

SEA Statement

OF THE

KILLARNEY MUNICIPAL DISTRICT LOCAL AREA PLAN 2018-2024

AND THE

FOURTH VARIATION to the KILLARNEY TOWN DEVELOPMENT PLAN 2009-2015 (as extended)

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1 INTRODUCTION

1.1 Terms of Reference

Originating from the Local Government Reform Act 2014 the electoral structure of County Kerry now consists of four Municipal Districts (MDs) – Killarney, Tralee, Listowel and South West Kerry. The three former town councils of Tralee, Listowel and Killarney were abolished. Kerry County Council (KCC) as a Planning Authority (PA) has now a duty to make a Municipal District Local Area Plan (MD LAP) for each district. This is in accordance with the requirements and provisions of the Planning and Development Act 2000 (as amended).

KCC has now drafted the Killarney Municipal District Local Area Plan (Killarney MD LAP). The main settlements of the Killarney MD LAP are listed below.

Hub Town	Killarney
District Towns	Castleisland
Villages	Barraduff, Farranfore, Fieries, Kilcummin, Rathmore
Small Villages	Fossa, Gneeveguilla, Scartaglin
Development Nodes	Cordal, Currow

The area includes the former Killarney Town Council administrative area. Running concurrently with the MD LAP was the fourth variation to the Killarney Town Development Plan 2009-2015 (KTDP) (as extended).

The planning making process commenced in December 2016 when notice, pursuant to Section 20(1) of the Planning & Development Act 2000 (as amended) was given that KCC as the PA had commenced the process of preparing a LAP for the Killarney MD and a proposed Fourth variation to the KTDP 2009-2015.

Following the plan making process which commenced in December 2016 both plans were adopted on the 17th of December 2018. The MD LAP became effective 4 weeks after the adoption date whilst the variation was effective immediately post-adoption by elected members. Both plans will last for 6 years until 2024.

As part of the above plan making processes a SEA was undertaken of both the Killarney MD LAP/4th variation to the KTDP 2009-2015. A SEA is a systematic evaluation of the likely significant effects of implementing a Plan or Programme (P/P) before it is adopted. Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment was transposed into Irish law under:

- European Communities (Environmental Assessment of Certain Plans and Programmes (Amendment) Regulations 2011, (S.I. No. 200 of 2011), amending the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2001 (S.I. No. 435 of 2004),
- Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (S.I. No 201 of 2011) and Planning and Development (Amendment) Regulations 2011 SI 262 of 2011, amending the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No.436 of 2004).

The SEA process consists of a series of steps or stages that need to be undertaken. These are:

- **Screening** of P/P to establish whether it must undergo an SEA;
- **Scoping** of the details to be provided in the Environmental Report (ER), in consultation with environmental authorities;
- **An Environmental Report** - containing the findings of the assessment on the likely significant effects on the environment of the P/P;
- **Consultation** on the draft plan and associated Environmental Report (ER);
- **An SEA Statement** - identifying how environmental considerations and consultations have been integrated into the Final Plan; and
- **Monitoring Programme** of the significant environmental effects of the P/P

This report deals with step 5 of the above process, the SEA Statement of the SEA for the Killarney MD LAP/4th variation to the KTDP 2009-2015, hereafter called the plan. It should be noted that the plan also underwent an Appropriate Assessment under Article 6 of Habitats Directive, in parallel with the SEA process. A Strategic Flood Risk Assessment (SFRA) was also undertaken concurrent with the plan making process.

1.2 Overview of the Draft Killarney MD LAP and Fourth Variation to the Killarney Town Development Plan 2009-2015 (as extended) and SEA process

The drafting of the Killarney MD LAP/4th variation to the KTDP 2009-2015 commenced in December 2016. The SEA of both plans commenced at the same time with a formal scoping report being issued to consultees in April 2017. As the plans progressed the SEA, as an iterative process, informed both land use documents. Both plans and the Environmental Report (ER) of the SEA were also informed by an Appropriate Assessment (AA) under Article 6 of the Habitats Directive and a Strategic Flood Risk Assessment (SFRA).

The draft plan, ER, NIR and SFRA were placed on public display from 3rd May to 15th June 2018 (both dates inclusive). An open day for members of the public were held in the Killarney Library on the 24th May 2018. Submissions received within the time periods outlined above were read, categorised and summarised together with the Chief Executives Response and Recommendation(s). These submissions and recommendations were subsequently outlined in two Chief Executive Reports (CERs) – *Chief Executive's report on submissions on the proposed variation no. 4 to the Killarney Town Development Plan 2009-2015* and *Chief Executive's report on submissions on the draft Killarney MD LAP 2015-2021*. Both CERs were issued to the Elected Members in September 2018. The CERs included recommendations on material alterations to the Killarney MD LAP/ 4th variation following submissions received. Material alterations, as proposed, were consequently adopted on the 17th of September 2018. The proposed material alterations were then environmentally assessed and presented in addenda to the SEA ER, NIR and SFRA.

The proposed material alterations and environmental addenda were subsequently placed on public display from Thursday 4th October and Monday 5th November 2018. A total of 19 no. submissions on the proposed material alterations were received during this second consultation period, 7 on the MD plan and 12 on the variation to the Killarney TDP. Two CERs were again produced that outlined the Chief Executives Response and Recommendation(s). The CERs were considered by the Elected Members at a meeting held on December 17th, 2018. Modifications to the material alterations were agreed by the Elected Members at that meeting.

These modifications to material alterations are assessed in this report as part of the ongoing SEA of both plans. This is to ensure that the modifications made to material alterations at the plan adoption phase are assessed for possible significant effects on the environment.

1.3 Final Stage of the SEA - the SEA Statement

This document (the SEA Statement) of the Killarney MD LAP/4th variation to the KTDP 2009-2015 (as extended) forms the final stage of the requirements for the Strategic Environmental Assessment (SEA). It is prepared in conjunction with the final adopted plans. A SEA Statement is a requirement of the Planning and Development Regs, 2001 (as amended) which set out (Article 13Q/14I) the information to be included in a SEA Statement. These requirements are discussed in the following section. It should be noted that this SEA Statement is written in parallel with a Natura Impact Report Conclusion Report and Strategic Flood Risk Assessment (SFRA). The interaction between the SEA, AA and SFRA and the Planning Policy Unit in Kerry County Council in preparing the draft plan is shown in Table 1.

