



Of the Blessington Local Area Plan 2013 – 2019 Strategic Environmental Assessment



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## Section 1 Introduction

#### **1.1 Terms of Reference**

This is the SEA Statement of the Blessington Local Area Plan 2013-2019 Strategic Environmental Assessment (SEA).

### 1.2 SEA Definition

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

#### **1.3 Legislative Context**

Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including land use planning. The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No.) 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of Regulations became operational on 21 July 2004.

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

# 1.4 Content of the SEA Statement

The SEA Statement is required to include information summarising:

- a) How environmental considerations have been integrated into the Plan,
- b) How
- the environmental report,
- submissions and observations made to the planning authority on the proposed 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 dealt with, and

d) The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

# 1.5 Implications of SEA for the Plan

As a result of the aforementioned legislation, the Blessington Local Area Plan 2013-2019 was required to undergo SEA. The findings of the SEA were expressed in an Environmental Report, which was submitted to the Elected Members alongside the proposed Draft Plan. The purpose of the report was to provide a clear understanding of the likely environmental consequences of adopting the plan.

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

Changes made to the proposed Draft Plan were evaluated for their environmental consequences and the Environmental Report was updated to become the final Environmental Report.

The Draft Plan and the associated Environmental Report were placed on public display in 20<sup>th</sup> of August 2013. Addendum I to the Environmental Report (which details responses to the submissions on the Environmental Report which were made during the first period of public display of the Draft Plan and the Environmental Report) was included in the Manager's Report circulated to Elected Members. Addendum I proposed updates to the Environmental Report as a result of submissions, as appropriate.

Proposed Amendments to the Draft Plan were evaluated for their environmental consequences. On assessment the proposed amendments were not considered to be material and therefore no further public display period was required.

On adoption of the Draft Plan, the Addendum 1 was used to update the original Environmental Report into a final Environmental Report, which accompanies the adopted Plan.

At each stage of the process the Elected Members took into account the findings of the Environmental Report and/or the Addenda as appropriate.

## Section 2 How Environmental Considerations were integrated into the Plan

#### 2.1 Consultations

The Environmental Protection Agency (EPA), the Department of the Environment, Community and Local Government (DECLG), the Department of Communications, Energy and Natural Resources (DCENR), the Department of Agriculture, Fisheries and Food and the Department of the Arts Heritage and the Gaeltacht and Kildare County Council were all sent a preliminary SEA scoping report indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report could be made to Wicklow County Council. Written submissions were then received on the scope of the SEA from the EPA and the Department of the Arts Heritage and the Gaeltacht only.

Further information on the aforementioned submissions is provided under Section 3.2.

#### 2.2 Environmental Sensitivities

#### 2.2.1 Mapping and Early Communication

Environmental considerations were integrated into the Draft Plan before it was placed on public display for the first time. Environmental sensitivities were mapped in order to identify which areas of the plan area would be most sensitive to development and would suffer the most adverse effects if future development was to be accommodated in those areas unmitigated.

The sensitivities were communicated to the Plan-making team on a regular basis from the outset of the Plan preparation process. Identifying areas with the most limited carrying capacity within the Plan area helped future growth to be diverted away from these areas.

A sample of the sensitivities considered by the SEA included the following:

- Designated ecological sites;
- Land cover;
- Soil Type;
- Water Framework Directive (WFD) Risk Assessments for Rivers, Lakes, Ground, Coastal and Transitional Waters;
- WFD Register of Protected Areas;
- EPA River Water Quality Monitoring;
- GSI Aquifer Vulnerability and Productivity;
- Flooding Data;
- Waste Water Treatment capacity and demand;
- Drinking water supply;
- Drinking water quality;
- Archaeological Heritage;
- Architectural Heritage;
- Landscape Character Areas; and,
- Protected Views and Prospects.

# 2.2.2 Overlay mapping

A Geographical Information System (GIS) was used in order to weight the above sensitivities and map them overlapping each other - this allowed the identification of where most sensitivities occur. Figures 2.5 (a & b) show the overlay map of sensitivities that was used by the SEA.

Environmental sensitivities are indicated by colours, which range from low environmental sensitivity (light yellow) to high environmental sensitivity (red). Where the mapping shows a concentration of environmental sensitivities there is an increased likelihood that development will conflict with these sensitivities and cause environmental deterioration.

#### 2.3 Early Identification and Evaluation of Alternatives

A range of potential alternative scenarios for the future development of the plan area were identified at an early stage in the process and evaluated for their likely significant environmental effects (see sections 6 & 7 of the ER).

The environmental sensitivities and overlay mapping shown in Figures 2.1 to 2.4 were used in order to predict and evaluate the environmental effects of implementing the scenarios.

Communication of the findings of this evaluation helped the Plan-making team to make an informed choice as to which alternative was to be put before the Elected Members as the proposed Plan.

Communication of this evaluation to the Elected Members through the Environmental Report helped the Elected Members to make an informed choice with regard to the making of the Development Plan.

Mitigation measures which arose from the evaluation and which were integrated into the Plan are detailed under Section 2.4 of this report.



Figure 2.1 Environmental Sensitivities - 1



Figure 2.2 Environmental Sensitivities - 2





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Figure 2.3 Environmental Sensitivities - 3



Groundwater Vulnerability



**CDP Landscape Categorisation** 



Figure 2.4 Environmental Sensitivities - 4





# 2.4 Mitigation

## 2.4.1 Introduction

In order to comply with various statutory requirements and in order to comply with the requirements of the statutory consultees, mitigation measures<sup>1</sup> were recommended to be integrated into the Plan.

As the Blessington Local Area Plan must conform to the policies and objectives of the Wicklow County Development Plan (CDP) 2010 - 2016 the plan does not include a repetition of the policies, objectives or strategies as set out in the CDP. Where standards or objectives for a particular development are not included in the Local Area Plan, the provisions of the CDP are to apply.

