Midlands Regional Planning Guidelines.
- c. Section 2.7 – *Housing Requirement* should set out the number of housing units required up to 2020 and should clarify whether or not the unfinished housing estates and vacancy rates have been taken into account in the calculation of the amount of land required up to 2020 (as set out in Fig. 2.3 – *Population Targets and Housing Land Requirements*).

- d. Section 2.14 – (*Population Estimates and Projections to Meet RPG Targets*) should clarify whether the calculation of the required increase in population up to 2020 (8482 persons) has taken account of the 2011 census data.
- e. **Policy P-CS9** should be amended as follows; '*To restrict development in areas at risk of flooding in accordance with the Planning **System** and Flood Risk **Management** Guidelines for Planning Authorities (DEHLG/OPW, 2009)*'.

#### Response

- 2a. Strategic Aims I, VI and VII in Section 2.3 have been amended accordingly.
- 2b. Section 2.6 of the Plan has been amended to include a calculation of the quantum of lands zoned for residential development in each of the Local Area Plans in the town.
- 2c. Section 2.8 of the plan has been amended to include the number of housing units required up to 2020.
- d. The 2011 census data has been taken into consideration in the drafting of Section 2.14 of the Plan.
- e. Policy P-CS9 has been amended in this regard.

### 3. Chapter 3 – Housing

- a. Section 3.3 – *Population, Housing Requirements & Land Availability*; there would be merits in including a zoning map in the interests of clarity.
- b. Clarification should be provided regarding the amount of lands zoned for development and whether a phasing strategy has been applied for lands zoned residential.
- c. Clarification should be provided whether any lands have been de-zoned, including extent of same, due to SEA, Flood Risk Assessment (FRA) and/or Appropriate Assessment (AA).
- d. Where excessive lands may have been zoned for development in the previous plan, this should be highlighted.

#### Response

- 3a. The Zoning Map for the town is included in Volume 2 of the Plan.
- b. The amount of lands zoned for residential development is prescribed in Chapter 2 of the Plan. Phasing of development is dealt with in some of the Framework Plans in the town.
- c. This issue is to be addressed in the SEA Statement.
- d. There were no excessive lands zoned for development in the previous plan.

### 4. Chapter 4 – Economic Development.

- a. The intention to implement an SDZ to the east of Athlone for employment, innovation, research and development is noted; it should be clarified whether the SDZ has been formally designated.
- b. The designation of the SDZ should be considered in the context of the lands zoned *Strategic Gateway Zone* (112ha) in the existing Creggan LAP and the additional extensive lands zoned as *Key Employment Area* in Figure 2 – *Athlone Core Strategy Map* and as *Commercial, Enterprise & Employment and Innovation Technology* in the *Athlone Zoning Map* (Volume 2 – Book of Maps).
- c. A map showing the location/proposed location of the SDZ should be provided for clarity.
- d. Ensure that the SDZ is development in accordance with the requirements of the Habitats, Birds, Water Framework, SEA and EIA Directives.

## Response

4a-c. The plan provides for the development of an SDZ to the east of Athlone, the location of which is unknown at present. It is further stated in Section 4.7 of the plan that the implementation of the SDZ will be likely to occur beyond the timeframe of the proposed plan.

4d. Objective O-EC1 has been amended as follows:

*“To identify and progress the establishment of a Strategic Development Zone, to the east of Athlone, subject to environmental constraints and Habitats Assessment, particularly in relation to Crosswood Bog and Carn Park Bog”*

## 5. Chapter 5 - Town Centre and Urban Design.

- a. **Objective O-CA1** should be amended as follows: *‘To examine the potential to construct a new bridge across the River Shannon linking the east and west areas of the town for pedestrians and cyclists, **subject to the requirements of the Habitats Directive, Water Framework Directive, EIA Directive and other relevant EU Directives.**’*
- b. Anomaly regarding mixed use area (including residential) is proposed for part of *Opportunity Site 7 – Ranelegh Site* however this is zoned for Sporting/Recreational and Enterprise & Employment; clarification is sought in this regard.

