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## 1.0 INTRODUCTION

This Environmental Report forms part of the Strategic Environmental Assessment (SEA) of the review of the existing Tralee Town Development Plan (2003-2009) and the Draft Tralee Development Plan 2009-2015. The purpose of this Environmental Report is to identify, evaluate and describe the likely significant effects on the environment of implementing the Tralee Development Plan.

Tralee Town Council, as a Planning Authority, has a duty to review its Development Plan every six years. The existing Tralee Development Plan was adopted in December 2003 and remains in force until December 2009. The review of the Development Plan began in October 2007 and the new Plan will be adopted by March 2009. The new Development Plan will state the Planning Authority's policies for land use and for planning control and promotion in the area for the period 2009 to 2015.

As the population of Tralee is more than 10,000 persons, Tralee Town Council is required to prepare an Environmental Report in respect of the Review of the Town Development Plan and the preparation of a new Development Plan under Section 13B of the Planning & Development (Strategic Environmental Assessment) Regulations 2004.

Since the adoption of the 2003-2009 Development Plan, there have been many significant changes in the external environment in which Tralee Town Council functions (e.g. economic growth, development of infrastructure, demands on existing services etc). These changes have occurred at all levels – international, national, regional and local, and they all impact directly or indirectly on the future development of the town. Cognisance has been taken of these changes during the preparation of the policies and objectives of the Draft Development Plan.

## 2.0 SEA METHODOLOGY

The SEA methodology involves the following main stages:

- Scoping the extent and level of detail to be examined in the Environmental Report and evaluation of feedback received from the scoping consultation process.
- Identify the content and main objectives of the Tralee Development Plan, its relationship with other plans and programmes and the reasonable alternatives considered.
- Establish the current (baseline) environment of the areas likely to be significantly affected by the implementation of the Development Plan.
- Identify the relevant aspects of the current state of the environment and their likely evolution without implementing the Plan (Do-Nothing Scenario). The assessment will focus on the “Key Issues” identified at the scoping stage.
- Identify environmental protection objectives (National and EU Level), which are relevant to the Plan.
- Assessment of the impact of implementing the Development Plan.
- Consultation on the Plan and Environmental Report.

- Production of the SEA Statement.
- Monitoring the environmental effects of implementing the Plan.

### **3.0 CONSULTATION**

#### **Draft Development Plan**

Public participation is an essential element in the planning process, and in particular the formation of planning policies which will shape the future development of Tralee. The Tralee Town Development Plan review provides a number of opportunities for public participation throughout the process.

Following the publication of a notice informing the public of the commencement of the Plan review, Tralee Town Council published an Issues Paper in October 2007 and invited submissions on the issues raised. The purpose of the Issues Paper was to explain the process, highlight issues, stimulate debate and encourage public participation. This Issues Paper formed the basis of a period of public consultation lasting 8 weeks.

#### **SEA Scoping**

The Issues Paper published by the Council identified that an SEA of the Development Plan was required and invited the public to make submissions on environmental issues pertaining to Tralee. Submissions received were used to inform the Scoping Report for the SEA prepared by the Council.

Under SEA legislation, The Environmental Protection Agency (EPA); The Department of the Environment, Heritage and Local Government (DoEHLG) and Department of Communications, Energy and Natural Resources (DCENR) must be consulted in relation to the scope and level of detail to be included in the Environmental Report. A formal letter requesting submissions on the scope and detail of information to be contained in the Environmental Report was issued to these authorities in January 2008, accompanied by the Scoping Report. Responses were received from the EPA and DCENR.

In addition to the above, a number of stakeholders were consulted during the preparation of the Environmental Report (e.g. South Western Regional Fisheries Board, National Parks & Wildlife Services, Office of Public Works, Kerry Co. Co. Planning Department (Forward Planning) and Environmental Department).

Submissions, observations and comments resulting from this scoping process have been taken into account during the preparation of the Environmental Report for the SEA.

#### **Consultation – Environmental Report**

The Environmental Report along with the Draft Development Plan will be put on display for public consultation. A notice advising of the above will be published to inform the public of where and when the reports can be inspected and where written submissions can be sent. Both reports will be made available on the Tralee Town Councils website.

