

**STRATEGIC ENVIRONMENTAL ASSESSMENT
STATEMENT**

TRAMORE LOCAL AREA PLAN

2014 - 2020

February 2014



**Waterford County Council
Comhairle Chontae Phort Láirge**

1. Introduction

The Planning and Development (Strategic Environmental Assessment) Regulations 2004 require that following the adoption of a plan or programme, the plan making authority makes a SEA statement available to the public and environmental authorities. The SEA Statement is required to include information summarising:-

- 1) How environmental considerations have been integrated into the Plan;
- 2) How the environmental report, submissions and observations made to the planning authority on the Plan and Environmental Report have been taken into account during preparation of the plan.
- 3) The reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with and,
- 4) The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

An Environmental Report was prepared by Waterford County Council on the potential significant environmental impacts of implementing the Tramore Local Area Plan 2014-2020. The Environmental Report highlighted key environmental pressures in Tramore as follows ;

Water- including the need for restoration of surface water quality in Tramore Bay. Water quality from the Carrigavrantry Water supply will require ongoing monitoring and treatment in order to delist it from the EPA's Remedial Action List. Bathing water quality at Tramore will require ongoing monitoring to ensure it reverts back to "good" status complying with both EU guide and mandatory values.

Biodiversity- including maintenance of the favourable conservation status of the Tramore Dunes and Back Strand SAC and SPA, conservation of sites of local biodiversity interest, enhancement of ecological corridors and management of invasive species.

Coastal Erosion -Climate change impacts involving floodrisk and coastal erosion will require to be considered in future land use and development patterns in Tramore.

2. Alternatives

Alternatives were considered for the future growth of the town that included continuing with the amount of zoning in the existing Town Development Plan or adopting a Core Strategy and applying phased zoning to ensure compliance with the South East Regional Planning Guidelines.

The preferred option was the application of phased zoning. The Tramore Local Area Plan aims to support growth in existing zoned lands and where existing and proposed infrastructural capacities permit. The Plan proposes to future phase an area of zoned land of approximately

242 ha. providing an area of 42 ha. for residential development over the lifetime of the plan 2014-2020. This is a reduction of 242ha from the existing 284 ha zoned for residential use in the existing plan.

The Core Strategy sets out a requirement of zoned housing land in the town of 42ha for the period 2014-2020 based on the county share out from the population projections established for Tramore by the Core Strategy. Thus it is in the interests of the future settlement strategy for the county and the town of Tramore and in terms of environmental infrastructure to support a sustainable pattern and rate of future growth and accordingly Option 2 is the preferred option.

3. SEA Screening Report and Submissions and Observations

Pre-draft consultation on the Tramore Local Area Plan Issues Paper was carried out between May 1st and May 15th 2013. SEA Screening concluded that SEA and preparation of an Environmental Report were required for the Tramore Local Area Plan.

A total of 13 submissions were received during the Pre-Draft consultation period. Submissions in relation to environmental issues were received from Inland Fisheries Ireland and highlighted the need to include policy on Water Quality, Municipal Sewage Treatment Infrastructure, Aquatic Habitat Protection, Invasive Species, River/Stream Crossing Structures, Water Conservation, SUDS, Management Policies and Sustainable Planning for the Environment. Policies were included in the plan in relation to WWT capacity and compliance with water quality (obj INF8, Policy INF11, Policy INF12).

The Draft Tramore Local Area Plan and Environmental Report were put on public display from June 10th 2013 until July 22nd 2013. A total of 20 submissions were received in relation to the plan. Eight of the submissions were concerned with the zoning of specific areas of land. Issues raised in the submissions included the following;

Improvements for pedestrian and disability access within the town.

Masterplan for the Promenade Area.

Recognition and Protection of Bookie Woods for its biodiversity and landscape amenity value.

Flood Risk Assessment required for Plan area.

Protection of trees and woodlands in Tramore and designation of Tree Preservation Orders.

Coastal Zone Management.