## Response

5a. Objective O-CA1 has been amended in this regard

5b. Opportunity Site No. 7 is zoned for open space and Enterprise and Employment. This area is not intended to be developed for either residential or mixed use.

## 6. Chapter 9 - Arts, Culture and Tourism.

- a. **Objective P-TRM3** should be amended as follows: *‘To continue to encourage and promote the **sustainable** development of a range of quality tourism facilities, attractions and accommodation within the town.’*

## Response

6. Objective P-TRM3 has been amended in this regard.

## 7. Chapter 11 – Natural Heritage, Built Heritage and Archaeology.

- a. **Objective P-NH10** should be amended as follows; *‘To require **Appropriate Assessment (Habitats Directive Assessment)** and, where relevant, appropriate environmental assessment such as EIA (Environmental Impact Assessment) or ecological appraisal for developments not directly connected with or necessary to the management of a European site and which are likely to have significant effects on the **integrity of the site individually or cumulatively.***
- b. A map of the Green Route Strategy should be considered.

## Response

7a. Policy P-NH10 has been amended accordingly.

7b. A Green Route Strategy Map was not included in the Plan.

## 8. Chapter 12 – Development Management Standards

- a. Section 12.24 – Energy states that ‘*Wind energy development proposals will be considered in designated industrial, enterprise and research areas*’ – it should be clarified whether this applies to lands located within the Plan boundary.

### Response

Section 12.24 of the Plan was amended to apply to lands within the plan boundary.

## 9. Chapter 13 – Land Use Zoning

- a. A table outlining the amount of lands (ha) zoned under each zoning category should be considered in the interest clarity.
- b. Proposed rezoning/de-zoning/phasing of lands since the previous plan should be highlighted.
- c. Section 13.1 - Land Use Zoning Categories should include “*Innovation Technology*,” “*Strategic Gateway Zone*” and “*Live Work*”. These categories are included as zoning types on *Athlone Zoning Map in Volume 2 - Book of Maps*.
- d. Section 13.2 should discuss all of the relevant categories applicable to the Plan and Land Use Objectives should be presented in the Zoning Objectives Table at the end of Section 13.2.
- e. Volume 2 - Maps - It is noted that areas of un-zoned land are located within the Plan boundary. Clarification required regarding the intended use of these lands.

### Response

9a. A table outlining the amount of lands zoned under each land use category is provided in Chapter 2 of the Plan.

b. A statement is included in Chapter 13 of the Plan with regard to the amount of land dezoned since the previous Town Plan.

c-d. Section 13.1 was amended to include “*Innovation Technology*” and “*Strategic Gateway Zone*” as land use categories. “*Live Work Units*” does not constitute a land use category.

**Submission of:** EPA (Environmental Protection Agency) in relation to the Environmental Report

**Date Received:** 11<sup>th</sup> April 2013

## 1. Volume 2 Environmental Report

- (a) The comments below relate to the Strategic Environmental Assessment Report and the Environmental Report; the comments and suggestions in this section are put forward for consideration and mainly relate to the key stages and outputs of the SEA Process.
- (b) An inconsistency between the Non-Technical Summary (NTS) and the Environmental Report (ER) is noted; the NTS states that “*no significant impacts have been identified as part of the SEA process. Consequently, it has been determined that no additional monitoring is required.*” The ER, however, outlines the mitigation measures and a monitoring programme which were recommended by the SEA.
- (c) It is noted that a matrix (which has not been included in the ER) was used to identify the impacts of the Plan on the Environmental Objectives. Consideration should be given to including the assessment matrix in the Environmental Report (ER) or as an Appendix to the ER, for clarity and transparency.



## 2. Chapter 1 - Non-Technical Summary (NTS)

- a. Section 1.3 – Recommend that same should include the main objectives of the Plan.
- b. Section 1.6 – *Characteristics of the Existing Environment in Athlone*, and the Environmental Objectives and Targets and Indicators in Section 1.7 - *SEA Objectives, Targets and Indicators* should include summary information on the key environmental issues.

