



Strategic Environmental  
Assessment Statement

**CALLAN LOCAL AREA PLAN 2019**

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## 1.0 Introduction

### 1.1 Terms of Reference

This is the SEA Statement for the Callan Local Area Plan (2019-2025). The Callan Local Area Plan 2019-2025 has been prepared in accordance with the requirements of the Planning and Development Act 2000 as amended and sets out an overall strategy for the proper planning and sustainable development of the town.

The Plan comprises the statutory land use plan for the town in terms of the promotion and regulation of development. It provides a clear vision for Callan for meeting the requirements of the existing and future population and provides a development framework for Callan by setting out policy and objectives for the proper planning and sustainable development of the town. The Plan plays a key role in translating overarching County Development Plan policies and objectives to the local level.

Local Area Plans are also required to comply with the provisions of the Strategic Environmental Assessment (SEA) Directive (2001/42/EC) as transposed into the Planning and Development Act, the objective of which is to provide for a high level of environmental protection and to contribute to the integration of environmental considerations into the preparation and adoption of plans.

Although not mandatory for town with the population size of Callan, a Strategic Environmental Assessment was carried out for this LAP as a result of the Appropriate Assessment screening exercise which triggered the requirement for a Natura Impact Report. It was carried out in accordance with Article 14 of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004) as amended which sets out the requirements for Strategic Environmental Assessment (SEA) for Local Area Plans.

### 1.2 SEA Definition

Strategic Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before the decision is made to adopt the plan or programme. The purpose is to *“provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”*<sup>1</sup>

### 1.3 Legislative Context

European Parliament Directive 2001/42/EC, and European Council decision 27th June 2001, hereafter known as the SEA Directive introduced a requirement for SEA to be carried out on all Plans and Programmes across multiple sectors, including land use planning. The SEA Directive is to assess the effects of these Plans and Programmes on the environment.

The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (S.I. No. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). These two statutory instruments have been in operation since 21st July 2004. Further amendments to these statutory instruments have occurred through the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (SI No. 200 of 2011) and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (SI No. 201 of 2011).

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<sup>1</sup> EU, Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment, Article 1

The SEA Directive and the two statutory instruments that transpose it into Irish Law require that upon the completion of a Development Plan, the Local Authority must make a Statement available to both the public and all competent environmental authorities. This statement is known as the SEA Statement.

## 1.4 Content of the SEA Statement

The SEA Statement must include the following information:

- 1) How environmental considerations have been incorporated into the Plan;
- 2) How the following have been taken into account during the preparation of the Plan:
  - (a) the Environmental Report,
  - (b) submissions and observations made to the Local Authority during the Draft process and Environmental Report, and
  - (c) any trans-boundary consultations are taken into account during the preparation of the Plan;
- 3) Why the Plan was chosen over any other reasonable alternatives; and,
- 4) What measures will be taken to monitor any significant environmental effects of implementing the Plan.

This Plan does not consider 2(c) of this content as it is not relevant in this instance.

## 2.0 Integration of Environmental Considerations into the Local Area Plan

### 2.1 Introduction

Environmental Considerations were integrated throughout the Local Area Plan at all stages. The approach included:

- Consultations with environmental authorities;
- Communications of environmental considerations with the Plan team,
- The integration of environmental considerations into the Plan;
- The integration of environmental measures into the Plan, SEA, AA, and SFRA provisions.

### 2.2 Consultation with Environmental Authorities

The formulation of a Local Area Plan is a statutory process which is carried out every six years. The process of preparing a Local Area Plan is documented at each stage of that process. Submissions were invited at each of these stages. The key stages are:

1. SEA Scoping Notice / Pre Draft Consultation
2. Consultation on the Draft LAP and Environmental Report
3. Consultation with respect to the Material Alteration to the Draft LAP and Environmental Report

#### 2.2.1 SEA Scoping Notice / Pre Draft Consultation

The Planning and Development (SEA) Regulations 2004 (as amended) require that notice is provided to Planning and Environmental Authorities. On 7<sup>th</sup> August 2018, planning and environmental authorities were provided notice of the intent of Kilkenny County Council to carry out an environmental assessment. Submissions were sought in relation to the scope and level of detail of the information to be included in the environmental report. As specified in the regulations, the following environmental authorities were contacted

- The EPA;
- Minister for Environment, Community and Local Government;
- Minister for Communications, Energy and Natural Resources;
- Minister for Agriculture, Food and the Marine;
- Minister for Culture, Heritage and the Gaeltacht
- Carlow County Council;
- Waterford County Council;
- Wexford County Council;
- Laois County Council;
- Tipperary County Council

These responses are detailed in Section 3.