Taking this into consideration there are a wide range of mitigation measures/objectives within the County Development Plan that are applicable to Blessington.

The wide range of topics these mitigation measures cover include:

- Designated Ecological Sites
- Ecological Connectivity
- Human Health
- Brownfield Development
- Status of Surface and Groundwaters
- Flooding
- Water Services (Waste Water and Drinking Water)
- Greenhouse gas emissions and car dependency
- Archaeological Heritage
- Architectural Heritage
- Landscape

Mitigation measures generally benefit multiple environmental components i.e. a measure providing for the protection of surface water resources could beneficially impact upon the protection of biodiversity, flora and fauna, drinking water resources, human health and provision of appropriate waste water treatment infrastructure.

The mitigation measures are identified in Section 9 of the Environmental Report and this identification is reproduced in Table 2.1 (a & b) below. The reference codes identified are those which accompany the relevant measures in both the Plan and Section 8 of the Environmental Report. As set out above, As the Blessington Local Area Plan must conform to the policies and objectives of the Wicklow County Development Plan (CDP) 2010 – 2016 Table 2.1 (a) also provides a brief breakdown of the relevant mitigation measures contained in the County Development Plan 2010 – 2016.

<sup>&</sup>lt;sup>1</sup> Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing a human action, be it a plan, programme or project. Mitigation measures can be roughly divided into those that: prevent effects; reduce the magnitude or extent, probability and/or severity of effect; repair effects after they have occurred, and; compensate for effects, balancing out negative impacts with other positive ones. Where there are likely to be significant negative effects, consideration should be given in the first instance to preventing these effects or, where this is not possible, to reducing the effects.

Mitigation Measure Topic	Objectives of the Blessington Local Area Plan
Biodiversity Flora and Fauna	BD1, BD2, BD3, BD4, BD5, BD7, BD8, BD9, AA1, AA2, AA3, AA4
Water	S1, S2, S3, S4, S5
Soil	S1, S2, S3, S4,
Landscape	S1,
Air and Climatic Factors	S1, E2
Archaeological Heritage	S1, BD4, AA1, AA2, AA3, AA4
Architectural Heritage	S1, BD7, BD8, BD9, AA1, AA2, AA3, AA4
Transport	TC2
Waste Management	S1,

### Table 2.1 (a) Blessington Specific Mitigation Objectives.

The following sets out relevant objectives of the Wicklow County Development Plan 2010 – 2016 that would be applicable to the Blessington Local Area Plan. Table 2.1 (b) below provides an extract of the measures integrated into the County Development Plan as mitigation measures.

**WW2** of Chapter 12 of CDP 2010-2016: "To ensure that all foul water generated is collected and discharged after treatment in a safe and sustainable manner, having regard to the standards and requirements set out in EU and national legislation and guidance documents. The Planning Authority will continue to monitor the cumulative effect of grants of planning permission on available waste water treatment capacity under the terms of the relevant Waste Water Discharge Licence. Where there is inadequate capacity within a Waste Water Treatment Plant to accommodate new development or where the Waste Water Treatment Plant does not meet the terms of the relevant Waste Water Discharge License to the Planning Authority will:

(a) Refuse planning permission for the development, or

(b) Consider granting permission with conditions limiting the commencement of development until facilities are suitably upgraded, so long as this is planned to occur within a reasonable timeframe (not more than 3 years) in accordance with the Local Authority's Water Services Investment Programme."

**WT1** of Chapter 17 of CDP 2010-2016: "To implement the *EU Water Framework Directive* and associated River Basin and Sub-Basin Management Plans and the EU Groundwater Directive to ensure the protection, improvement and sustainable use of all waters in the County, including rivers, lakes, ground water, coastal and estuarine waters, and to restrict development likely to lead to a deterioration in water quality."

**WT3** of Chapter 17 of CDP 2010-2016: "To prevent development that would pollute water bodies and in particular, to regulate the installation of effluent disposal systems in the vicinity of water bodies that provide drinking water or development that would exacerbate existing underlying water contamination."

**WT4** of Chapter 17 of CDP 2010-2016: "To minimise alterations or interference with river/stream beds, banks and channels, except for reasons of overriding public health and safety (e.g. to reduce risk of flooding); a buffer of 10m along watercourses should be provided free of built development, with riparian vegetation generally being retained in as natural a state as possible. In all cases where works are being carried out, to have regard to Regional Fisheries Board 'Requirements for the protection of fisheries habitat during the construction and development works at river sites'."

**FL7** of Chapter 12 of CDP: "To require all new developments to include proposals to deal with rain and surface water collected on site and where deemed necessary, to integrate attenuation and SUDS measures."

**FL9** of Chapter 12 of CDP 2010-2016: "For developments adjacent to all watercourses of a significant conveyance capacity or where it is necessary to maintain the ecological or environmental quality of the watercourse, any structures (including hard landscaping) must be

set back from the edge of the watercourse to allow access for channel clearing/maintenance/vegetation. A minimum setback of up to 10-15m will be required either side depending on the width of the watercourse"

# Table 2.1 (b) Wicklow County Development Plan SEA mitigation measures (source table 2.1 SEA Statement of the Wicklow County Development Plan 2010 – 2016)