Derelict sites, Public Realm.

The Department of Arts, Heritage and Gaeltacht (NPWS) advocated full AA and advised the Plan can only be adopted where there are sufficient mitigation measures in the objectives of the Plan to result in commensurate reduction in recreational pressure on dune habitats. This has been addressed in the AA Screening Report.

Two submissions were received on SEA from the DAHG and the EPA. The DAHG submission recommended the effects of any increased water abstraction on the conservation value of Carrickavantry Reservoir should be assessed in the SEA Report. Waterford County Council intend to decommission the Carrickavantry plant by mid 2014 and supply all Tramore with the East Waterford Water Supply.

The EPA requested inclusion of additional maps in Chapter 4 on current state of the environment, clarification of alternatives, clarification of full range of environmental effects including cumulative effects and clarification of monitoring. Findings of AA and SEA to be incorporated into Plan and SEA.

The consideration of submissions and how they were incorporated into the Plan and Environmental Report is detailed in the Manager's Report available on <http://www.waterfordcoco.ie/en/media/planning/pdfs/laps2013/Tramore%20Managers%20Report.pdf>.

Amendments proposed to the Draft Tramore Local Area Plan including amendments to existing policies and zonings and insertion of additional policies and objectives were screened for SEA. The SEA matrix did not identify any significant effects arising from the amended policies or proposed zoning changes contained in the Draft Tramore Local Area Plan. The inclusion of Policy GH1 and objectives NHI and G1 are positive policy additions for the natural environment. Uncertain impacts from Draft Plan policies and objectives such as ETD1 (zoning of industrial lands), ETD 2 (Water based tourism activities), Obj INF 7 (provision of a helipad) and CS11 (promotion of walkways and cycleways) were addressed through revised and strengthened policies that incorporated reference to requirements of Habitats and Birds Directives as appropriate.

Inclusion of additional policies for protection of geological heritage sites and objective to carry out an assessment of trees and woodlands within the LAP within the lifetime of the plan are positive additions for the natural environment. The addition of ObjNH1 and objG1 are also positive in requiring an appropriate level of environmental assessment prepared to an acceptable standard in respect of any proposed plan or project likely to have an impact on biodiversity sites or protected species.

Zoning amendments to the plan including zoning changes for Tankfield, Newtown, Pickardstown, Crobally, Ballinattin, CBS, Pond Road and the Glen Road were considered not to pose significant effects on the range of environmental criteria. The zoning amendment proposed for Crobally Lower involving rezoning from open space to residential while outside the SAC is adjacent to the designated site and currently acts as a green space buffer to the SAC and infers uncertain impacts for biodiversity. Any proposed development on the site under this zoning will

be subject to Project Appropriate Assessment as qualified by objectives NH1 and G1 and policy NH1 in the Plan.

The zoning amendment proposed for the Glen Road involving rezoning from open space to residential will incur loss of open space and an area of natural environment value and infers uncertain impacts for biodiversity and landscape. Any proposed development on the site will be subject to policy G1 and objective G1.

Material Amendments and the SEA Screening Report were put on display from November 4th until December 2nd 2013. Twelve submissions were received on the proposed amendments including one submission on SEA from the EPA. The EPA welcomed the inclusion of many points raised in their previous submission on the Draft Plan and SEA Environmental Report. They recommended that considerations of zoning/re-zoning additional residential land should be set in the context of promoting sustainable development. Following adoption of the Plan an SEA Statement should be prepared and sent to any environmental authority consulted during the SEA process.

The Draft Tramore Local Area Plan was presented for adoption at the Council meeting of February 10th 2014 and adopted as per the recommendations made in the Manager's Report of December 2013 and without any further zoning amendments.