## 3. Chapter 2 - Introduction

- a. Section 2.2 - Draft Athlone Town Development Plan 2014- 2020 should be amended as follows: “Promoting **sustainable** economic development and employment creation, within defined economic clusters in established Business Parks such as Garrycastle, Blyry, Athlone Business Park and the Strategic Gateway Zone.”
- b. Section 2.2 should also be amended as follows: “*Pursing the appropriate and sustainable development of identified opportunity sites in the town.*” It should be clarified in the SEA and Plan how these opportunity sites were selected, and whether they have been subject to FRA and AA”.
- c. Consideration should be given to summary of each of the Plans, Programmes and Strategies listed in Section 2.4 - *Spatial and Environmental Policy Hierarchy Context of the ATP 2014-2020*; together with a commentary on the relationship between same and the Athlone TDP.

## 4. Chapter 3 - SEA Methodology

- a. Chapter 3 - *SEA Methodology* included the development of measures to mitigate negative effects and the development of monitoring proposals; recommend that same be included in the ER together with a commitment to implement mitigation measures and monitoring programmes should be included in the Plan.
- b. SEA related monitoring should be linked with the interim review of the Plan.
- c. *Section 3.2 –Scoping* should be clarify whether the Department of Arts Heritage and the Gaeltacht (including NPWS) and the Department of Agriculture Food and the Marine were consulted as part of the SEA Scoping Process.
- d. Recommend that a summary of the submissions made on the Scoping Report and how same have been taken into account in the Plan is included.

## 5. Chapter 4 - Athlone current State of the Environment

- a. Chapter 4 - *Economic Development* should be take account of the selection of an appropriate site for, and the designation of, the SDZ having regard to the location of Crosswood Bog SAC and Carn Park Bog.
- b. Section 4.2.5 - *Trees & Hedgerows* that “a high proportion of hedgerows in the Athlone area are classed as ‘species rich hedges’ with some ‘species poor hawthorn hedges’ – recommend mapping of same where available.
- c. Section 4.4.1 - *Identification of potential environmental issues relating to Soil & Geology*; the loss of greenfield lands should be included as a potential environmental issue.
- d. Section 4.7.2 - The loading of the Waste Water Treatment Plant (WWTP) should be updated to reflect the most recent loading figures.
- e. Section 4.5.5 - *Identification of Potential Environmental Issues relating to Water Resources* or Section 4.7.6 - *Identification of Potential Environmental Issues relating to Material Assets*, should be discuss the fact that the Athlone WWTP and the Golden

Island Pumping Station are located within an area at risk of flooding (*Athlone Flood Risk Map, Volume 2 - Book of Maps and Figure 4.6 - Soil Map of Athlone*).

- f. Section 4.9 – Landscape; recommend inclusion of a landscape character map, including important views and prospects.

## 6. Chapter 5 - SEA Objectives, Targets & Indicators

- a. Recommend that 'Indicators' are linked with relevant Objectives and Targets.
- b. Recommends more frequent monitoring (e.g. at 2 yearly intervals rather than 6) and a department responsible for collating data be included.

## 7. Chapter 6 - Assessment of Likely Significant Effects

- a. Section 6.2 - *Methodology for Assessment and Determination of Significance of Effects*; recommends that changes/mitigation measures referred to are documented in the ER and Plan.
- b. Sections entitled *Measures to Prevent, Reduce or Offset* –advises that recommendations made are carried forward into the plan.
- c. Where exact policy/objective (mitigation measure) has been included in the Plan, there would be merit in the ER to identify which option was chosen and the reason for choosing the preferred mitigation measure.
- d. Where uncertain impacts/negative impacts, have been identified, these should be linked to appropriate mitigation measures and monitored to ensure negative impacts do not occur.
- e. Recommend clarification as to whether or not a cumulative effects assessment was carried out, particularly in the context of the Monksland/Bellanamullia LAP.