## 4.0 RELEVANT PLANS AND PROGRAMMES

In preparing the review of the Tralee Development Plan, the Town Council must adhere to various EU, national and regional policies. The Planning and Development Acts 2000-2006 requires that, so far as it is practical, a Development Plan shall be consistent with national plans, policies and strategies, which relate to the proper planning and sustainable development of the area covered by the Plan. National, regional, county and local plans, strategies and guidelines relevant to the Tralee area were identified. The environmental protection objectives of these plans, strategies etc. were used to inform the selection of appropriate Environmental Protection Objectives for the SEA.

## 5.0 CURRENT STATE OF THE ENVIRONMENT

The environmental baseline together with Environmental Protection Objectives, are used to identify, describe and evaluate the likely significant environmental effects of implementing the Plan and to determine the required monitoring measures.

The environmental baseline is described in the main body of the Environmental Report and encompasses the following components:

- Biodiversity
- Population
- Human Health
- Flora
- Fauna
- Soil
- Water
- Air
- Climatic Factors
- Material Assets
- Cultural Heritage including Architectural & Archaeological Heritage
- Landscape
- and the Interrelationship Between These Components.

## 6.0 CURRENT ENVIRONMENTAL ISSUES

Environmental pressures on and environmental issues pertaining to Tralee Town include;

- the current settlement pattern in the town resulting in urban sprawl and traffic congestion in the town centre;
- the lack of sustainable transport systems within and adjacent to the town resulting in increased private car usage with impact on traffic congestion, air quality and quality of life
- current deficiencies in the wastewater drainage system which could affect the quality of surface waters in the area;
- threats to biodiversity in the area due to direct and indirect impacts from development and inappropriate use of the small areas of “green space” remaining within the town;

- potential impact on the archaeological and architectural heritage of the town due to inappropriate development
- threats to the landscape character of the town and its environs from inappropriate development and urban sprawl.

A summary of the existing baseline environment and significant environmental issues pertaining to the town is outlined in **Table 1**.

Further details of the current environmental issues relating to the town are given in more detail in the main body of the Environmental Report.

**Table 1 Summary of Environmental Baseline and Significant Environmental Issues**

Environmental Aspect	Baseline	Current Issues	Policy Area
<p><b>Biodiversity, Flora and Fauna</b></p>	<p>Tralee Bay SAC (Lee Estuary Upper)                      Ballyseedy Wood SAC (nearby)                      Lee River Valley                      Big River                      Flyte (Kearney's) River                      Fisheries resources in rivers and Tralee Bay including Shell Fish Water Designation                      Trees and hedgerows                      Town parks</p>	<p>Potential Impact on Tralee Bay SAC from WwTP.                      Potential impact on Big and Lee Rivers from CSOs (Combined Storm Overflows) and urban drainage.                      Loss of biodiversity (hedgerows, agricultural land and trees) due to rezoning of agricultural lands.                      Loss of trees and hedgerows due to development in the town.                      Loss of biodiversity due to urban sprawl                      Potential impact of wastewater/urban drainage</p>	<p>Natural Environment                      Landuse zoning objectives                      Environmental Management</p>
<p><b>Population and Human Health</b></p>	<p>Population within town stable/ falling slightly.                      Ageing population and household size decreasing. Number of school going children declining.                      Low density suburbs - some resistance to increased densities in the past – probably due to poor urban design.                      Population in Tralee Environs expanding significantly resulting in urban sprawl.                      Traditional market town serving hinterland. Now Tourism is a major economic asset.</p>	<p>Urban sprawl due to increasing population in environs resulting in increased commuter traffic and traffic congestion, loss of rural landscape features and biodiversity.                      Need to consolidate the town centre.                      Option to increase density while maintaining unit size mix.                      Need public transport and safe and attractive walking and cycling routes                      Need to ensure vitality and viability of the town.                      Need to facilitate sustainable economic growth.</p>	<p>Land use Zoning Objectives                      Area Action Plans                      Transport                      Development management guidelines                      Enterprise Economy and Employment                      Social Infrastructure and amenity                      Housing</p>