4. How Environmental Considerations were integrated into the Plan

The SEA Environmental Report highlighted the need for protection of bathing waters in Tramore Bay, continued monitoring of public water supplies and provision of sufficient capacity in waste water treatment plants. The need to maintain water quality is key to conservation of biodiversity and water dependant habitats and species. Climate change impacts involving floodrisk and coastal erosion will also require to be considered in future land use and development patterns. The Plan contains an objective (INF11)¹ to implement the provisions of a Flood Management Plan for Tramore and environs as prepared under the SE CFRAM Study. Flood risk maps will be available for the area in 2014 and a Flood Risk Management Plan will be available by 2016.

Table 1 below details the relevant policy and section in the Tramore Local Area Plan 2014-2020 that addresses the key environmental issues identified in the Environmental Report and informed by the consultation process at pre-Draft and Draft Plan Stages. The SEA process has ensured inclusion of policies and objectives for the range of environmental topics and

¹ Obj INF11To implement the provisions of a Flood Management Plan for Tramore and environs as prepared under the SE CFRAM Study

demonstrates a wider policy direction for environmental protection as compared with the previous Tramore Local Area Plan. The SEA process is key in avoiding policy conflict between policies supporting economic and infrastructure development and objectives for environmental protection. The state of the environment is in a much improved position than at the time of preparation of the previous Tramore Local Area Plan (2007-2013). The SEA prepared for that Plan cites remediation of the landfill, waste water treatment, encroachment on the SAC and water quality in Tramore Bay as significant environmental issues. Resolution of all these issues has progressed with closure and remediation of the landfill, creation of a compensatory wetland at Kilmacleague, completion of the WWTP and restoration of Blue Flag Status for Tramore Beach in 2011. The updating of Tramore Beach Bye-laws in 2012 and the ongoing implementation of an Environmental Monitoring Plan for the former Landfill site provide for ongoing improvements in the environment in Tramore.

Table 1. Integration of environmental issues in the Tramore Local Area Plan policies.

Key Environmental Issue		Relevant Town Dev Plan policy
Water Quality	Surface Waters	NH6 & Objs NH1-2 INF 12
	Coastal & Estuarine Waters	NH6 & Objs NH1
	Groundwater	NH6 & Objs NH1
	Drinking Water Quality	INF 10 Obj INF8
	Waste Water	INF11
Biodiversity	Designated sites	NH1-NH4
	Local Biodiversity	GI1-GI3

5. Monitoring Measures

Monitoring of environmental protection objectives and impacts arising from the Tramore Local Area Plan 2014-2020 will be carried out by Waterford County Council at the mid-term implementation review post adoption of the Plan. Data sources that will be used include, NPWS Article 17 Conservation Assessment Reports, EPA and local authority water quality data, OPW flood reports, EPA data on carbon emissions and local authority planning data.

6. Conclusion

SEA assessment of the Draft Tramore Local Area Plan policies and objectives and proposed material amendments concluded that no significant adverse impacts are predicted from the Plan while positive impacts will be realised through proposed policies for integration of green infrastructure, coastal zone management, built heritage and community facilities.

The findings of “uncertain” impacts in the SEA matrix will be determined at a lower level of environmental assessment largely through EIA and AA at the project level. These assessments will involve application of Appropriate or Ecological Assessment, architectural heritage appraisal and flood risk assessment to accurately determine the impacts under the range of environmental headings.

The finding of uncertain impacts on Natura 2000 sites through the Appropriate Assessment screening process will be offset by policies requiring compliance with Article 6 of the EU Habitats Directive. The findings of the AA Screening Report were incorporated into the Environmental Report.

Positive impacts on biodiversity are identified through policies NH1-NH4 promoting protection for habitats and species at a European, national and local level. The application of the green infrastructure concept in the plan will be a positive development for Biodiversity policy in Tramore as will the objective to include the Kilmacleague Compensatory wetland area within the Back Strand SPA. The plan is strong on policies and objectives for provision of community facilities ranging from recreational resources such as the Town Park and Japanese gardens to educational and healthcare facilities. Policies for coastal zone management in Chapter 6 of the plan are also favourable to addressing effects of climate change on natural habitats and for coastal flood risk. The plan contains a range of positive policies and objectives promoting the built heritage of the town.