## 8. Chapter 8 - SEA Monitoring

- a. The monitoring programme should be included in this Chapter.  
Consideration should be given to the following:
  - The inclusion more frequent monitoring (at 2-3 yearly intervals rather than 5-6 yearly).
  - Monitoring of both positive and negative effects, where they occur.
  - Inclusion of the on-going review of environmental targets and indicators in the monitoring programme. Responsibility for this role should be clearly defined.
  - Linking monitoring programme and reporting with Plan implementation review and reporting.
- b. The Monitoring Programme should be flexible to take account of specific environmental issues (as they arise) and should incorporate provisions for cumulative effects.
- c. The Monitoring Programme needs to identify the actual departments responsible for collecting, collating and analysing the data should be identified - as soon as possible after the Plan has been adopted.

### Response

1a-b, 2a-b, 3a-c, 6f-g, 8a-c. Noted. Any future draft will be amended accordingly.

4a-d. Section 1.10 of the Plan has been amended to include a commitment to establish a monitoring report in accordance with recommendations made in the SEA Environmental Report.

5a-f. Noted. Objective O-EC1 regarding the SDZ has been amended to take account of Crosswood bog and Carn Park SAC's.

7a-b. Noted.

7c-d. The measures to prevent reduce and offset were set out in the appendices to the Environmental report, these can be made available.

7e. A cumulative effects assessment was not carried out, in the context of the Monksland/Bellanamullia LAP.

**Submission of:** Department of Arts, Heritage and the Gaeltacht to the Draft Plan

**Date Received:** 12<sup>th</sup> April 2013

#### Summary of Submission:

1. The draft Athlone Town Plan is situated within a location likely to have an impact on the Shannon Callows SAC 000216, the Middle Shannon Callows SPA004096, Lough Ree SAC000440/SPA004964 and on Crosswood bog SAC002337. Mitigation measures should be strictly observed. In addition, consideration should be given to the following;

- a. **Natural/ Build Heritage -**
  - **OWW4** - "Assess development proposals which involve lighting along water courses, rivers, streams and canal corridors, in order to mitigate impacts of lighting on bats and other species" could also include tree lines and urban woodland in its list of habitats.
  - *Control of Invasive Species* – Use of certified weed free material should be promoted and supported to prevent further spread.

#### Response

a. Objective O-WW4 has been amended in this regard.

Section 11.14 has been amended to promote the use of certified weed free material to prevent the spread of invasive species.

- b. **Tourism –**
  - **O-TRM4** - walking routes along shores of Lough Ree and Shannon Callows, should state that they will be subject to environmental constraints.

#### Response

b. O-TRM5 has been amended as follows:

"To explore the provision of sustainable medium to long distance walking routes, focusing on the River Shannon and Lough Ree, in cooperation with Roscommon County Council, subject to environmental constraints and the requirements of the Habitats Directive"

- c. **Transport -**
  - **O-WC3** - "To provide a greenway incorporating a walking/cycling route along the entirety of the Athlone Mullingar railway line" should state that it will be subject to environmental constraints.
  - Any new/ existing mammal mitigation measures installed during road construction/upgrades should be managed and repairs carried out where necessary.

**Response**

c. O-WC3 is supported by Objectives O-WC15 and O-WC17 which provide for the development of the Dublin Galway National Cycle Route and a network of pedestrian and cycle routes in the town, subject to habitat protection requirements.

d. **Energy –**

- A once off/ small scale wind turbines needs to be considered in combination with the potential impact upon local/ migrating bat and bird populations

**Response**

A new objective O-REN 6 was inserted in Section 8.7 of the plan as follows:

“To consider local and migrating bat and bird populations in the assessment of applications for small-scale wind turbines in the town”

**Submission of:** Department of Environment, Community and Local Government to the Draft Plan  
**Date Received:** 12<sup>th</sup> April 2013