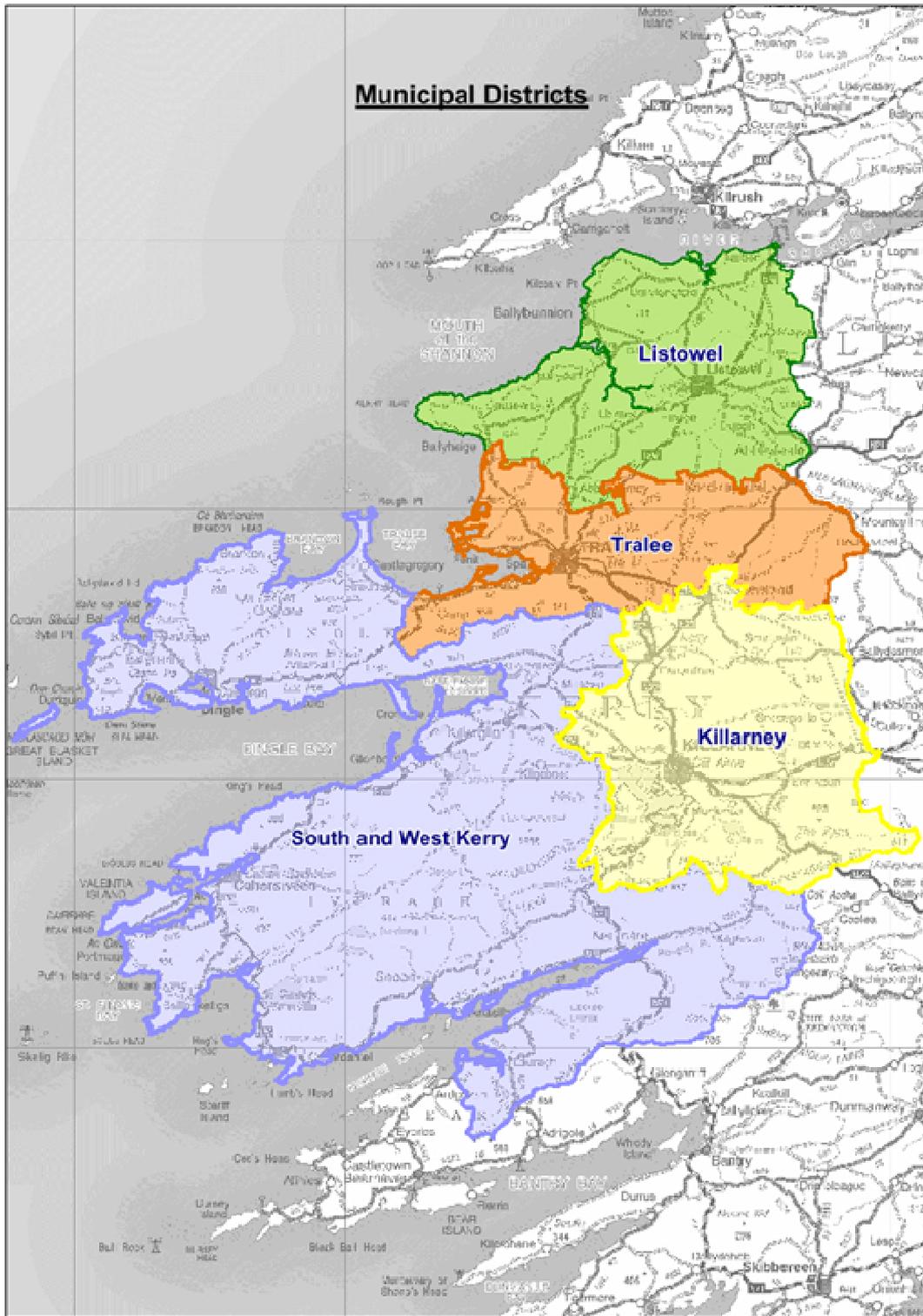


Figure 1-1 Killarney Municipal District Local Area Plan area within County Kerry

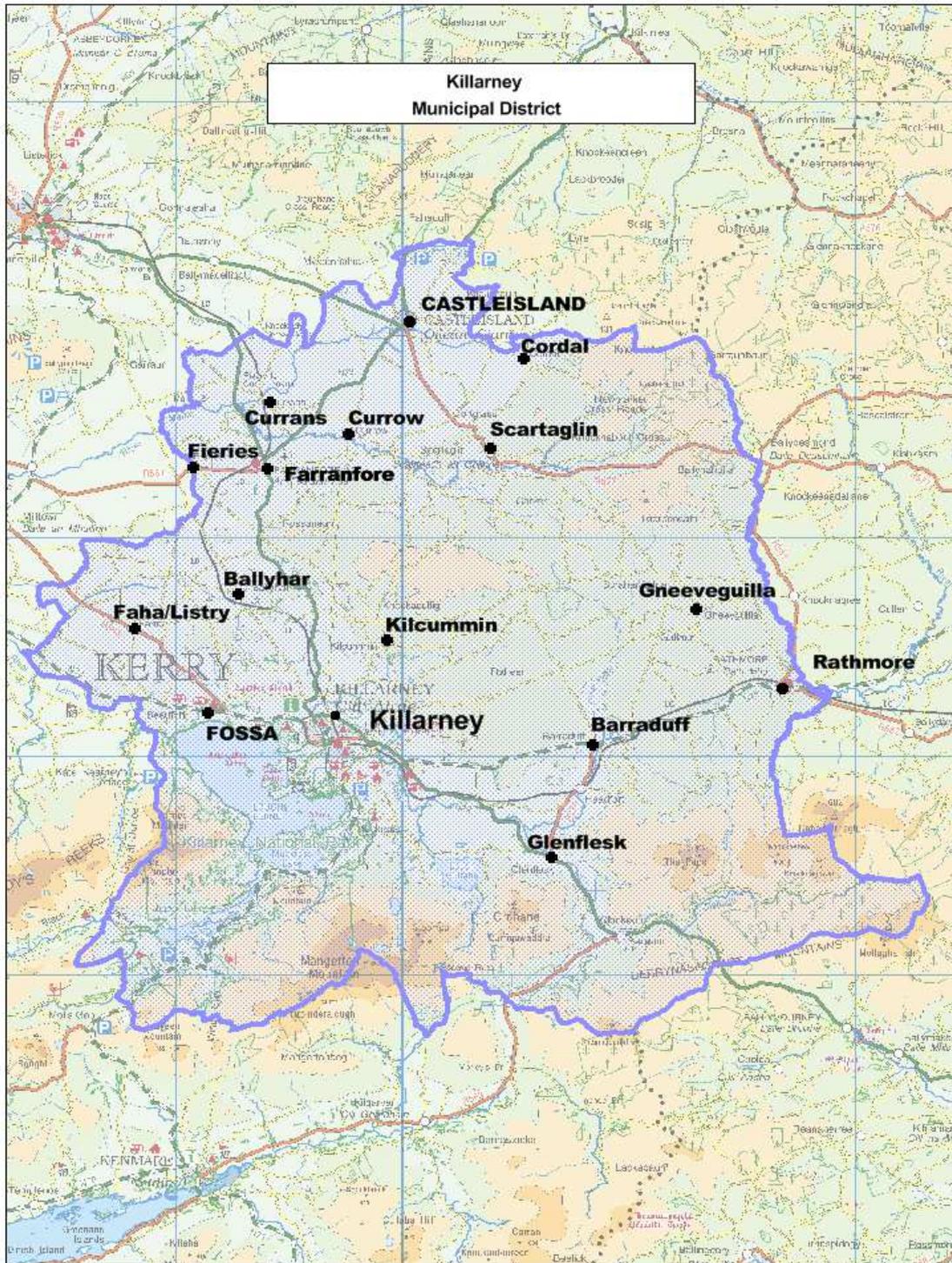


Figure 1-2 Killarney Municipal District Local Area Plan area showing main settlements/development nodes

Table 1 Interaction between the plan, SEA, SFRA and AA

STAGES IN PLAN MAKING PROCESS	PLAN	SEA	SFRA	AA
Pre-review	Preparation of Issues Papers	SEA mandatory screening not applicable	-	-
Initial public consultation	Publication of (a) statutory notice of intention to make MD LAP/4th variation	Scoping of the Environmental Report, in consultation with environmental authorities noting SFRA to be undertaken		Notify consultees that an assessment under Art 6 will be undertaken
Preparation of Documentation	Preparation of draft plan	Preparation of Environmental Report. The process is iterative, amendments made to the plan by SEA where required, and record made of same	Inform plan making process, will be iterative	An AA drafted in parallel with SEA and Plan. The process is iterative, amendments will be made to the plan where required, and record made of same
Public consultation	Public display of draft plan and consideration of submissions	Public display of ER/SFRA and consideration of submissions		Public display AA and consideration of submissions
2nd public display (if required)	Display of any material amendment(s) to draft plan	Any significant environmental effects resulting from material amendments identified		Any significant effects/ adverse effects on the site integrity on European sites resulting from material amendments identified
Completion of process	Adoption of plan	Making specified information available in the form of a SEA Statement	Finalise SFRA	Provide information on the AA
Post-plan Adoption	Implementation	Monitoring of significant environmental effects		Monitoring, if required/appropriate

1.4 Content of the SEA Statement

The SEA Statement is required, under Article 13Q/14I of the Planning & Development Regs, 2001 (as amended), to include information summarising: -

- a) how environmental considerations have been integrated into the plan/variation and
- b) how
 - i. The ER prepared pursuant to article 13L/14B
 - ii. any submission or observation made to the planning authority in response to a notice under Section 20(3) and/or Section 13(2) of the act, and
 - iii. any consultations under article 14F/13QHave been taken into account during the preparation or amendment of the plan/variation
- c) The reasons for choosing the plan/variation, as adopted, in light of the other reasonable alternatives dealt with, and
- d) The measures decided upon to monitor, in accordance with Article 14J/13R, the significant environmental effects of implementation of the plan/variation or amended plan

Each of these individual criteria will be addressed in separate sections of this SEA Statement.