Monitoring of environmental protection objectives and impacts arising from the Tramore Local Area Plan 2014-2020 will be carried out by Waterford County Council at the mid-term implementation review post adoption of the Plan and will inform future reviews of the Plan.

Table 2. Monitoring Proposals and Environmental Objectives, Indicators and Targets

Biodiversity, Flora, Fauna					
Environmental Objectives	Indicators	Responsible Authority	Frequency of Monitoring	Targets	Intervention
B1: Protect, conserve and enhance the diversity of habitats, species and areas of national or international importance, including aquatic habitats and species and promote the sustainable management of habitat networks.	Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive.	NPWS of DAHG	Every 6 years. Next report due in 2014	Maintenance of favourable conservation status ² for all habitats and species protected under national and international legislation.	Loss of favourable conservation status of protected habitats and species
	Development of saltmarsh habitat at Kilmacleague Compensatory Wetland Site	Waterford Co. Council	Annual	Development of saltmarsh vegetation at Kilmacleague	Non-development of saltmarsh vegetation at Kilmacleague within lifetime of the plan.
	% cover of ecological corridors and sites of local biodiversity interest in Tramore Plan Area	Waterford Co. Council	Annual	No loss of ecological corridors and local biodiversity sites in Tramore Plan area	Notable loss and non replacement of ecological corridors and sites of local biodiversity interest in the Tramore Plan area.

Population and Human Health					
Environmental Objectives	Indicators	Responsible Authority	Frequency of Monitoring	Targets	Intervention
P1: Facilitate a good standard of health for Tramore's population through ensuring high quality residential, recreational and working environments.	Provision of employment, services and amenities within the county.	Central Government, IDA Ireland, Enterprise Ireland County Enterprise Board Tramore Town Council	ESRI quarterly index Monthly Live Register CSO Ongoing	Increase in employment opportunities, services and public amenity within the county	Ongoing
Water					
Environmental Objectives	Indicators	Responsible Authority	Frequency	Targets	Intervention
W1: Achieve and maintain required water quality standards in the South East River Basin Management Plans and associated Programme of Measures and reduce discharges of pollutants or contamination to protect waters as sources of drinking water and as valuable assets for amenity and recreation.	Water quality monitoring results by the EPA for: Surface Water Ecological and Chemical Status. Trophic Status of Estuarine and Coastal Waters. Bathing Water Quality. Groundwater Quality. Drinking Water Quality. Number of Public Water Supplies on EPA Remedial Action List.	EPA Tramore Town Council Waterford Co. Council	Annual	Protect and Restore areas identified in the River Basin District Management Plan required to achieve "good" status, i.e. 4+ for water quality by 2015 in line with the Water Framework Directive objectives. Improvement or at least no deterioration in levels of compliance with drinking water quality standards and promotion to above national average compliance rate.	Deterioration in Water Quality Standards Non attainment of WFD standards and River Basin Management Plans

Air and Climate

Environmental Objectives	Indicators	Responsible Body	Frequency	Targets	Intervention
AC1:Support implementation of <i>National Climate Change Adaptation Framework (Building Resilience to Climate Change)</i>	National Level of Carbon Emissions.	EPA	Annual	20% reduction of greenhouse gas emissions from 1990 levels by 2020.	Ongoing efforts to reduce emissions
	Delivery of County Climate Change Strategy and preparation of local adaptation plans	Waterford Energy Bureau	5 years	Full delivery of Co. Waterford Climate Change Strategy	Ongoing delivery of Climate Change Strategy
	Average daily motor vehicle flow within town	Tramore Town Council	Annual	Preparation of local adaptation plan for Tramore within lifetime of the plan.	Absence of local adaptation plan at mid term LAP review
	Proportion of travel by mode		Annual	Increase in pedestrian and cycle lanes within the town from 2013.	Delay in increase in pedestrian and cycle lanes within the town at mid term LAP review
	Monetary investment in walking and cycling routes		Annual		