Environmental Aspect	Baseline	Current Issues	Policy Area
	<p>There are a number of industrial and retail parks.</p> <p>Community and amenity facilities present within the town – e.g. Lee Valley Park.</p> <p>Note Tralee Environs subject to its own LAP.</p>	<p>Need sustainable communities with good quality urban design and neighbourhood centres.</p> <p>Need to keep amenity and sports facilities in the town.</p>	
<p><b>Water</b> (Groundwater, surface water, drinking water)</p>	<p>Regionally important underlying aquifer, vulnerable to pollution near karst features and rock outcrops.</p> <p>Water bodies include;</p> <p>River Lee and Big River</p> <p>Flyte (Kearney’s) River</p> <p>Lee River estuary and Tralee Bay</p> <p>Upper Lee Estuary – “Sensitive Water”</p> <p>Poor water quality in rivers but water quality unpolluted in estuary and bay</p>	<p>Generally deep overburden protecting the underlying aquifer although potential risk to quality of ground water from surface pollution near karst features and outcropping rock</p> <p>Poor water quality in rivers relating to;</p> <p>-agriculture upstream</p> <p>-impact of CSOs and urban drainage</p> <p>Potential impact on Tralee Bay due to nutrient/bacteriological loading from rivers and urban waste water.</p>	<p>Environmental Management</p> <p>Natural Environment</p> <p>Land use Zoning Objectives.</p>
<p><b>Air and Climate</b></p>	<p>Current air quality satisfactory</p> <p>There are a number of energy efficiency and renewable energy initiatives in place in the town to minimise greenhouse gas emissions.</p>	<p>Emissions from traffic are a major source of air pollutants in the area and a major emitter of greenhouse gases.</p> <p>Initiatives required to effect modal shift from private car dependency to public transport in order to reduce greenhouse gas emissions</p>	<p>Transportation</p> <p>Environmental Management</p>
<p><b>Soil and Geology</b></p>	<p>Town area underlain with limestone bedrock, karstified in areas</p>	<p>Deep soils affording protection to underlying bedrock aquifer.</p>	

Environmental Aspect	Baseline	Current Issues	Policy Area
	<p>These are overlain by limestone till sub-soils on the north side of the River Lee, undifferentiated alluvium soils along river channels and sandstone tills to the south of the River Lee.</p> <p>Soils present include made ground, deep poorly drained and well drained gleys and podzols and mineral alluvium soils along water courses.</p>	<p>No information available on contaminated soil.</p>	
<b>Cultural Heritage</b>	<p>Originally medieval town, now traditional market town</p> <p>Architectural Conservation Area</p> <p>Zone of Archaeological Potential</p> <p>Public interest in town’s heritage</p>	<p>Pace of recent development putting pressure on architectural character of town</p> <p>Loss of architectural features</p> <p>Inappropriate repairs a problem</p> <p>Erosion of town centre character giving way to homogeneity</p> <p>Threat to existing street pattern due to new traffic management and roads</p>	<p>Built Environment and Urban Design</p>
<b>Material Assets</b>	<p>Regional Water Supply to town from Lough Guitane managed by Kerry Co. Co. Occasional wells on town outskirts and environs.</p> <p>Modern Waste Water Treatment Plant serving town, discharging to upper Lee Estuary. Adequate capacity to cater for planned growth. Issue with hydraulic load due to infiltration and leakage from collection system</p> <p>History of flooding in the 1980s along the River Lee and Big River</p>	<p>Regional water supply currently adequate for town –but under pressure from significant leakage. Some quality issues relating to pipe network.</p> <p>Upgrade of regional water supply planned to cater for future development.</p> <p>Phosphorus removal planned for treatment plant. Upgrade of collection system required to minimise hydraulic and impact of CSO on river and estuary</p> <p>SuDS possible solution in relation to management of urban drainage (quality</p>	<p>Environmental Management</p> <p>Landuse Zoning Objectives</p> <p>Built Environment and Urban Design</p>

Environmental Aspect	Baseline	Current Issues	Policy Area
	<p>Current stipulation on minimum floor levels in areas identified as at risk from flooding.</p> <p>Modern landfill near the town but little waste infrastructure within the town to encourage sustainable waste management.</p> <p>Town well served by road, rail and air transport infrastructure.</p> <p>Medieval/traditional street layout not conducive to modern traffic circulation resulting in congestion in centre of town.</p>	<p>and quantity) but aquifer vulnerability needs to be checked before recommending.</p> <p>Sea level rise and more frequent extreme rainfall events due to climate change may have an impact on flooding in the area.</p> <p>Significant infrastructure and management measures needed to meet objectives and targets of Regional Waste Management Plan.</p> <p>High dependency on private car transport within the town and environs leading to traffic congestion in the centre of the town with associated safety, environmental and quality of life issues.</p>	
<p><b>Landscape</b></p>	<p>Views from the town to surrounding vistas including Blennerville and Tralee Bay</p> <p>Lee Valley and shipping canal</p> <p>Views to town parks and urban landscaping</p> <p>Low density urban design and traditional streetscapes surrounded by rural agricultural environment</p> <p>Architectural Conservation Area</p>	<p>Urban Sprawl</p> <p>Increasing density and poor urban design</p> <p>Loss of existing architectural integrity and features</p> <p>Potential loss of water quality from urban drainage impacting on rivers and Bay</p>	<p>Natural Environment</p> <p>Environmental Management</p> <p>Built Environment and Urban Design</p> <p>Area Action Plan</p> <p>Landuse Zoning Objectives</p>