2 INCORPORATION OF ENVIRONMENTAL ISSUES INTO THE PLAN

2.1 Introduction

The SEA process can be broken down into a number of steps that ran parallel to the writing of the Killarney MD LAP/4th variation to the KTDP 2009-2015. At each stage of the process the impacts of the draft plan on the environment and the public is assessed. The SEA was also informed by an AA and SFRA which ran parallel with the drafting of Killarney MD LAP/4th variation to the KTDP 2009-2015.

In undertaking the SEA, where it was assessed that the draft plan may conflict with the environmental objectives (EOs) then mitigation measures were proposed. The mitigation measures predominately entailed amendments to or the addition of an objective/policy in the plan; the addition of explanatory text or relied on existing policies/objectives of the hierarchical plans.

The draft plan was assessed during the following phases: -

- Scoping – consultation with the statutory consultees and non-statutory consultees
- Evaluation of draft objectives, policies and land use maps (included in environmental report)
- Evaluation of proposed material alterations to draft plan after consultation, and
- Evaluation of any modifications proposed to material alterations after second consultation phase, and
- Following adoption of the plan any further modifications made during the adoption of the plan.

2.1.1 Scoping

Scoping for the SEA was carried out in April 2017. The scoping report outlines the procedures undertaken in the preparation of the report and how it was prepared in parallel with the draft plan. The scoping process also discussed possible alternatives, environmental objectives, targets, indicators and monitoring arrangements. The overall outcome of the scoping process was to focus attention and resources on the most important environmental issues as a result of implementing the draft plan.

2.1.2 Evaluation of Draft Killarney MD LAP/4th variation to the KTDP 2009-2015 – Objectives, Policies and Land Use

Chapter 3 of the ER outlines the methodology of preparing the draft plan and the Environmental Report. The ER evaluated the likely significant impacts of implementing the draft plan on the environment using and augmenting the baseline environmental data collected during the scoping process. As stated above the purpose of the ER was to assess the likely significant effects of the plan on the environment and to ensure that any significant impacts are considered during the preparation of the draft plan. This was undertaken by assessing the objectives, policies and land use zonings against the Environmental Objectives (EOs) in the ER. The EOs set out in Chapter 6 of the ER and further in the associated SEA addendum, are described under a range of topics. They are used as the standards against which the future development objectives of the Plan can be evaluated.