Cultural Heritage

Environmental Objectives	Indicators	Responsible Body	Frequency	Targets	Intervention
C1 Protect and conserve features of architectural and archaeological heritage.	Number of structures in RPS in relation to Ministerial Recommendations arising from NIAH Tramore Inventory	DoEHLG NIAH Waterford County Council	Ongoing	To increase the number of Protected Structures in line with ministerial recommendations arising from NIAH surveys.	Damage to or loss of Protected Structures
	Preparation of Town Design Statement	Waterford County Council	Ongoing	Preparation of Town Design Statement and Public Realm Plan to inform future development and design in Tramore	Absence of Public Realm Plan and Town Design Statement by LAP mid Term review
	Preparation of Public Realm Plan	DoEHLG National Monuments Service	Ongoing		
	Number of Monuments in the RMP and areas of archaeological potential which have been recorded or subject to exploration as a result of development.	Owners		To maintain and increase the number of archaeological features recorded and protected.	Damage to or loss of Protected structures or national monuments
	Number of protected structures or archaeological monuments damaged due to development.			No damage occurring to structures or monuments due to development.	

Landscape					
Environmental Objectives	Indicators	Responsible Body	Frequency	Targets	Intervention
L1: Protect and conserve the quality, character and distinctiveness of landscape including coastal landscapes and minimise negative visual impacts.	Building height and extent in visually vulnerable areas and along the scenic route within the Tramore LAP	Waterford Co. Council	Ongoing	Maintenance of scenic amenity quality in visually vulnerable areas and scenic route through control of building heights and sympathetic building design in keeping with the coastal landscape character	Damage to or loss of scenic landscape value
Soils and Geology					
Environmental Objectives	Indicators	Responsible Body	Frequency	Targets	Intervention
S1: Protect quality of soils and prevent erosion of soils and geological heritage sites in the county	Condition of geological heritage sites- notable increase in erosion of dune spit or rocky cliffs	Waterford Co. Council	Ongoing Ongoing	Prevent significant erosion of geological heritage sites	Notable increase in erosion of dune spit or rocky cliffs will require coastal erosion intervention works
Material Assets					
Environmental Objectives	Indicators	Responsible Body	Frequency	Targets	Intervention
MA1: Maintain the quality of and access to assets such as open spaces, water resources and all other physical and social infrastructure.	Access to public amenities and visitor numbers.	Tramore Town Council Waterford County Council	Ongoing	Development of Town Park Development of Japanese Gardens at Tramore House Increased visitor numbers to Tramore House Gardens. Increased usage of Tramore Water recreation facilities	Damage to or loss of sites of amenity value. No attainment of Targets within lifetime of Tramore LAP

List of Persons & Bodies who made Submissions to the Draft Plan

Ref No	Name	Representation
1	Helen Cullen	Private Individual
2	Agnes Aylward	Private Individual
3	Sandra Thompson	The Coastguard Station Tramore
4	Karl O'Sullivan	Private Individual/Landowner
5	Harvey Tucker	Monaco Consultants
6	Noel & Geraldine Curran	Private Individual
7	Mary Tully	Private Individual
8	Yvonne Nolan	Department of Arts, Heritage and the Gaeltacht,
9	Tadhg O'Mahony	Environmental Protection Agency,
10	Dermot Fitzpatrick	Private Individual/Landowner
11	Aldi Stores Limited	Aldi Stores Limited
12	William & Claire Power	Private Individuals
13	Ray McGrath	Irish Wildlife Trust
14	Shirley Crosbie	Office of Public Works
15	Tramore Cultural Development	Tramore Cultural Development
16	Margaret Killeen & Patrick O'Sullivan	Department of the Environment, Community and Local Government
17	Donncha S. O'Maidín	Private Individual
18	Mary Higgins	Irish Wildlife Trust
19	Harvey Tucker	Monaco Consultants
20	Emer & John Cullinan	C/O studio DMA Architecture Waterford