**Summary of Submission:**

1. In broad terms, the draft plan represents a considered response to the development issues in the town, which is a key part of the linked Gateway of Athlone-Tullamore-Mullingar as outlined in the NSS.
2. The Department requests that the Planning Authority addresses the following points in its deliberations on the plan:-
  - a. The plan is weak with respect to its strategic context. It should:
    - (i) Indicate the objectives (incl. zoning objectives) of the environs of Athlone in Roscommon (in addition to those depicted in Westmeath), co-ordinating with those objectives for Roscommon.
    - (ii) Include additional objectives with regard to the co-ordinated development of the Midlands Gateway and should further outline the specific function Athlone is to play (as distinct from Tullamore and Mullingar) in the context of the overall collaborative development of the Gateway. This should be outlined at the beginning of the plan.
3. Table 2.3 (written statement – regarding population estimates and housing land requirement as derived by Midlands RPGs) - it is unclear how the land requirements as per Table 2.3 translates into the amount of land already zoned for housing throughout the town and LAPS. The Written Statement should incorporate such information in the Core Strategy to clearly demonstrate how the population and housing land provisions for the town derive from the Midlands RPG and the Core Strategy.
4. The addition of new lands zoned for residential development at Hillquarter have not been justified (with reference to above) and has been flagged in the SEA report as presenting adverse effects; same should be removed from the draft plan.
5. The Core Strategy diagram (Fig. 2.4) needs to be amended in line with issues raised at (2) above and should also more clearly explain the reasons for the overall strategy for the development of the town by:

- (i) Putting a greater emphasis on the role of the town as a regional shopping, services and tourism destination.
  - (ii) Acknowledging the significant housing areas on the west bank, incl. social housing in need of regeneration and integration into the town fabric and the presence of significant housing and employment areas in the adjoining administrative area in Monksland Roscommon.
  - (iii) Depicting the presence of flooding and environmental parameters running along the River Shannon that to extent displace future housing areas northwestwards and eastwards.
6. Flood risk is a major issue for Athlone. Department notes that currently underutilised industrial lands on the west bank close to the River Shannon are depicted as being both located in a high risk flood area and as an opportunity site for redevelopment; it is not clear for from the draft plan if this is in fact possible. Accordingly, this should be amended to include additional detail as to how the potential conflict can be reconciled or otherwise deleted.

### **Response**

1. Noted.

2(i) Sections 1.1 and 2.1 of the Plan has been amended to take into consideration the local planning framework for the environs of Athlone, as set out in the Monksland Bellanamullia Local Area Plan 2010-2016.

2(ii) Section 2.1 of the Plan has been elaborated upon to outline the specific function Athlone is to play in the context of the Linked Gateway.

3. The plan has incorporated population estimates and housing land requirement in the Core Strategy chapter.

4. In the adopted Plan, lands have been dezoned at Hillquarter.

5. Fig. 2.4 has been amended in this regard.

6. The Addendum to the SFRA outlines that the area subject to flood risk is zoned for Open Space. This proposed zoning represents low vulnerability to flood risk and therefore satisfies the sequential approach.



## Submissions in relation to Material Amendments to the Plan

**Submission No:** ATP MA008

**Name:** EPA (Environmental Protection Agency)

### Main Issues Raised:

#### 1. Chapter 2 – Core Strategy

- a. In relation to the proposed '*Destination Athlone*' tourism initiative referred to in *Section 2.3*, consideration should be given to taking into account the requirements of the SEA Directive (S.I. No. 435 of 2004 as amended by S.I. No. 200 of 2011), for tourism-related sectoral plans which may set the framework for other Plans/Programmes and which may have potential to have likely significant effects on the environment.
- b. In *Section 2.6*, there would be merits in highlighting whether a phased development (within the lifetime of the Plan) of these additional proposed residential lands is considered.
- c. It is submitted that in light of the current economic climate and given the limited demand for additional zoned residential lands, consideration should be given to phasing the available 139 ha of proposed residential lands over the lifetime of the Plan.
- d. Where lands are not required to be developed over the lifetime of the Plan, consideration should be given to de-zoning / re-zoning / strategic land reservation as appropriate. Where undeveloped zoned lands exist adjacent or in proximity to Natura 2000 sites, or are at risk of significant flooding, these lands should be prioritised for de-zoning/re-zoning as relevant and appropriate.
- e. EPA acknowledge new policies P-CS7 (infill development prioritisation), and P-CS9 (Restricting development in flood risk areas).
- f. In *Section 2.9.1 Employment Policy*, the proposal (in Objective O-CS3) to advance the SDZ for employment generating uses to the east of Athlone, in collaboration with Westmeath County Council, subject to the requirements of the SEA, AA and Floods Directives respectively is noted. It should be ensured however, that the Crosswood Bog and Carn Park Bogs are protected in any such proposed development. Consideration should also be given to establishing an ecological buffer zone from areas considered for development under the proposed SDZ.