The ER also considered a number of alternatives. These alternatives were assessed, and a preferred strategy chosen. This is further discussed in Section 4 of this SEA Statement.

The ER also outlined mitigation measures to remedy/reduce any potential significant impacts and a monitoring programme was developed to assess any impacts of the draft plan on the environment. The monitoring programme is outlined in Section 5 of the SEA Statement.

2.1.3 Evaluation of proposed material alterations to draft Killarney MD LAP/4th variation to the KTDP 2009-2015

Once drafted the Killarney MD LAP/ 4th variation, ER, NIR and SFRA were placed on public display from 3rd May to 15th June 2018 (both dates inclusive). An open day for members of the public were held in the Killarney Library on the 24th May 2018. Over this time period 104 submissions were received.

As a result of the consultation material alterations (MA) were made to both the Killarney MD LAP/ 4th variation as presented in two CERs to Elected Members in September, 2018. These MAs were subsequently adopted by Elected Members on September 17th, 2018. The proposed material alterations were then assessed against environmental objectives created as part of the SEA process to assess if significant effects on the environment were likely. Material alterations were also screened as part of the SFRA and NIR.

The findings of these three environmental assessments are provided in reports prepared by Kerry County Council in July 2018, including the *SEA Environmental Report Addendum of the Killarney MD LAP/ 4th variation* and the *Natura Impact Report of the proposed Material Alterations to the Killarney MD LAP/ 4th variation*.

In relation to the material alterations of the Killarney MD LAP, possible significant effects were identified for several material alterations, but all were mitigated by existing policies and/or objectives within the plan itself or hierarchical plans.

In relation to the fourth variation to the KTDP, two specific material alterations (27 and 28) were highlighted as having possible significant effects on the environment/European sites. Both amendments proposed changes to zonings on the outskirts of Killarney town.

Amendment 27 related to the proposed re-zoning of lands located off the N22 from G3 to C6, *Mixed/general commercial/Industrial/Enterprise* (see Map 9 in the CER report). The habitat at this location was identified in the appropriate assessment of the material alteration as functional habitat associated with Lesser Horseshoe bats roosting in Killarney National Park, Macgillycuddy Reeks and Caragh River Catchment cSAC. In addition, the SEA noted possible traffic and landscape impacts from the re-zoning. Mitigation was proposed for amendment 27 through the appropriate assessment/SEA of the material alteration namely via the inclusion of two new objectives KY-PK-1 and 2, associated with the zoning – see below.

Objective No:	It is an objective of the Council to;
KY-PK-1.	Ensure that a Natura Impact Statement, incorporating a Lesser Horseshoe Bat survey and impact assessment is required to be undertaken by a suitably qualified individual, in support of any development proposal for the lands in question. Proposals which would either directly or indirectly result in the loss of functionally linked habitat of importance to the Killarney National Park McGillycuddy Reeks and Caragh River Catchment SAC will not be permitted

KY-PK-2	<p>Ensure that any proposal to develop the site should include a:</p> <ul style="list-style-type: none"> • Landscape and visual impact assessments, • Traffic Impact Assessment addressing any impacts on the existing N22/Killarney by-pass from the proposed development, • An Ecological Impact Assessment, and • An assessment under Article 6 of the Habitats Directive as outlined in Objective no KY-PK-1.
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Possible significant effects on the environment from amendment 28 were recorded in the SEA of the material alterations. Amendment 28 relates to the proposed re-zoning of lands also located off the N22 from *G3* to *R4*, *Strategic Residential Reserve* (see Map 10 in the CER report). The lands that were proposed for zoning were identified in the SEA as annexed woodland habitat located outside a European site. Other environmental constraints recorded in the SEA for this material alteration included possible traffic and landscape impacts from the proposed re-zoning. The SEA recommended that the lands retain their original *G3* zoning.

Further to the display of the material alterations, associated SEA ER and NIR addenda discussed above, an additional 19 no. submissions were received. This followed a second public display period that ran from Thursday 4th October and Monday 5th November 2018. Proposed modifications to the material alterations were compiled in two additional CERs presented to Elected Members in a meeting held on December 17th, 2018.

In relation to the Killarney MD Plan, material alterations were adopted including three additional modifications made during the meeting. These three modifications to the material alterations adopted by Elected Members during this December meeting are assessed below in Table 2.2. This is to ensure that the final modifications made to the plan are assessed for possible significant effects on the environment. None were identified.

The MD plan were subsequently adopted on December 17th, 2018 and is effective from 4 weeks of its adoption date.

In relation to the forth variation to the Killarney TDP, all material alterations proposed were adopted by Elected Members during this December meeting and no modifications were made during the meeting. Material alteration described in the CER as amendment 28 and which related to the proposed zoning of annexed habitat with traffic and landscape constraints was zoned *R1 – proposed new residential*. This was against the recommendation of the SEA Addendum Report.

The variation to the KTDP 2009-2015 as extended became effective immediately.

2.2 Screening of modifications made to Material Alterations (MA) of the Killarney MD LAP 2018-2024

The following table present the screening for significant effects of modifications made to material alterations (MAs) to the Killarney MD LAP. A modification to a MA that is deemed likely to have a significant effect is highlighted in red text.