Mitigation Measure Topic	Provisions Integrating Considerations into the Plan
Designated Ecological Sites	Objectives: BD1, BD2, BD8 and BD7
Ecological Connectivity	Objectives: BD3, BD4, BD5, BD6 and BD9
Human Health	Objectives: AE1, AE2, AE3, NP1, NP2, NP3, NP4 and EMP 14 Also see measures related to water quality, flooding, waste water treatment and drinking water supply and quality.
Brownfield Development	Provisions of Chapter 4 Population, Housing and Settlement, Provisions of Chapter 5 Urban Development and Objectives EMP8, RUR4 and RW4
Status of Surface and Groundwaters	Objectives: RH3, AGR1, AGR4, FTY2, FSH1, WW3, WT1, WT2, WT3, WT4, WT5 and WT6
Flooding	Goals 7 and 10 and Objectives FL1, FL2, FL3, FL4, FL5 and FL6
Water Services (Waste Water and Drinking Water)	Objectives: W51, W52, W53, W54, W55, WW1, WW2, WW3, WW5, WW7 and WW8
Greenhouse gas emissions and car dependency	Objectives: PT1, PT2, PT3, PT4, PT5, PT6, PT7, PT8, PT9, CW1, CW2, CW3, CW4, CW5, TE1 and TE2
Archaeological Heritage	Objectives: AR1, AR2, AR3, AR4, AR5 and AR6
Architectural Heritage	Objectives: AH1, RPS1, RPS2, RPS3, RPS4, RPS5, VA1, VA2, VA3, ACA1, ACA2, ACA3, ACA4 and ACA5
Landscape	Objectives: LA1, LA2, LA3 and VP1

#### Section 3 Environmental Report and Submissions & Observations

#### 3.1 Introduction

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

### 3.2 SEA Scoping Submissions

The Environmental Protection Agency (EPA), the Department of the Environment, Community and Local Government (DECLG), the Department of Communications, Energy and Natural Resources (DCENR), the Department of Agriculture, Fisheries and Food, the Department of the Arts Heritage and the Gaeltacht and Kildare County Council (being a bordering authority) were all sent SEA scoping reports indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report could be made to Wicklow County Council. A written response was received on the scope from the EPA, the Department of Arts Heritage and Gaeltacht and Kildare County Council.

The following written submissions were received from the Environmental Authorities with specific reference to the SEA process and the production of the Environmental Report. The content of these submissions was taken into account in formulating the environmental report.

#### 1) Environmental Protection Agency:

This submission included an SEA Guidance document and SEA Pack to assist in undertaking an environmental assessment as per the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004).

#### Specific Issues required to be considered:

- ⇒ Provision of adequate and appropriate critical service infrastructure in advance of permission for development being considered.
- ⇒ Protection of designated national and international conservation sites (Poulaphuca Reservoir SPA, Wicklow Mountains SPA/SAC and Red Bod (SAC) in particular.
- $\Rightarrow$  Protection of surface and ground water quality.

#### General Guidance:

The SEA process Guidance Document was received which included details of environmental issue which where to be integrated into the Blessington Local Area Plan including:

Water Related Issues, Biodiversity, Air Noise and Climatic Factors, Energy Conservation and Renewable Energy, Landscape Character Assessment, Geology, Human Health and Quality of Life, Transportation, Tourism, Infrastructure Planning, Urban Waste Water Discharge Licensing, Waste Management, Environmental Impact Assessment in relation to SEA.

This submission also included the EPA SEA pack which comprises a combination of guidance, checklists and reference material for use in the SEA and Plan making process.

#### 2) Department of Arts, Heritage and Local Government:

This submission highlighted the issues of protected species that occur outside designated sites. The Environmental Report should include species protected under the Wildlife Acts of 1976-2010 which may occur anywhere in the country, and not necessarily inside a designated area.

Reference is also made to the data of the National Parks and Wildlife Service (NPWS) at www.npws.ie and the data of the National Biodiversity Data Centre at <a href="http://www.biodiversityireland.ie/">http://www.biodiversityireland.ie/</a>

Recommend that the preliminary draft mitigation measures listed in the scoping report include protected species.

# 3) Kildare County Council

The principle issues raised in this submission in relation to the preparation of the Blessington Local Area Plan and SEA where listed as follows:

# SPA Poulaphouca reservoir

- ⇒ disturbance or removal of feeding grounds of whooper swans in lands not designated by the SPA status but integral to the conservation of the species and the SAC due to recreational activities within and adjacent to the lakes (should be covered in NIS)
- $\Rightarrow$  water quality

# **Red Bog**

- $\Rightarrow$  Water table vulnerability
- $\Rightarrow$  Water quality

#### 3.3 Environmental Report Submissions and Observations:

Addendum I of the Environmental Report dealt with issues raised specifically relating to the SEA and Appropriate Assessment Screening Report of the Draft Blessington Local Area Plan 2013 - 2019. The EPA was the only SEA consultee that made a follow up submission on the Draft Plan. This submission raised issues specific to the preparation of the environmental report and AA screening report.

Section A below provides a summary of the more general issues raised in the EPA submission. Section B contains details of the more specific issues in relation to the Environmental Report on the Daft Local Area Plan.

#### Section A: General Issues raised:

1) The submission makes reference to Annex 1 of Directive 2001/42/EC (SEA Directive) and schedule 2B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) for "information to be contained in the Environmental Report".

2) Welcome the inclusion of a number of issues raised from there previous submission.

3) State that consideration should be given to the inclusion of specific commitment to water conservation measures in the Plan, as well as aligning with the ERBD Management Plan and its associated Programme of Measures and the Eastern CFRAMS and associated Plan.

4) Consider that the development of the proposed Action Areas should be developed in a coherent and consistent manner to ensure that a coordinated approach is adopted and the Policies and Objectives of the Plan are fully integrated into each area as relevant. The development of these areas should be carried out in a sustainable manner compliant with the requirement and objectives of environmental legislation.

5) Highlight the requirement to prepare an SEA statement in accordance with Article 141 of the Planning and Development Regulations as amended by Article 8 of the SEA regulations.

6) Consider that provisions should be made in the plan to ensure that any proposed land use zoning or development associated with the plan is not in breach of the requirements of the Water Framework Directive.

7) Clarification required in regard to which strategic environmental objectives specifically mortgage for the potential for groundwater and surface water contamination form the abstraction of sand and gravel.

8) Consider that the plan should seek agreement on an appropriate buffer zone to the Poulaphuca

Reservoir with the National Parks and Wildlife Service.

9) Contend that consideration should be given to clarification of the requirements of the EIA and AA for the proposed completion of the Blessington Inner Relief Road.