#### 2.2.2 Consultation on the Draft LAP and Environmental Report

An Environmental Report in compliance with the European Union SEA Directive (2001/42/EC) and related government guidelines was prepared and placed on public display with the draft Local Area Plan. The central

purpose of this report was to provide information on any existing environmental problems in the town, to set out the likely significant effects of the plan on the environment and possible mitigation measures with a view to improving the environmental performance of the Plan.

The findings of the SEA are presented in an Environmental Report which accompanied the Draft Local Area Plan on public display and are summarised in section 2.4.1 of this statement. The Environmental Report was then updated to take into account of recommendations arising from submissions to the Draft Plan.

### **2.2.3 Consultation with respect to the Material Alteration to the Draft LAP and Environmental Report**

Material Alterations underwent further screening for SEA. A further Environmental Report was prepared, and the findings of this process were placed on public display along with the Material Alterations.

### **2.2.4 Adoption of the Callan LAP (2019-2025)**

Members of the planning authority have taken into account the findings of all relevant SEA outputs during their consideration of the Plan before its adoption. On the making and adoption of the Local Area Plan, this SEA Statement was prepared.

Further detail on responses received at each of the above consultation stages are detailed in Section 3.

## **2.3 Communication of Environmental Considerations and Integration into the Plan**

The Draft Plan, the Environmental Report with respect to Strategic Environmental Assessment, Natura Impact Report and SFRA were prepared by an external team of Planning and Environmental Consultants in collaboration with the Senior and Senior Executive Planners at Kilkenny County Council. Environmental considerations were communicated between the teams throughout the process, allowing the team to integrate environmental considerations into LAP objectives.

## **2.4 Integration of Environmental Measures into the Plan**

The formulation of the Plan is a statutory process which is carried out every six years and its evolution is documented at each stage of that process. Environmental assessment was carried out and documented at each of the following stages:

- Preparation of the Environmental Report for the Draft LAP
- Preparation of the Environmental Report for the Material Alteration to the Draft LAP

### **2.4.1 Preparation of the Environmental Report for the Draft LAP**

An Environmental Report in compliance with the European Union SEA Directive (2001/42/EC) and related government guidelines was prepared and placed on public display with the draft Local Area Plan. The central purpose of this report is to provide information on any existing environmental problems in the town, to set out the likely significant effects of the plan on the environment and possible mitigation measures with a view to improving the environmental performance of the Plan.

### **2.4.2 Summary of Mitigation Measures Proposed Re Draft Plan**

The Environmental Report associated with the Draft LAP set out a number of suggested mitigation measures. Table 2-1 shows where suggested mitigation measures have been accommodated in the adopted Local Area Plan or County wide as part of the County Development Plan.

**Table 2-1: How Suggested Mitigation Measures Have Influenced the Adopted LAP**

Environmental Topic	Provision in the LAP
<b>Biodiversity, Fauna and Flora</b>	
<ul style="list-style-type: none"> <li>Require the preservation of hedgerows within new development</li> </ul>	LAP Objectives NHB1 and NHB2 provide protection for existing biodiversity features such as trees, hedgerows
<ul style="list-style-type: none"> <li>Avoid development on and establish a buffer around designated ecological sites, the size of which will be dependent on local ecological and drainage conditions established through appropriate assessment.</li> </ul>	<p>This is provided for in OSDM2 which states that ‘in terms of future enhancement, together with the improvements identified as part of the qualitative open space assessment, it is an objective of Kilkenny county Council to;</p> <ul style="list-style-type: none"> <li>Protect and enhance the strategic role of areas likely to flood, through the identification of a flood risk buffer and linear park, where appropriate, alongside the Kings River and elsewhere where surface water features are present’.</li> </ul>
<ul style="list-style-type: none"> <li>There will be no development of sites within the 20 m buffer zone either side of the King’s River.</li> </ul>	This proposed mitigation measure has been revised. No adverse effects anticipated if the proposed zoning is adhered to in-combination with the proper implementation of the revised mitigation measures as set out in the NIR.
<ul style="list-style-type: none"> <li>Contractors appointed to undertake the works will be informed of the sensitivities of the King’s River and will be expected to provide site specific method statements detailing measures taken to protect the environment during all phases of works.</li> </ul>	Section 1.4 of the Local Area Plan
<ul style="list-style-type: none"> <li>If it is proposed to abstract water from the river or where drawdown from abstraction may affect the hydrological regime of the river and the features of interest of the SAC a suitably qualified hydrogeologist must be appointed to assess the zone of influence.</li> </ul>	<p>Addressed by LAP Objectives IN2 and IN6.</p> <p>Any potential for impacts will be captured at planning application stage as per objective 1A and 1B.</p>
<b>Material Assets</b>	
<ul style="list-style-type: none"> <li>Applications for development within or adjacent to a Site on the Sites and Monument Register or the zone of archaeological potential should submit an archaeological assessment detailing the impacts which the relevant development</li> </ul>	Addressed by LAP Objectives BHDM 5 and BHDM 6.