Modification to Material Alterations (MA)	LIKELY SIGNIFICANT EFFECTS
<p>Note that the list of proposed amendments below to the Draft Plan, changes are shown as deletions (strikethrough) and additions (bold).</p> <p>Modification 1; A buffer-zone area along the riverbank as identified on Map 1 be zoned G3 landscape protection.</p>	<p>This modification is proposed further to a submission by the Dept of Culture, Heritage and the Gaeltacht & IFI and relates to the protection of riparian habitat along the Flesk. The strip of land is partly located within the Killarney National Park, Macgillycuddy Reeks and Caragh Catchment cSAC and provides a natural buffer and ecological corridor for the movement of species. It also forms an attractive landscape feature visible from the Mill Road. A G3 landscape protection zoning at this location would link with G3 zonings to the northwest and southeast thereby creating a continuity of such zonings along the riverbank. It is considered that this would be in accordance with the proper planning and sustainable development of the area.</p> <p>No likely significant effects on the environment identified.</p>
<p>Modification 2; Include the following objective in section 2.4; Water Infrastructure Objective It is an objective of the Council to; KY-W-02 Facilitate and support all current and future water service plans and projects including;</p> <ul style="list-style-type: none"> • Mid Kerry WSS • Central Kerry Regional water supply scheme • Castleisland WWTP • Kilcummin Wastewater network • County Kerry Water conservation • Kerry water conservation mains rehabilitation <p>which are necessary for supporting development in the Municipal District.</p>	<p>These modifications relate to the addition of text that supports the roll out of water infrastructure that will support development in the MD. Ultimately the provision of infrastructure is the responsibility of Irish Water. Irish Water in the provision of water infrastructure will be subject to proper planning and sustainable development including compliance with the Habitats, EIA and Water Framework Directives.</p> <p>No likely significant effects on the environment identified.</p>

Modification to Material Alterations (MA) Note that the list of proposed amendments below to the Draft Plan, changes are shown as deletions (striketrough) and additions (bold).	LIKELY SIGNIFICANT EFFECTS
Modification 3 The following text will be added to Section 24: Kerry County Council will facilitate the repair and reinstatement by Irish Water of all roads and footpaths following completion of works.	

3 INCORPORATION OF SUBMISSIONS AND CONSULTATIONS

3.1 Introduction

This section of the SEA statement details how submissions received during the SEA process and draft plan process were considered during preparation of the Killarney MD LAP/ 4th variation to the KTDP. Three main phases of consultation occurred during the plan making/SEA process namely SEA scoping for the draft Killarney MD LAP/4th variation to the KTDP 2009-2015; public display of the draft Killarney MD LAP/4th variation to the KTDP 2009-2015 plans, ER, NIR and SFRA and finally the material alterations of the draft Killarney MD LAP/4th variation to the KTDP 2009-2015.

3.2 SEA Scoping Consultation

Designated environmental authorities were consulted in relation to the scope and level of detail to be included in the ER. In correspondence from the EPA¹, the following authorities were consulted:

- The Minister for the Environment, Community and Local Government (now the Minister for Housing, Planning, Community and Local Government)
- Minister for Agriculture, Food and the Marine, and the Minister for Communications Energy and Natural Resources (now the Minister for Communications, Climate Action and Environment), where it appears to the planning authority that the plan or programme, or modification of the plan or programme, might have significant effects on fisheries or the marine environment
- where it appears to the competent authority that the plan or programme, or amendment to a plan or programme, might have significant effects in relation to the architectural heritage or to nature conservation, the Minister for Arts, Heritage and the Gaeltacht (now the Minister for Culture, Heritage and Gaeltacht Affairs), and
- any adjoining planning authority whose area is continuous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan,

In addition

- Inland Fisheries Ireland, and
- Local Authority Waters and Communities Office (LAWCO).

Briefly, a copy of the SEA Scoping Report for the draft Killarney MD LAP/ 4th variation to the KTDP was sent to the above statutory and non-statutory bodies in April 2017. Submissions and comments were invited and received as outlined in Table 2 below. Further details are also provided in Section 3.2 of the ER.

¹ Letter from the EPA to the Planning Policy Unit of KCC dated 17th February 2017 further to notice given to the EPA under Section 20(1) of the Planning and Development Act, as amended.

Table 2 SEA Scoping Consultation Details

Consultee	Comments	Addressed
EPA	<ul style="list-style-type: none"> Biodiversity to be addressed including green infrastructure Critical service infrastructure to meet needs of the plan Water related considerations to be addressed Flood Risk to be considered Sustainable tourism to be promoted in the plan particularly in relation to Killarney National Park. Submission also provided Scoping Checklist and list of statutory consultees to be consulted.	Throughout the ER
Department of Housing, Planning, Community and Local Government	No response made	N/A
Department of Agriculture, Food and the Marine	Receipt of Scoping Report noted. No issues raised	N/A
Department of Communications, Climate Action and Environment	No response made	N/A
Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs	No response made	N/A
Cork County Council	No response made	N/A

3.3 Display of Draft Plans: First Public Consultation Phase

Once drafted the Killarney MD LAP/ 4th variation, SEA ER, NIR and SFRA were placed on public display from 3rd May to 15th June 2018 (both dates inclusive). An open day for members of the public were held in the Killarney Library on the 24th May 2018. Over this time 104 submissions were received. This constituted the first public display period. Several of these submissions related to the SEA process including a submission from the EPA.

These submissions were subsequently outlined in two Chief Executive Reports (CERs) – *Chief Executive’s report on submissions on the proposed variation no. 4 to the Killarney Town Development Plan 2009-2015* and *Chief Executive’s report on submissions on the draft Killarney MD LAP 2015-2021*. Both CERs were issued to the Elected Members of Kerry County Council in September 2018. The CERs included recommendations on proposed material alterations to the Killarney MD LAP/ 4th variation following submissions received.

Material alterations proposed were consequently adopted by Elected Members in September, 2018. Following this meeting it was determined that in accordance with the Planning and Development Act, as amended a Strategic Environmental Assessment and a Habitats Directive Assessment/Appropriate Assessment was required to be carried out on the material alterations.

The material alterations were subsequently assessed against environmental objectives created as part of the SEA process to assess if significant effects on the environment were likely. A record of the environmental assessments is contained in the *SEA Environmental Report Addendum of the Killarney MD LAP/ 4th variation* and the *Natura*

Impact Report of the proposed Material Alterations to the Killarney MD LAP/ 4th variation.

As outlined in Section 2.1.3 no significant effects were highlighted from the material alterations proposed to the Killarney MD plan. All material alterations could be mitigated by either a change in text, addition of new text and/or the existence of safeguards to protect the environment already stated within the draft plan.

However, two material alterations were recorded in the SEA and AA as potentially having a significant effect on the environment/European Sites - specifically, amendment 27 and 28 – see Section 2.1.3.

3.4 Material Alterations: Second Public Consultation Phase

Following the completion of the environmental assessments detailed above, proposed material alterations and addenda were put on public display from Thursday 4th October and Monday 5th November 2018. A total of 19 no. submissions on the proposed material alterations were received during this second consultation period, 7 on the MD plan and 12 on the variation to the Killarney TDP. One submission from the EPA related to the SEA.