## 7.0 ASSESSMENT OF ALTERNATIVES

Article 5 of the SEA Directive requires the Environmental Report to consider “*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*”. The guidelines state that the significant environmental effects of the alternatives selected also need to be considered.

Four alternative strategies were considered and are summarised below. Full details of each are detailed in the main body of the Environmental Report.

### **Scenario 1: “Do Nothing” Scenario**

The “*Do-Nothing*” scenario is the scenario which would occur in the event of non-implementation of the new Development Plan 2009-2015 and the continuation with the previous Development Plan 2003-2009.

### **Scenario 2: Unplanned or Unregulated Growth**

This growth scenario envisaged growth without planning or at least planning on an ad hoc basis. Population and economic growth would occur in the absence of planning guidance on the location of development.

### **Scenario 3: Over-Restrictive Planning Policy**

In this scenario there would be very tight controls on development and growth with a large emphasis on the sequential approach to settlement patterns. Development would be permitted only on lands adjacent to the historic core of the town and lands on the outskirts of the town would not be zoned for development.

### **Scenario 4: Sustainable Planning Policy**

In this scenario, there is a compromise between environmental protection and growth where by strict controls in relation to environmental impact are relaxed.

### **“Preferred Strategy”**

The four alternative strategies as outlined above were considered in light of the significant environmental issues for the Town. As a result of these considerations, Scenario Four: Sustainable Planning Policy was determined the “*preferred strategy*”.

## **8.0 ENVIRONMENTAL PROTECTION OBJECTIVES RELEVANT TO THE PLAN**

Environmental Protection Objectives have been identified for each environmental aspect in line with the legislative requirements. These objectives are distinct from the Tralee Town Draft Development Plan objectives and provide a standard against which the goals, policies and objectives of the Draft Development Plan can be assessed in order to highlight those policies and objectives that have the potential to adversely impact on the environment.

Environmental Protection Objectives are used as a tool to cross check the policies of the Draft Development Plan in order to maximise the environmental sustainability of the Plan. The cross checking process helps identify policies that will be likely to result in significant adverse impacts, so that alternatives may be considered or mitigation measures may be put in place.

## **9.0 ENVIRONMENTAL ASSESSMENT OF DRAFT PLAN**

Compatibility matrices were used to assess the Tralee Town Draft Development Plan objectives and policies against the Environmental Protection Objectives so that policies/objectives with the potential for significant adverse environmental impacts could be highlighted.

This assessment was carried out during the preparation of the Draft Development Plan and changes were made as issues arose to make the Draft Development Plan more environmentally sustainable.

Key environmental impacts likely to arise from the implementation of the review of the Tralee Town Development Plan are summarised below and dealt with in detail in the main body of the Environmental Report.

A screening assessment is being carried out to determine the potential for the Plan to impact on the Tralee Bay SAC.

### **BIODIVERSITY, FLORA AND FAUNA**

Any development policies that would result in the removal of natural, semi-natural habitats or “green” spaces have the potential to negatively impact on the biodiversity potential of the town. Policies that have the potential to increase or enhance the protection of these habitats would have the potential to positively impact on biodiversity. Any policies that result in a negative direct or indirect impact on designated conservation areas would have significant adverse impacts on the biodiversity of the Town, the County and indeed at national level.

The Draft Development Plan includes policies that have the potential to impact adversely on the biodiversity of the area. However, it also includes policies that would ensure the protection and enhancement of natural and manmade habitats. It is essential that at least equal weight is given to environmental protection policies as to “development policies” to ensure the protection of biodiversity, flora and fauna in the Development Plan area.