#### 2. Chapter 6 – Transport and Movement

The proposed Land Use Transport Strategy (LUTS) being considered for the plan area is noted. Consideration should be given to taking into account the requirements of the SEA Directive in relation to 'transport sector' related plans which may set the framework for other plans and programmes.

#### 3. Chapter 8 – Energy & Communications

- a. The new objective O-REN 6 relating to a commitment to take into consideration bat and bird migrations in the assessment of small scale wind turbines is acknowledged.
- b. Consideration should also be given to taking into account the ecological corridors/linkages supporting migration pathways as appropriate. The requirements under the EIA and AA Directives in particular should be taken into account.
- c. Consideration should also be given to including a reference to the *Methodology for Local Authority Renewable Energy Strategies* (SEAI, 2013) which should be integrated as

appropriate. Other relevant guidance includes the EU Guidance: “*Wind Energy Developments and Natura 2000 sites*” (October 2010)”, which should be integrated as appropriate.

#### 4. Chapter 12 – Development Management Standards

- a. In Section 12.24 - Energy, EPA draws attention to the *Methodology for Local Authority Renewable Energy Strategies* (SEAI, 2013) which should be referred to and integrated as appropriate.

#### Response

1a. No reference was made to the taking into account of the SEA Directive in the context of “Destination Athlone”

1b-e. Noted

1f. Objective O-EC1 has been amended in this regard. Consideration of development of an ecological buffer zone is premature pending establishment of the SDZ.

2. Noted

3a-b. Objective O-REN 6 was incorporated into the Plan.

3b-4a. Reference to the *Methodology for Local Authority Renewable Energy Strategies* has not been incorporated into the Plan.

## Section 5 CONSIDERATION OF ALTERNATIVES

### 5.1 Introduction

The SEA Directive requires that reasonable alternatives (taking into account the objectives and the geographical scope of the plan or programme) are identified, described and evaluated for their likely significant effects on the environment. Taking into account the objectives and the geographical scope of the Plan, alternatives were formulated as follows:

### 5.2 Consideration of Alternative Strategies

Alternative strategies that were considered are outlined below. The 'Do Nothing Scenario', which is that which could occur in the event of non implementation of the new plan 2014-2020 and the continuation of the last plan 2008-2014 is outlined in terms of environmental implementations at the end of each of the sections of the environmental baseline in Chapter 4. As such it will not be discussed in this section.

**Alternative A:** Do Nothing Scenario (discussed in Chapter 4)

**Alternative B:** Promote the Gateway Status of the Town

**Alternative C:** Greenfield expansion at outer periphery

**Alternative D:** Consolidation of Urban Core and plan led expansion of Inner edge and environs (Dezoning)

### 5.3 Preferred Alternative

The preferred alternative as outlined above was considered in the light of the significant environmental issues for the plan area as discussed in the chapters above. It was considered the preferred alternative was that of the 'Consolidation of Urban Core and Plan led expansion of inner edge and environs'. The main features of this strategy are as follows:

- Supports the role of the town as a Midland's Linked Gateway by channelling development into the town and maximising the use of serviced land.
- Consolidates development to the town and its environs and encourages brownfield and infill development.
- The LAPs for the area allows for the coordinated and sequential development of the town and environs and maximises the use of serviced lands.
- Encourages a mix of land uses where appropriate through land use zoning and supports for sustainable transport modes to reduce unsustainable forms of travel.
- Promotes a coordinated and plan led approach to the strengthening and future development of the social, physical and economic infrastructure for the Plan area.
- Protects the rural area beyond the town's environs.
- Promotes tourism within the town while protecting the natural and built environment of the town.
- Protects the floodplains within the town from further development.