10) Consider the plan should include a specific commitment to energy conservation.

11) Consider the plan should include policies/objectives in relation to green infrastructure.

12) Consider that there would be merit in the inclusion of a traffic management plan and Noise Action Plan.

# Section B: Specific Issues raised in relation to the Draft Blessington Local Area Plan and the Environmental Report:

1) Highlight a typing error in the plan in relation to the objective codes used for population and housing and services infrastructure

2) Consider a stronger commitment to flood risk mitigation is required and propose a wording change to objective S3 from "To have Regard" to "To Fully Implement" as appropriate the provisions of "The Planning System and Flood Risk Management" Guidelines (DoEHLG 2009) and the Flood Risk Assessment carried out as part of the plan.

3) Monitoring: Consideration should be given to the inclusion of monitoring frequencies and monitoring for both positive and negative effects of the plan where they occur. This should also include the actual departments responsible for collecting, collating and analysing the data.

4) It should be clarified how the full range of environmental effects of the implementation of the plan, as set out in the SEA Directive and Regulations, (i.e. "secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects"), have been assessed and documented. In particular, you are referred to potential cumulative effects / incombination effects in relation to other plans / programmes / strategies / projects.

5) Waste Water and Infrastructure: The plan should promote as appropriate specific provisions for the implementation of the relevant recommendations set out in the recent Focus on Urban Waste Water Discharges in Ireland report (EPA 2012)

Zoning within the plan should be linked to the availability of and adequacy of water supply and waste water infrastructure.

6) Waste Management: The plan should promote the integration of land use zoning and development to existing and planned availability of waste infrastructure and capacity.

7) The plan should provide for adequate buffers between designated sites and areas zoned for development. This should be carried out in consultation with the NPWS.

8) The plan should make reference to and promote the implementation of the Noise Directive

9) The plan should include objectives in relation to the preparation of an Energy Conservation Strategy.

10) The plan should promote and as appropriate provide the provision of sustainable modes of transport.

11) The plan should highlight that under EIA and Planning and Development Regulations certain projects that may arise during the implementation of the plan may require EIA.

12) The plan should ensure relevant policies and objectives are included to address where appropriate the "Environmental Challenges and Priorities" for Ireland as set out in Chapter 10 of the EPA Irelands Environment 2012.

The information contained in this submission was taken into account by the SEA as well as the Appropriate Assessment, which was undertaken for the Plan. The following updates to the Environmental Reports were identified following the public display period:

1) Insert the following wording at the end of Section 10.5 Reporting: Indicators, targets and corrective and remedial actions will be reviewed during the preparation of the preliminary monitoring evaluation report.

*2) Insert the following wording at the end of the* 1<sup>st</sup> paragraph of Section 7.2

The interactions between the SEOs and the alternatives determine the likely significant effects of implementing the Plan. These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

3) Insert the following wording in Section 8.1:

This section evaluates the Draft Plan provisions. Strategic Environmental Objectives (SEOs) are used for this purpose as outlined under Section 7.2 Use has also been made of the environmental baseline descriptions and the maps of the individual environmental components and the overlay of environmental sensitivities provided in Section 3.

The interactions between the SEOs and the provisions of the Plan determine the likely significant effects of implementing the Plan. These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

#### 3.4 The Environmental Report:

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

Addendum I to the Environmental Report (which details responses to the submissions on the Environmental Report which were made during the first period of public display of the Draft Plan and the Environmental Report) was included alongside the Manager's Report circulated to Elected Members. Addendum I proposed updates to the Environmental Report as a result of submissions, as set out above.

Proposed Amendments to the Draft Plan were evaluated for their environmental consequences. The proposed amendments where not considered to be significant and the plan was adopted at the Council meeting on the 03/12/12.

On adoption of the Draft Plan, Addendum 1 was used to update the original Environmental Report into a final Environmental Report, which accompanies the adopted Plan.

At each stage of the process the Elected Members took into account the findings of the Environmental Report and/or the Addendum as appropriate.

# Section 4 Alternative Plan Scenarios Considered

## 4.1 Introduction

This section describes the alternative scenarios considered for the Draft Local Area Plan, summarises the evaluation for likely significant environmental effects of each scenario which is provided in the Environmental Report and identifies the reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with.

#### 4.2 Description of the Alternative Scenarios

The environmental consequences of 3 alternative scenarios for the Plan were examined.

#### 4.2.1 Scenario 1 Minimal Development Envelope

#### Scenario 1 Minimal Development Envelope

Characteristics of this scenario as set out in figure 4.1 provide for an extensive 200m buffer zone inland from the shoreline of the Poulaphuca Reservoir and designation of lands within this zone for agricultural purposes only, the expansion of Glen Ding Wood and designation as a conservation zone onto lands currently in use as forestry/remediated from quarrying activities within this area. This scenario places a strong emphasis on the protection of locally important Biodiversity sites and ecological networks.

This plan also places a strong emphasis on the protection of the Architectural Conservation Area within the town centre and the provision of increased pedestrian movements by improving access between areas of natural and built conservation value.

In addition to the above measures, this scenario places a strict emphasis on the development of lands only where existing infrastructure is adequate to cater for such development.

#### This plan scenario contains the following specific local objectives:

**Local Objective 1** – To provide for a 200m buffer along the lakeshore of the Poulaphuca Reservoir and restrict lands within this zone to agricultural or conservation and amenity uses only.

*Local Objective 2* – To protect existing ecological linkages and Local Biodiversity areas within the plan area.

*Local Objective 3* - Provision of a conservation and amenity zoning at Glen Ding Wood, to the east of the plan area adjacent to and forming part of Doran's Pit.

*Local Objective 4* – Provision of a new amenity park and employment zone at Roadstone to the north of the town, promoting the conservation and enhancement of existing lands.