Environmental Topic	Provision in the LAP
<p>would have on archaeology in the area.</p>	
<ul style="list-style-type: none"> <li>Development on the floodplain should be restricted. In regeneration areas, redevelopment proposals should exclude vulnerable uses.</li> </ul>	<p>Addressed by LAP Objectives FDM1-FDM5.</p>
<ul style="list-style-type: none"> <li>A wider strategy for festivals and events should perhaps include a strategy to reduce the level of waste generated.</li> </ul>	<p>Proposed mitigation measure not within the scope of this LAP.</p>
<p><b>Cultural Heritage</b></p>	
<ul style="list-style-type: none"> <li>Include policies to ensure that new development has a minimal impact on protected structures, important archaeological features, and structure on the national inventory of architectural heritage</li> </ul>	<p>Addressed by LAP Objectives BHDM 1- BHDM 8.</p>
<ul style="list-style-type: none"> <li>Development in or close to the high street and particularly for buildings that may be visually prominent should require visual impact assessments.</li> </ul>	<p>Addressed by LAP Objective BNH2</p>
<p><b>Landscape</b></p>	
<ul style="list-style-type: none"> <li>Appropriate screening and planting should be incorporated on visually prominent sites</li> </ul>	<p>Objectives 8G and 8H within the County Development Plan discuss visually prominent viewpoints and screening. Callan does not fall within the viewpoints of Map 8.2 and is therefore compliant.</p>
<ul style="list-style-type: none"> <li>Reduce or minimise light pollution through appropriate design solutions e.g. full cut off lighting</li> </ul>	<p>Addressed by LAP Objective NHB – DM8</p>
<ul style="list-style-type: none"> <li>Development to be restricted on the floodplain</li> </ul>	<p>Addressed by LAP Objectives FDM1-FDM5</p>
<ul style="list-style-type: none"> <li>New pedestrian/cycle bridge infrastructure should consider the need for project level Appropriate Assessment in order to avoid impacts on designated biodiversity sites.</li> </ul>	<p>Any potential for impacts will be captured at planning application stage as per objective 1A and 1B.</p>
<p><b>Water and Soil</b></p>	
<ul style="list-style-type: none"> <li>Ensure that adequate capacity in the waste water treatment plant is available to serve all new development</li> </ul>	<p>Addressed by LAP Objective IN2</p>

Environmental Topic	Provision in the LAP
<ul style="list-style-type: none"> <li>Ensure that adequate capacity in water supply is available to serve new development</li> </ul>	Addressed by LAP Objective IN2
<ul style="list-style-type: none"> <li>Focus development where possible initially on brownfield land</li> </ul>	Provided for by the Core Strategy
<ul style="list-style-type: none"> <li>To encourage the reuse of topsoil generated from housing and other development</li> </ul>	Addressed by Section 1.4.
<ul style="list-style-type: none"> <li>Incorporate SuDS and attenuation measures to reduce level of surface water discharge into the main watercourses.</li> </ul>	Addressed by LAP Objectives FDM3-FDM4
<b>Population and Human Health</b>	
<ul style="list-style-type: none"> <li>The Plan should identify measures to support sustainable forms of transport;</li> </ul>	Addressed by LAP Objectives TSDO1 - TSDO10
<ul style="list-style-type: none"> <li>The Plan should seek to improve accessibility to employment, education, healthcare, local food and to a range of housing types and community and recreation facilities</li> </ul>	Provided for by the Core Strategy
<ul style="list-style-type: none"> <li>The plan should discourage new residential development adjacent to the N76.</li> </ul>	Provided for by development buffer on zoning and development objectives maps
<b>Air</b>	
<ul style="list-style-type: none"> <li>Support for sustainable forms of transport would have a beneficial effect as well as slower speeds</li> </ul>	Addressed by LAP Objectives TSDO6 and TSDO7.
<b>Climatic Factors</b>	
<ul style="list-style-type: none"> <li>The Plan should promote sustainable modes of travel</li> </ul>	Addressed by LAP Objectives TSDO6 and TSDO7.
<ul style="list-style-type: none"> <li>The Plan should encourage use of sustainable design and construction methods</li> </ul>	Addressed by LAP Objectives EO1 and EO2 as well as Section 1.4.
<ul style="list-style-type: none"> <li>The Plan should require energy efficiency in new development</li> </ul>	Addressed by LAP Objectives EO1 and EO2
<ul style="list-style-type: none"> <li>The Plan should require the inclusion of decentralised / renewable energy systems</li> </ul>	Addressed by LAP Objectives EO1 and EO2