A monitoring programme is developed based on the indicators selected to track progress towards achieving Strategic Environmental Objectives and reaching targets, enabling positive and negative impacts on the environment to be measured. The environmental indicators were been developed to show changes that would be attributable to implementation of the proposed Athlone Town Development Plan.

The 2 year review of the Athlone Town Development Plan under Section 15(2) of the Planning and Development Acts 2000-2010 as amended shall be the main point of monitoring progress on implementation of the plan.

## Section 6 MONITORING

The SEA directive requires that the significant environmental affects of the implementation of plans and programmes are monitored. This SEA Statement identifies the proposals for monitoring the Plan. Monitoring enables, at an early stage, the identification of unforeseen adverse affects and the undertaking of appropriate remedial action. In addition to this, monitoring is important in assessing whether the Plan is achieving objectives and targets and whether the proposed mitigation measures are being implemented. Monitoring also requires that positive impacts on the Environment are also measured. In accordance with the recommendations of the Environmental Report and Submissions by the EPA, the Plan includes a commitment to implement an Environmental Monitoring Programme.

### 6.1 Indicators and Targets

Section 5 of the Environmental Report prescribes indicators, frequency of monitoring and targets for each of the Seventeen Strategic Environmental Objectives. The following is a summary of targets which have been set under the various Environmental Headings

SEO	TARGET
<b>Biodiversity, Flora and Fauna</b>	Maintenance of favourable conservation status for all designated habitats and species.
	Compliance with WFD Shannon RBMP
<b>Population and Human Health</b>	Reduction in average distance and time in travel to work, school or college
	Improved recreational amenity and open space provision
	Increased sustainable employment opportunities
<b>Water Resources</b>	Abstractions to be maintained within the Environmental carrying capacity of the water body
	Achieving good water quality status for all Water Bodies by 2015
<b>Soils</b>	Prioritise Brownfield Development
	No new properties to be affected by flooding
<b>Cultural Heritage and Landscape</b>	All ministerial recommendations to be included in RPS.
	Management Plan to be prepared for Lough Ree

	Appropriately assess all applications affecting geomorphological sites
<b>Air and Climate</b>	<p>Increased public transport use</p> <p>Reduction in total numbers of long journeys</p> <p>SEAI Targets for energy efficiency in Building Design and Consumption</p>

## Section 7 Material Amendments to the Plan

Proposed material amendments to the Plan were also considered under the SEA process. This involved an assessment of the degree to which impacts on Strategic Environmental Objectives and relevant provisions of the Environmental Report arise. The principle areas of impact recorded concerned the following;

- The Environmental Carrying Capacity required to accommodate predicted growth and economic development.
- The need to prepare a joint Plan for the Gateway Town including County Roscommon area and the necessity to monitor Plans and Development Trends in the Roscommon environs in the interests of securing integrated development and protection of the Environment.
- Environmental Sensitivities associated with proposed bridge across the River Shannon.
- Environmental Constraints attaching to the provision of walking routes to the River Shannon and Lough Ree including Habitat Directive requirements.
- Environmental constraints including compliance with Habitat Directive in respect of developments for recreational and tourism purposes, including river transport.
- Removal of structures intended for addition to the RPS from the draft Plan.
- The amendments were the subject of a SFRA and recommendations arising were incorporated into the Plan including recommendations with respect to opportunity sites no.

## Section 8 Summary of Influence of the SEA Procedure on the Plan

The influence of the SEA process on the Development Plan has been positive. Early identification of the important environmental issues and refinement of those issues during the scoping process and production of the Environmental Report allowed for incorporation of environmental protection policies and mitigation measures into the Development Plan. Further assessment of policies and amendments, as well as submissions and observations from Environmental Authorities and other parties resulted in modification and/or removal of certain policies. An assessment of proposed material amendments to the Development Plan was also undertaken and it was determined that some of the amendments were likely to give rise to adverse impact, which impacts had been identified earlier in the Environmental Report.