Proposed modifications to the material alterations were compiled in two additional CERs presented to Elected Members in a meeting held on December 17th, 2018. The Elected Members adopted modifications to the material alterations following this meeting. The draft plan was subsequently adopted on December 17th, 2018. The variation to the KTDP 2009-2015 as extended became effective immediately while the Killarney MD LAP is effective from 4 weeks of its adoption date.

4 THE REASONS FOR CHOOSING THE PLAN AS ADOPTED, HAVING CONSIDERED ALTERNATIVES

4.1 Introduction

The development and assessment of alternatives (or options) is a legal requirement under the SEA Directive and plans and programme proponents should ensure that:

- Reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated (Article 5.1)
- The Environmental Report includes ‘an outline of the reasons for selecting the alternatives dealt with’ (Annex 1(h))
- A statement is prepared summarising ‘... the reasons for choosing the plan or programme as adopted, in the light of the reasonable alternatives dealt with’ (Article 9.1(b)).

Chapter 4 of the Environmental Report identifies and describes the different scenarios that were assessed in the drafting of the Killarney MD LAP/ 4th variation to the KTDP.

4.2 Description of Alternatives

As required by SEA, alternatives must be realistic (i.e. able to achieve the plan’s/programme’s objectives), reasonable (i.e. based on socio-economic and environmental evidence), viable (technically and financially feasible) and implementable (realisable within the plan’s/programme’s timeframe and resources). They should represent a range of different approaches within the statutory and operational requirements of a plan.

In drafting the Killarney MD LAP/ 4th variation to the KTDP it was important to recognise that reasonable, realistic alternatives that are capable of implementation are shaped by the position of both plans within the planning policy and decision-making hierarchy for land use planning. This is specifically outlined in Section 2 of the ER. In summary, for the Killarney MD LAP/ 4th variation to the KTDP the following considerations were taken into account when formulating alternatives:

- The geographical extent of which each plan is set, there is no scope for an alternative that expands or reduces the study area extent,
- Higher level plans that set strategic planning options. This specifically relates to the *Core Strategy* and associated settlement hierarchy that has been laid out in Section 3.1 of the KCDP 2015-2021.
- The KCDP 2015-2021 was influenced by the then *National Spatial Strategy 2002-2020*, since proceeded in February 2018 by *Project Ireland 2040 - National Planning Framework* and *the Regional Planning Guidelines for the South-West 2010-2022*. It provides detail on the population growth to be allocated to each MD in the county. There is no alternative to these population figures in relation to MD population growth. Killarney MD projected growth is highlighted as 2,525.
- Hub towns of Tralee-Killarney as detailed in Section 3.1 of the KCDP 2015-2021. Plans were therefore required to reflect policies/objectives re-the promotion of the sustainable development of the towns of Tralee and Killarney.
- The plans are landuse plans primarily concerned with the regulation of development in accordance with the proper planning and sustainable development of the area including the environmental impacts this development

may have. The content is predetermined by relevant sections of the Planning and Development Act, (as amended).

- The Core Strategy of the KCDP 2015-2021 outlines the zoning of lands for residential development in each MD that reflects targeted population growth. The figures were based on the sustainable availability of public infrastructure – waste water and water supply – as informed by the strategic plans of Irish Water. Therefore, there was no scope to look at an alternative settlement hierarchy other than that outlined in the Core Strategy.
- In the Killarney MD the settlements have been allocated population growth – Killarney, Castleisland, Rathmore, Fieries, Barraduff, Kilcummin and Farranfore.
- In addition, the NFP seeks to promote 30% of new homes in infill or brownfield sites in towns with populations greater than 10,000. This implies 30% of residential housing for Killarney town is to be allocated for sites close to the town centre, and
- The percentage of urban versus rural population growth was allocated under the Core Strategy. There was no feasible alternative to these allocated urban/rural figures.

The alternative scenarios to be considered in the SEA of this Killarney MD LAP/ 4th variation to the KTDP were therefore limited by the hierarchical policies/objectives outlined above. Scenarios could only relate to alternatives within settlements which are allocated population growth as per the *Core Strategy* as previously assessed as part of the KCDP 2015-2021. As noted in the EPA 2015 guidance on alternatives, the “do-nothing” option was not deemed a viable alternative for a land use plan. There was a statutory requirement to make/and/or review land use plans. A *business as usual* alternative however was considered – essentially the likely evolution of the current state of the environment without the implementation of the Killarney MD LAP/ 4th variation to the KTDP. The alternatives considered are outlined below.

4.3 Assessment of Alternatives against Environmental Objectives

The four alternatives compared to each other to determine the scenario with the lowest levels of environmental impact is presented below. The limits on alternative options is outlined in the previous section.

Alternative 1: This alternative looks at the option of facilitating unphased residential development within the boundaries of settlements identified for population growth. This implies no distinction between *new/proposed residential* or *strategic residential reserve*. Rather residential development would be permitted at any stage within lands identified as suitable for residential development. This alternative would adhere to population growth figures as per the Core Strategy. However, the alternative would accommodate population growth within any land identified suitable for residential development within settlement boundaries.

Alternative 2: This alternative looks at the option of facilitating phased residential development within the boundaries of settlements identified for population growth. This implies phasing or timing residential development so that lands zoned *new/proposed residential* located close to urban cores are developed first. Lands identified as *strategic residential reserve* would not be developed until such times as those identified close to the urban core are developed. This alternative looks at land use zoning that aims to consolidate the urban core of the towns/villages allocated population growth.

Alternative 3: This alternative looks at the option of allowing the proposed masterplans for both opportunity sites and urban areas drive development in Killarney and Castleisland town coupled with phased residential development. This alternative recognises the importance of the both settlements in the sustainable economic development of the entire MD area. Masterplans are proposed for several opportunity sites in the towns that could accommodate mixed uses in key locations.

Alternative 4: this alternative looks at a *business as usual* ie the likely state of the environment without the implementation of the MD LAP/4th variation.