Local Objective 5 – Strict monitoring of existing and future quarry activities



Figure 4.1 – Scenario 1 – Minimal Development Envelope

### 4.2.2 Scenario 2 Moderate Development Envelope

# Scenario 2 Moderate Development Envelope

Characteristics of this scenario are similar to scenario 1 with the following exceptions;

1. The 200m buffer along the Poulaphuca Reservoir has been reduced to 100m Buffer zone with agricultural zonings within this area.

2. This plan scenario provides a further c. 60 - 100m of lower order uses adjacent to the buffer zone detailed in scenario 1 above in the form of extensive Active Open Space lands as a further measure aimed at preventing any impacts on the pNHA and designated SPA.

3. A slightly reduced open space and amenity park zone has been provided to the north east of the plan area in recognition of the findings of the local biodiversity study carried out and from on the ground site inspections. The emphasis of this reduced zoning being the protection of the more extensive and fully established areas of woodland in this area with the more unestablished portion being rezoned as an expanded employment zoning.

4. The provision of a larger employment zoning area at Roadstone to the northwest of the town centre providing for a lower density employment development and with the increased lands forming a new amenity park area linked to Glending Woods by pedestrian walks.

5. A recognition of the existing permissions for quarrying activities at Glen Ding with all remaining lands forming part of the Woodland Conservation Zone.

6. The provision of residentially zoned lands adjacent to the Blessington Stream, provided for through the justification test.

#### The scenario includes the following local objectives:

*Local Objective 1* – To provide for a 100m buffer along the lakeshore of the Poulaphuca Reservoir and restrict lands within this zone to agricultural or conservation and amenity uses only.

*Local Objective 2* - Provision of conservation zones at Glen Ding, Burgage Mor and adjacent to Doran Pit.

*Local Objective 3* - To protect existing ecological linkages and Local Bio-diversity areas within the plan area.

**Local Objective 4** - Provision of a new large amenity park and employment zone at Roadstone to the north of the town, promoting the conservation and enhancement of existing lands and linkages to Glen Ding Wood.

*Local Objective 5* – Strict monitoring of existing and future quarry activities.



Figure 4.2 – Scenario 2 – Moderate Development Envelope

#### 4.2.3 Scenario 3 Maximum Development Envelope

This scenario (see figure 4.3) represents a further intensification development and associated impacts set out in scenario 2 with the further encroachment of development into virgin/rural lands to the north and south and east of the plan area. This scenario provides for extensive zonings maximising the development potential and views along the lakeshore with a limited distance between these zonings and the pNHA and SPA.

This scenario aims to maximise the development potential along the lakeshore with the provision of a large area being zoned to provide for a new integrated tourism and leisure facility at Burgage Mor further maximising the tourism potential of the lake.

This scenario also provides for an expansion of existing quarrying activities into Glen Ding Woods providing for a minimal buffer between this area and the listed recorded monuments within this zoning.

A low density residential zoning is provided along the lakeshore to the north east allowing for the provision of single housing overlooking the reservoir. A more dense employment zone is also provided for along the N81 to the north west of the town on lands owned by Roadstone with this plan having little or no regard to the findings of the Local Biodiversity study.

## The scenario includes the following local objectives:

**Local Objectives 1** – Provision of extensive residential development along the Lakeshore with little or no provision for a buffer zone to the Poulaphuca Reservoir.

*Local Objective 2* – Provision of an Integrated Tourism and Leisure development at Burgage Mor to the south of the town maximizing the tourism potential of the lake.

*Local Objective 3* – Provision of low-density residential development with individual wastewater treatment facilities along the lakeshore and within lands zoned for agricultural lands.

*Local Objective 4* – Expansion of existing quarry lands at Roadstone to the north of the town.



Figure 4.3 – Scenario 3 – Maximum Development Envelope

# 4.3 Evaluation of Alternative Plan Scenarios

# 4.3.1 Methodology

# 4.3.1.1 Existing Environment and Overlay Mapping

In order to identify the extent to which environmental sensitivities are likely to be impacted upon by implementation of the 3 scenarios, use was made of environmental baseline data and overlay mapping (see Figures 2.1 to 2.4 of this report).

# 4.3.1.2 Strategic Environmental Objectives (SEOs)

Based on an understanding of the existing and emerging environmental conditions in the Blessington area a series of Strategic Environmental Objectives (SEOs) were identified and developed in order to assess the likely environmental effects which would be caused by implementation of each of the 3 alternative scenarios described above.

The alternatives are evaluated using compatibility criteria (see Table 4.1) in order to determine how they are likely to affect the status of these SEOs.

Table 4.2 brings together all the SEOs, which have been developed from international, national and regional policies, which generally govern environmental protection objectives.

The SEOs and the alternative scenarios are arrayed against each other to identify which interactions - if any - would cause impacts on specific components of the environment. Where the appraisal identifies a likely conflict with the status of an SEO the relevant SEO code is entered into the conflict column - e.g. B1 which stands for SEO likely to be affected - in this instance '*To ensure compliance with the Habitats Directive and National Biodiversity Plan with regard to protected species and habitats both within and outside of designated sites in accordance with the provisions of Articles 6 and 10 of the Habitats Directive'.* 

Likely to	Probable <b>Conflict</b> with status	Potential <b>Conflict</b> with	No Likely
Improve	of SEOs unlikely	status of SEOs- likely to be	interaction
status of	to be mitigated	mitigated	with status of
SEOs			SEOs

Table 4.1 above: Criteria for appraising the effect of Plan provisions on Strategic Environmental Objectives.