**POPULATION AND HUMAN HEALTH**

All the policies included in the Draft Development Plan were assessed as either potentially positive or neutral in terms of population and human health.

Policies are included to promote adequate housing employment, amenity, social inclusion and social services. Policies which have the potential to reduce traffic generated air pollutants are included as are policies to reduce the dependency of carbon emitting fuels. These policies will promote positive effects on human health in the area. The promotion of safe pedestrian and cycle routes will potentially have a positive impact on health as will the provision of outdoor amenity areas and sports facilities.

**WATER**

The most significant potential impact of implementing the Plan would be from the discharge of urban drainage to surface waters due to inadequacies in the current drainage system. There are a number of policies included in the Draft Plan to minimise this potential impact.

**SOIL AND GEOLOGY**

Policies included in the Draft Development Plan were assessed generally as having a neutral effect on soil and geology in the area.

**CULTURAL HERITAGE (Including Archaeology & Architectural Heritage)**

The greatest threat to Cultural Heritage in the Town is from the potential impact of new development on unknown (buried) archaeological features, impairment of the architectural character of the town through inappropriate development/urban design, unsympathetic modifications and lack of maintenance of protected structures.

Policies included in the Draft Plan that promote new development within the town have the potential to impact on cultural heritage. However, significant policies have been included to protect and enhance archaeological and architectural heritage in the Town.

**AIR AND CLIMATIC FACTORS**

The main policy areas influencing Air and Climatic Factors are Transportation and Energy. Population and economic growth is likely to result in additional energy usage and transportation demand generating air pollutants and greenhouse gasses.

A significant number of policies relating to energy and transportation have been included in the Draft Plan to promote the reduction of air pollutant and greenhouse gases which should impact positively on air and climate.

**MATERIAL ASSETS**

Any potential growth in the town has the potential to exert demand pressure on existing material assets including water and wastewater infrastructure, transportation infrastructure, energy and communications infrastructure.

Planned growth will place additional demand on current infrastructure. However, policies have been included in the Draft Plan to augment existing capacity.

### **LANDSCAPE AND VISUAL**

Most new development, including infrastructure, will have the potential to impact on the visual amenity of the town and whether this impact is positive or negative can be subjective.

The Draft Development Plan includes a policy to prepare, adopt and implement a Landscape Plan for the town in order to provide for a long term planting and management programme. It also includes policies to ensure a high standard of urban design for new development and to protect views to and from landmark buildings. The Draft Plan also includes policies on the inclusion and management of open spaces within urban areas and policies to enhance the biodiversity of the town which are likely to enhance the landscape and visual amenity of the town.

The overall development strategy of the Town Plan is to consolidate the development of the town by concentrating future development over the Plan period on lands closer to the town centre which should be positive in terms of limiting the proliferation of one-off single houses generated by the Town.

### **ZONING**

The zoning proposed in the Draft Development Plan is largely consistent with the zoning in the current Development Plan with the exception of a significant area of land in Ballyvelly, Lohercanan. This area is currently zoned for agriculture but would be subject to the preparation of an Action Area Plan by Tralee Town Council in conjunction with Kerry Co. Co. The rezoning of this land removes all the remaining land zoned for agriculture within the functional area of the Town Council.

## **10.0 MITIGATION MEASURES**

This section of the Environmental Report describes the measures to prevent, reduce and as fully as possible offset any significant adverse environmental effects of the Development Plan.

The Draft Plan incorporates aims, objectives and policies that are founded on the principle of sustainable development. In particular the Draft Plan has been formulated with a view to the protection of the environment and avoiding potentially adverse impacts.

A significant number of policies and objectives which protect the environment of Tralee are included in the Draft Development Plan. It is essential that these policies are given at least equal weight as “development policies” to ensure that the Development Plan is implemented in an environmental sustainable manner.

Mitigation measures in respect of the potential conflicts with the environment have been proposed for each environmental aspect where deemed necessary and detailed in the main body of the Environmental Report.

## **11.0 MONITORING**

Measures were proposed as part of this SEA process to monitor the effects on the environment of implementing the Draft Plan and these are presented in the Environmental Report in terms of the achievement of the environmental protection objectives and the impact on the environmental factors that the SEA legislation requires to be considered. Measurable indicators are included and targets are set. Monitoring for SEA will be carried out as part of the overall monitoring of implementation of the Tralee Town Development Plan, as required two years after adoption of the Plan.