In the ER the alternatives outlined above are assessed and compared for significant likely effects on the environment. The scenario with the lowest levels of environmental impact was identified. This process was undertaken by evaluating each alternative against the EOs provided in Chapter 6 of the ER. In assessing the likely significant effects alternatives, the full range of effects including 'secondary, cumulative, synergistic, short, medium and long term, permanent, temporary and negative effects were addressed.

4.4 Preferred Strategy

Further to the assessment process Alternative 3 was deemed the preferred option. This option seeks to utilise several masterplans underway and proposed to drive Killarney as the key town in the MD area whilst phasing residential development in the three settlements identified for population growth in the Core Strategy of the KCDP 2015-2021.

The preferred strategy nonetheless was identified in the SEA process as having potentially conflicting interactions with a number of environmental objectives (EOs). Accordingly, mitigation measures were recommended so as to reduce / eliminate potentially negative impacts identified.

5 MONITORING PROGRAMME

5.1 Monitoring Proposed

Monitoring as part of the SEA process is required in order to identify at an early stage any unforeseen adverse effects caused by the draft plan. This allows remedial action to be taken. Monitoring prevents the actual impacts of the plan to be measured against those that were predicted. It allows major problems to be identified and dealt with in a timely fashion, and environmental baseline information to be gathered for future plan reviews. It also ensures that proposed mitigation measures are carried out and that no unforeseen impacts occur.

The methodology used in the development of the monitoring programme for the draft plan is based on the use of indicators and targets, the assignment of responsibilities and the setting of appropriate time lines. It also includes intervention in the event of an unforeseen occurrence.

Monitoring is carried out by reporting on the set of indicators and targets drawn up for the various environmental aspects and used to describe future trends in the baseline, which enable positive and negative impacts on the environment to be measured. The indicators that are used show changes that would be attributable to implementation of the Plan. In particular, the indicators can also in certain circumstances act as an early warning system should unforeseen impacts occur or conditions deteriorate further or faster than anticipated. For example, water quality indicators describe trends in both improvements and deterioration in water quality. If quality targets are not being reached and water is seen to be unexpectedly deteriorating immediate intervention will be required.

Monitoring will focus on aspects of the environment that are likely to be significantly impacted by the Plan. Indicators and targets have been identified for the main environmental issues in the study area, namely water, biodiversity, cultural heritage and landscape.

The indicators chosen are at a level, which is relevant to the Plan, and are collated and reported on by a variety of Government Agencies, such as EPA, OPW, National Parks and Wildlife Services and different sections within Kerry County Council.

Much of the indicator information required is already being actively collected and reported at a level sufficient to meet the needs of this Plan. The frequency of monitoring is set by relevant legislation.

The monitoring programme for the SEA is given in Table 3. This will be used to monitor the implementation of the Killarney MD LAP/4th variation to the KTDP 2009-2015 (as extended) and possible effects on the environment.

Table 3 Proposed Monitoring of EOs

SEA Topic	Objective	Target	Indicators	Monitoring Data Available & Who/Where
Population	P1: Guide the future development of the MD area in a sustainable manner that reflects the existing character and amenities of the area and improves the quality of life for the existing and future populations.	That populations in the MD area have access to high quality residential, amenity and public infrastructure with sustainable travel patterns	<ul style="list-style-type: none"> • Provision of public facilities over lifetime of the plan – amenity, recreational/green infrastructure • Design statements/public realm plans undertaken • Village Renewal schemes/projects undertaken • Master Plans completed • Travel patterns within MD area • Population of settlements over lifetime of MD LAP • % of <i>new/proposed residential zoning</i> developed including within town/village cores • Social Housing provided • Quantity of brownfield/infill sites developed over lifetime of the plan. • Development of Opportunity/regeneration sites identified Killarney, Castleisland and Fieries. 	Yes – information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC; EDU (Economic Development Unit) KCC; MD office/r, KCC; Capital Infrastructure Unit (CIU), KCC; Irish Water and CSO data.
Human Health	HH1: Protect the public from threats to health and wellbeing across the functions of relevance to the MD LAP	That the quality of the local environment that is governed by the MD LAP protects the health and wellbeing of the population	<ul style="list-style-type: none"> • As above – equally applicable to human health • Compliance with existing legislation/regulations/conditions for relevant licences, 	Yes- information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC; EDU (Economic

SEA Topic	Objective	Target	Indicators	Monitoring Data Available & Who/Where
			<p>permits etc for discharges noise, odour and/or air quality</p> <ul style="list-style-type: none"> Health Impact Assessments/relevant sections of EIA submitted with planning applications 	<p>Development Unit) KCC; MD office/r, KCC; Capital Infrastructure Unit (CIU), KCC; Irish Water and CSO data.</p> <p>Also, Enforcement & Environment Sections KCC/EPA</p>
Biodiversity (Flora/Fauna)	B1: Protect biodiversity including ecosystem services and important ecological corridor/linkages supporting biodiversity	That biodiversity is integrated into all decision making across the functions of the MD LAP	<ul style="list-style-type: none"> Sustainable integration/provision of green infrastructure and blueways Compliance of plans/projects/activities originating from the MD plan with Article 6 of the Habitats Directive Compliance with existing legislation/regulations/conditions for relevant licences, permits etc for discharges Landscaping plans for developments – native species/ecological networks/planting for pollinators Ecological reports submitted with planning applications Invasive species management plans 	<p>Yes- information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC; EDU (Economic Development Unit) KCC; Environmental Assessment Unit (EAU); MD office/r; Irish Water.</p> <p>Also, Enforcement & Environment Sections KCC/EPA</p> <p>IFI and NPWS data also available.</p>
Geology/Soil	S1: Protect soils against pollution, and prevent degradation of the soil resource	That the soil/geology and the geological heritage of the MD LAP area is protected	<ul style="list-style-type: none"> % change of land use in settlements in the plan area Impacts to GSC sites from development Quantity of brownfield/infill 	<p>Yes - information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC.</p>