SEO B1	To ensure compliance with the Habitats Directive and National Biodiversity Plan with regard to protected species and habitats both within and outside of designated sites in accordance with the provisions of Articles 6 and 10 of the Habitats Directive.
SEO B2	To avoid significant adverse impacts, including direct, cumulative and indirect impacts, to relevant habitats, geological features, species or their sustaining resources in designated ecological sites such as Poulaphouca Reservoir pNHA and SPA by development adjacent to this site.
SEO B3	To ensure compliance with Article 10 of the Habitats Directive with regard to the management of features of the landscape – by sustaining, enhancing or - where relevant - preventing the loss of ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity
SEO HH1	To protect human health from hazards or nuisances arising from exposure to incompatible land uses in particular from the re-use of brown field lands in areas where previous uses may have contaminated lands such as existing quarry lands.
SEO R1	Maximise the sustainable re-use of brownfield lands, and maximise the use of the existing built environment rather than developing greenfield lands
SEO S1	To prevent pollution and/or contamination of soil within the plan area of Blessington.

SEO Code W-S	To maintain and improve, where possible, the quality of Streams, Rivers, Lakes and other surface waters within and adjoining the plan area of Blessington.
Indicators W-S(2)	Poor, Sufficient, Good and Excellent classifications of bathing water as set by Directive 2006/7/EC
SEO Code W- G	To prevent pollution and contamination of ground waters
SEO Code W-F	To prevent development on lands which pose - or are likely to pose in the future - a significant flood risk
SEO Code WW	To serve new development with appropriate waste water treatment
SEO Code DW	To serve development within the Plan area with drinking water that is both wholesome and clean
SEO ode AQ1	To reduce travel related greenhouse emissions to air
SEO	To reduce car dependency within the plan area by way of, inter alia, encouraging
Code AQ2:	modal change from car to more sustainable forms of public transport and encouraging development which will not be dependent on private transport
SEO Code AH1	To protect the archaeological heritage of Blessington including entries to the Record of Monuments and Places — and the context of the above within the surrounding landscape where relevant
SEO Code AH2	To preserve and protect the special interest and character of Blessingtons architectural heritage including entries to the Record of Protected Structures, and their context within the surrounding landscape where relevant
SEO Code L1	To protect and avoid significant adverse impacts on the landscape of Blessington including landscape features such as the Lake Shore and Glen Ding Wood.

# Table 4.2: Strategic Environmental Objectives<sup>1</sup>

<sup>&</sup>lt;sup>1</sup> Strategic Environmental Objectives (SEOs) are methodological measures, which are developed from international and national policies which generally govern environmental protection objectives and against which the environmental effects of the Plan were tested. The SEOs are used as standards against which the provisions of the Plan were evaluated in order to help identify areas in which significant adverse impacts are likely to occur, if unmitigated against.



# 4.3 Evaluation of Plan Scenarios<sup>2</sup>

# 4.3.1.2 Introduction

This section summarises where each development scenario is likely to give rise to environmental impacts within the plan area. Each scenario as set out above in section 4.2 was overlaid on top of the above baseline sensitivity map in figure 4.4 in order to identify the most likely environmental impacts each varying scenario would have on the plan areas receiving environment.

# 4.3.2.2 Alternative Scenario 1 – Minimal Development Envelope

# ⇒ Likely Environmental Effects

This plan scenario has the least environmental impact – with no new large-scale development being permitted until such time as adequate wastewater treatment infrastructure is in place. The scenario provides for extensive buffers along the lakeshore c. 200m, Poulaphuca SPA and pNHA, a strong recognition of the findings of the Local Biodiversity Study carried out, a strong protection and expansion of Glen Ding Wood. Strict adherence to the provisions of the Flood Management Guidelines is also provided for.

The resultant settlement pattern is tightly concentrated around the existing town centre promoting sustainable patterns of mobility with new zonings also being accompanied by strong environmental objectives.

# 4.3.2.3 Alternative Scenario 2 – Moderate Development Envelope

# Likely Environmental Effects

This plan scenario bears similarities to Scenario 1 however provides for a more expansive plan area recognising the extent of existing quarrying permissions obtained by Roadstone, by reducing the protection buffer along the lakeshore from 200m to 100m and providing for lower order uses within the 100-200m zone from the lakeshore in the form of Active Open Space lands. The provision of such spaces while making use of existing agricultural lands facilitates the expansion of the sporting and open space needs of the town while also protecting the natural environment of these areas and providing a further buffer from further residential and employment development.

This scenario provides for a relatively compact layout with the exception of the appearance of the extensive employment zoning to the north west of the plan area. While the appearance of this zone may seem quite large the provisions of this employment zoning only allow for development at a plot ratio of 0.1 with the remaining lands being development as open space and amenity parkland capable of providing connectivity to Glen Ding Wood and maintaining the existing Local Biodiversity areas and linkages in this area.

Failure to provide waste water treatment infrastructure and capacity in line with population growth would be likely to result in significant adverse impacts upon surface waters at risk of not meeting objectives under the Water Framework directive, thereby impacting upon biodiversity and flora, fauna and upon human health. This plan scenario also has a strict policy of no new large-scale development being permitted until such time as adequate wastewater treatment infrastructure is in place.

<sup>&</sup>lt;sup>2</sup> Footnotes like this are used in this section in order to identify instances where interactions between the relevant Scenario and the relevant SEOs occur. The nature of these interactions is identified on Table 7.2 of the ER.

# 4.3.2.4 Alternative Scenario 3 – Maximum Development Envelope

#### Likely Environmental Effects

This scenario provides for a significant development for residential and tourism purposes along the lakeshore in close proximity to the designated SPA and pNHA. This scenario has little recognition of the Local Biodiversity areas identified in the Biodiversity study carried out and also facilitates an expansion of quarrying activities into Glen Ding Wood with a minimalist approach towards protecting the listed national monuments located in this area.

The provision of single one off housing along the lakeshore is also a feature of this scenario maximising the scenic value of the lakeshore and views of the Wicklow Mountains. Little or no protection is provided for the identified water and wildlife corridors as set out in the Local Biodiversity mapping and the provision of significant residential, employment development is prioritised over the locating of community and open space needs of the plan area.

As is the case with Scenario 1 and Scenario 2, failure to provide waste water treatment infrastructure and capacity in line with population growth would be likely to result in significant adverse impacts upon surface waters already at significant risk of not meeting objectives under the Water Framework development, upon biodiversity and flora and fauna and upon human health.

# 4.3.2.5 Evaluation against SEOs

**Table 4.3** below provides an evaluation of each of the alternative development scenarios for the Draft Plan against the Strategic Environmental Objectives (SEOs).

	Likely to Improve status of SEOs	Probable Conflict with status of SEOs unlikely to be mitigated	Potential Conflict with status of SEOs- likely to be mitigated	No Likely interaction with status of SEOs
Scenario 1	<ul> <li>B1, B2, B3, HH1, R1, W-S, W-G, W-F, WW,</li> <li>DW, AH1, AH2, L1 (Protection of various environmental components resulting from minimising greenfield development).</li> <li>AQ1, AQ2, (reducing travel emissions, energy usage and encouraging sustainable mobility)</li> <li>WW, (strictly no development unless adequate WWT in place)</li> </ul>		<ul> <li>AH1, AH2 (Consolidation of existing town centre may conflict with Archaeological and Architectural Heritage),</li> <li>HH1, (Regeneration of potentially contaminated lands within the Employment/former quarry zone)</li> <li>B1, B2, B3, R1, W-S, W-G, W-F, WW, DW, L1 (Conflicts with various environmental components and projects will have to be mitigated)</li> </ul>	
Scenario 2	<ul> <li>B1, B2, B3 (strict protection of cSPA &amp; pNHA and ecological corridors)</li> <li>WW, (strictly no development unless adequate WWT in place)</li> <li>HH1, R1, W-S, W-G, W-F, DW, AH1, AH2, L1 (Protection of various environmental components resulting from minimising greenfield development).</li> </ul>	boundary will lead to increases in travel	AH2 (Reduced protection of various environmental components resulting from	
Scenario 3		AQ1, AQ2, (Expansion of development boundary will lead to increases in travel related emissions, energy usage) B2, B3, L1 (reduced protection of cSPA and pNHA and due to direct impacts as a result of greenfield development) WW, (allowance for individual WWTP to serve new developments)	(Reduced protection of various environmental components resulting from increasing	

# 4.4. Reasons for choosing the Plan in light of the other reasonable alternatives dealt with

#### The measurements indicate the following:

- ⇒ Scenario three would be likely to result in more adverse environmental impacts than each of the other two Scenarios.
- ⇒ If mitigated, Scenarios 1 and 2 would be likely to result in a lesser frequency and magnitude of impacts than Scenario 3.
- ⇒ Scenario 3 is the scenario with the greatest amount of high and acute vulnerability areas covered by development pressure areas and the only scenario for which extremely vulnerable areas are covered by development pressure areas.

#### The preferred Alternative:

On the basis of the above analysis Scenario 1 would be likely to improve the status of a number of the SEOs and emerges as the most environmentally sustainable option. If unmitigated, Scenarios 2 and 3 would be likely to result in a number of adverse environmental impacts. Having regard to planning considerations, Scenario 2 provides a better balance between environmental protection and economic and social development and therefore provides for the most overall sustainable option. Under Scenario 2, potential conflicts with environmental objectives can largely be offset by appropriate mitigation measures.

The key areas identified as requiring mitigation relate to lands adjoining the lakeshore, lands zoned for Quarrying and Employment to the north of west of the plan, the existing ecological corridors formed by the Blessington Stream, Local Biodiversity Areas within the plan area, the town centre area which includes the Architectural Conservation Area and the existing protected buildings structures and monuments within this area.

*The Local Area Plan for Blessington:* The Local Area Plan that has emerged from the Plan preparation corresponds most closely to Scenario 2.

## Section 5 Monitoring Measures

## 5.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section and section 10 of the environmental report puts forward proposals for monitoring the Local Area Plan, which are adopted alongside the Local Area Plan. Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action.

In addition to this, monitoring can also play an important role in assessing whether the LAP is achieving its environmental objectives and targets - measures which the LAP can help work towards - whether these need to be re-examined and whether the proposed mitigation measures are being implemented.

#### 5. 2 Indicators and Targets

Monitoring is based around the indicators, which were chosen earlier in the process. These indicators allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives used in the evaluation. Focus will be given to indicators which are relevant to the likely significant environmental effects of implementing the Local Area Plan and primarily to existing monitoring arrangements in order to monitor the selected indicators. Each indicator to be monitored will be accompanied by the relevant target(s) - measures which the Local Area Plan can help work towards - which were identified with regard to the relevant legislation. The table below shows the indicators and targets, which have been selected with regard to the monitoring of the plan.

#### 5.3 Sources

In compliance with the SEA Directive and the DECLG Guidelines, measurements for indicators come from existing monitoring sources and no new monitoring should be required to take place. Existing monitoring sources exist for many of the indicators and include those maintained by Wicklow County Council and the relevant authorities e.g. the Environmental Protection Agency, the National Parks and Wildlife Service and the Central Statistics Office.

The Development Management Process in Wicklow County Council will provide additional monitoring of certain indicators and targets on an application-by-application basis. Where significant adverse effects - including positive, negative, cumulative and indirect - are likely to occur upon, for example, entries to the Record Monuments and Places, entries to the Record of Protected Structures or ecological networks as a result of the undertaking of individual projects or multiple individual projects such instances will be identified and recorded and will feed into the monitoring evaluation.

#### 5.4 Excluded Indicators and Targets

As noted on Table 5.1 below, future-monitoring data for Indicators AQ1 (Percentage of population within the County travelling to work or school by public transport or non-mechanical means) and AQ2 (Average distance travelled to work or school by the population of the County) will be based around data from the results of the 2011 CSO Census POWCAR data. It is recommended that this recently published data be used as a baseline indicator for the SEA of the next review of the Plan.

# 5.5 Reporting

The ongoing monitoring of the Blessington Local Area Plan and its implications on the environment is paramount to ensure that the environment of the Plan area and zone of influence is not adversely affected by the implementation of the Plan.