SEA Topic	Objective	Target	Indicators	Monitoring Data Available & Who/Where
			<ul style="list-style-type: none"> sites developed Development of Opportunity/regeneration sites identified in Killarney and Castleisland town Geological reports/relevant sections of EIA submitted with planning applications. 	GSI data also available.
Water	W1: Ensure that the status of waterbodies is protected, maintained and improved in line with the requirements and implementation plans of the WFD	That the functions governed by the MD LAP support compliance with the objectives of the WFD for all waterbodies within the LAP, especially AFAs	<ul style="list-style-type: none"> Compliance with existing legislation/regulations/conditions for relevant licences, permits etc for discharges Relevant reporting from the WFD including reporting on AFAs identified in the plan Compliance of plans/projects/activities originating from the MD plan with Article 6 of the Habitats Directive Water/hydrogeology reports/relevant sections of EIA submitted with planning applications 	<p>Yes- information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC; Environmental Assessment Unit (EAU) and Irish Water.</p> <p>Also, Enforcement & Environment Sections KCC/EPA</p> <p>Also, data available from WFD/LAWCO/EPA</p> <p>IFI and NPWS data also available.</p>
Air Quality	AQ1: Protect local air quality from emissions that are harmful to human health and the local environment	That the quality of the local environment governed by the functions of the MD LAP protects local air quality	<ul style="list-style-type: none"> Compliance with existing legislation/regulations/conditions for air quality Traffic patterns within the MD Area Integration/provision of green infrastructure % of <i>new/proposed residential zoning</i> developed 	<p>Yes- information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC.</p> <p>Also, Enforcement & Environment Sections KCC/EPA</p>

SEA Topic	Objective	Target	Indicators	Monitoring Data Available & Who/Where
			including within town/village cores <ul style="list-style-type: none"> • Quantity of brownfield/infill sites developed • Development of Opportunity/regeneration sites identified Killarney, Castleisland and Feries • Air quality/emissions/odour reports/relevant sections of EIA submitted with planning applications 	
Climatic Factors	C1: Ensure the integration of Climate action - mitigation and adaption in to MD LAP	That mitigation and adaptation to climate change inform the functions/decision making governed by the MD LAP	<ul style="list-style-type: none"> • % of <i>new/proposed residential zoning</i> developed including within town/village cores • Quantity of brownfield/infill sites developed • Development of Opportunity/regeneration sites identified Killarney, Castleisland and Feries • FRA reports undertaken • Implementation of SuDS & similar technologies • Integration/provision of green & blue infrastructure • Population of settlements over lifetime of MD LAP • Traffic patterns within the MD Area • Renewable energy projects • Impacts on natural carbon 	Yes- as above

SEA Topic	Objective	Target	Indicators	Monitoring Data Available & Who/Where
			<ul style="list-style-type: none"> sink (eg peat soil) Provision of greenways/walksways/cycle ways 	
Material Assets	M1: Protect the material assets of the MD LAP while optimising new assets to match proposed growth and sustainable development.	That the MD LAP promotes sustainable development that matches existing and new infrastructure with the proposed population growth in the MD area.	<ul style="list-style-type: none"> Completion of infrastructure projects identified in the MD LAP Growth in settlements with sufficient waste water infrastructure as per the Core Strategy Hubs/co-working offices linked to the roll out of National Broadband Plan Provision of public facilities over lifetime of the plan – amenity, recreational/green infrastructure Master plans completed Quantity of brownfield/infill sites developed. Development of Opportunity/regeneration sites identified Killarney, Castleisland and Fieries 	Yes- information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC; EDU (Economic Development Unit) KCC; MD office/r; Broadband Officer, KCC; Operational Section, KCC, KCC NRDO; Irish Water and CSO.
Cultural Heritage	CH1: Protect the cultural heritage of MD LAP area	That protection of the LAP's cultural heritage informs the functions/decision making of the MD LAP.	<ul style="list-style-type: none"> Design statements/public realm plans undertaken Village Renewal schemes/projects undertaken Master Plans completed Archaeological Impact Assessments, and/or 	Yes- information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC; EDU (Economic Development Unit) KCC; Environmental Assessment Unit (EAU); MD office/r; Conservation Officer and

SEA Topic	Objective	Target	Indicators	Monitoring Data Available & Who/Where
			<ul style="list-style-type: none"> archaeological investigations undertaken Architectural Impact Assessments/Surveys undertaken for PS/ACAs Visitor numbers for iconic cultural heritage sites including WAW. Number of literary, musical, artistic and other cultural initiatives undertaken in the MD Area 	<p>County Archaeologist, KCC.</p> <p>Also, Tourism Office, Arts Office, KCC and data from Failte Ireland/OPW/NPWS/KCC and Failte Ireland WAW monitoring data.</p>
Landscape	L1 Protect the landscape of the MD LAP area	That landscapes identified in the MD area, including local urban townscapes and streetscapes, are protected and enhanced by good design principles.	<ul style="list-style-type: none"> Design statements/public realm plans undertaken Village Renewal schemes/projects undertaken Visual Impact Assessments/relevant sections of EIA submitted with planning applications Architectural Impact Assessments undertaken for PS/ACAs 	<p>Yes- information available from variety of sources including Forward Planning Unit & Development Management Unit, KCC; Conservation Officer, KCC.</p>
Flooding	F1 Protect the public and infrastructure from inappropriate development in areas at risk of flooding	That sustainable flood risk management practices are implemented in the MD LAP area in adherence to DOEHLG's <i>Guidelines on Flood Risk Management</i>	<ul style="list-style-type: none"> Flood Risk Assessment reports submitted with planning applications in compliance with the SFRA Implementation of SuDS & similar technologies Integration/provision of green & blue infrastructure over the lifetime of the plan 	<p>Yes- information available from Forward Planning Unit & Development Management Unit, KCC.</p> <p>Also, CFRAM data and OPW.</p>

6 FINAL STAGE OF THE SEA PROCESS

This report outlines and summaries the SEA of the Killarney MD LAP/4th variation to the KTDP 2009-2015. The plans commenced in December 2016 and were informed via an iterative process by the SEA, AA and SFRA. This report, as a SEA Statement, specifically documents the SEA of the plan making process. It is as a requirement of the Planning and Development Regs. 2001 (as amended). The SEA Statement concludes the SEA of both the Killarney MD LAP/4th variation to the KTDP 2009-2015. SEA monitoring, as noted in the preceding section, will however be ongoing over the lifetime of the Killarney MD LAP/4th variation to the KTDP 2009-2015 which extends from 2018-2024 (6 years).