# 5.6 Responsibility

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

# 5.7 Thresholds

Thresholds at which corrective action will be considered are as follows:

- $\Rightarrow$  Boil notices on drinking water;
- $\Rightarrow$  Fish kills;
- ⇒ Court cases taken by the DEHLG regarding impacts upon archaeological heritage including entries to the Record of Monuments and Places; and,
- ⇒ Complaints received from statutory consultees regarding avoidable impacts resulting from development, which is granted permission under the plan.

# Table 5.1 Monitoring Measures

Environmental Component	Selected Indicator(s)	Selected Target(s)	Sources
Biodiversity Flora and Fauna	<b>B1</b> : Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive		Designated ecological sites mapping, CORINE Mapping, National Parks and Wildlife Service Records & Development Management Process in Wicklow County Council.
	<b>B2:</b> Number of significant adverse impacts, including direct, cumulative and indirect impacts, to relevant habitats, geological features, species or their sustaining resources in designated ecological sites by development within or adjacent to these sites as a result of implementation of the LAP	including direct, cumulative and indirect impacts, to relevant habitats, geological features, species or their sustaining resources in designated ecological sites by	Designated ecological sites mapping, Development Management Process Wicklow County Council & Consultation with the National Parks and Wildlife Service.
	<b>B3:</b> Percentage of relevant habitats and designated ecological sites lost as a result of implementation of the LAP		Primary ecological corridors mapping, CORINE mapping and Development Management Process in Wicklow County Council.
Population and Human Health	<b>HH1:</b> Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors as identified by the Health Service Executive (HSE) and Environmental Protection Agency (EPA)	problems arising from environmental factors	Wicklow County Council, EPA <sup>1</sup> , HSA

<sup>1</sup> Environmental Protection Agency

	<b>R1:</b> Area of brownfield lands developed over the Local Area Plan's lifespan	<b>R1:</b> Reduced availability of brownfield land (subject to availability on the open market, the demand for such land and the ability for such lands to be sustainably re-used) at the end of the Local Area Plan's lifespan	Development Management Process of Wicklow County Council.
Water	WS1: Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009)	0,	EPA
	<b>WS2:</b> Poor, Sufficient, Good and Excellent classifications of bathing water as set by Directive 2006/7/EC		EPA
	<b>WG1:</b> Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	<b>WG1:</b> Compliance with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	EPA
	<b>WF:</b> Number of developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk	<b>WF:</b> Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk in compliance with <i>The Planning System and Flood Risk Management</i>	Process of Wicklow County Council.

<sup>&</sup>lt;sup>2</sup> Good status as defined by the WFD equates to approximately the following in the current national schemes of classification as set out by the EPA

<sup>•</sup> *Q4* in the biological classification of *rivers*;

<sup>•</sup> *Mesotrophic* in the classification of *lakes*; and,

<sup>•</sup> Unpolluted status in the Assessment of Trophic Status of Estuaries and Bays in Ireland (ATSEBI).

		Guidelines for Planning Authorities	
Material Assets	Waste Water Infrastructure		
	<b>WW1:</b> Number of new developments granted permission which can be adequately served with waste water treatment over the lifetime of the Plan		Development Management Process of Wicklow County Council.
	<b>WW2:</b> Preparation of a Water Services Strategic Plan - in compliance with the Water Services Act - for Blessington		Wicklow County Council
	Drinking Water Quality DW1: Number of non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health	<b>DW1:</b> No non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health as a result of implementing the Plan	EPA, EPA Remedial Action List and the Council.
	<b>DW2:</b> Preparation of a Water Services Strategic Plan - in compliance with the Water Services Act - for the functional area of the Council	Services Strategic Plan in compliance with the Water Services Act	Wicklow County Council
Air and Climatic Factors	<b>AQ1:</b> Percentage of population within the Town travelling to work or school by public transport or non-mechanical means	<b>AQ1:</b> An increase in the percentage of the population travelling to work or school by public transport or non-mechanical means	Central Statistics Office
	AQ2: Average distance travelled to work or school by the population of the Town	AQ2: A decrease in the average distance travelled to work or school by the population of the Town	

Archaeological Heritage		
Monuments and Places - including Zones of	Monuments and Places - including Zones of	Development Management/ Enforcement Process in the Council; Complaints from statutory consultees.
5		
<b>AH2B:</b> Number of additions to the Record of Protected Structures and the number of additional ACAs	<b>AH2B:</b> Make Additions to the Record of Protected Structures and make additional ACAs, where appropriate	Wicklow County Council.
		Development Management/ Enforcement Process in the Council; Complaints from statutory consultees
	<ul> <li>AH1: Percentage of entries to the Record of Monuments and Places - including Zones of Archaeological Potential - (and their context of the above within the surrounding landscape where relevant) protected</li> <li>Architectural Heritage</li> <li>AH2: Percentage of entries to the Record of Protected Structures (and/or their context within the surrounding landscape where relevant) protected</li> <li>AH2B: Number of additions to the Record of Protected Structures and the number of additional ACAs</li> <li>L1: Number of complaints received from statutory consultees regarding avoidable impacts on the landscape resulting from development which is granted permission under</li> </ul>	<ul> <li>AH1: Percentage of entries to the Record of Monuments and Places - including Zones of Archaeological Potential - (and their context of the above within the surrounding landscape where relevant) protected</li> <li>AH2: Percentage of entries to the Record of Protected Structures (and/or their context within the surrounding landscape where relevant)</li> <li>AH2: Percentage of entries to the Record of Protected Structures (and/or their context within the surrounding landscape where relevant)</li> <li>AH2: Percentage of entries to the Record of Protected Structures (and/or their context within the surrounding landscape where relevant)</li> <li>AH2B: Number of additions to the Record of Protected Structures and the number of additional ACAs</li> <li>L1: Number of complaints received from statutory consultees regarding avoidable impacts on the landscape resulting from development which is granted permission under</li> </ul>