### **2.4.3 Preparation of the Environmental Report for the Material Alteration to the Draft LAP**

The Material Alterations were subject to SEA Screening, and the findings of this process resulted in the preparation of an Environmental report which went on public display along with the proposed amendments (Material Alterations).

Taking into account the measures which have been already integrated into the Draft Plan, as outlined in Table 2-1 above, no further mitigation measures were proposed as a result of the Environmental Report of the material alterations. It was determined that all potential effects arising from the adopted LAP are either present already and will not change or will be mitigated so as not to be significant. None of the objectives in the adopted LAP conflict with the status of any of the SEOs.

Additional mitigation measures were however proposed by way of the Natura Impact Report for the LAP.

## 3.0 Environmental Report Submissions and Observations

### 3.1 Introduction

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

### 3.2 SEA Scoping Submissions

The Planning and Development (SEA) Regulations, 2004 (as amended) requires the notification of the Environmental and Planning Authorities of Kilkenny County Council’s intention to carry out an environmental assessment indicating that submissions or observations in relation to the scope and detail of the information to be included in the environmental report can be made to the Council. In the case of the Callan Local Area Plan, this notice was issued on 7th August 2018. A summary of submissions received can be found in Table 3-1 below.

**Table 3-1: Submission Summary at Scoping Stage of the LAP**

Submission ref.	Summary	Recommendation
P1	<p>A response was received from the EPA on the 23 August 2014, which included an SEA pack for all Local Authorities to incorporate in carrying out the Environmental Report. For land use plans at county and local level, the EPA referred to a ‘self-service approach’ via the guidance document ‘SEA of Land Use Plans – EPA Recommendations and Resources’.</p> <p>Where the EPA provide specific comments on plans and programmes, comments will focus on the EPA’s remit and areas of expertise (in particular water, air, climate change, waste, resource efficiency, noise, radon and the inter-relationships between these and other relevant topics e.g. biodiversity), as appropriate and relevant to the particular plan or programme.</p>	<p>Consideration was given to the guidance document ‘SEA of Land Use Plans – EPA Recommendations and Resources’</p>
P2	<p>A response was received from the Department of Arts, Heritage and the Gaeltacht on the 4 September 2018 in relation to Nature Conservation. The observation is primarily concerned with the issues of biodiversity, fauna and flora. The response refers to the following considerations:</p> <ul style="list-style-type: none"> <li>• Links with appropriate assessment;</li> <li>• Integration of Biodiversity, Flora and Fauna, and associated obligations, into the Plan;</li> </ul>	<p>A nature conservation section was included.</p>

Submission ref.	Summary	Recommendation
	<ul style="list-style-type: none"> <li>• Implications of the Plan/Programme, or modification thereof, for Biodiversity, Flora and Fauna;</li> <li>• Scope of the Strategic Environmental Assessment;</li> <li>• Strategic Environmental Objectives;</li> <li>• Scope of Environmental Report; and</li> <li>• Data/information sources.</li> </ul>	

### 3.3 Submissions and Observations at Pre-Draft Stage

Pre-draft public consultation regarding the plan took place between 20<sup>th</sup> June 2018- 20<sup>th</sup> July 2018. A public consultation event was conducted on the 27<sup>th</sup> June 2018 at the Callan Parish Hall, Green Street, Callan.

A total of nine submissions were received by Kilkenny County Council during this period. None of the submissions related specifically to the SEA. These submissions are summarised in Table 3-2 below and where appropriate were incorporated into the Draft LAP.

**Table 1-2: Submission Summary at Pre-Draft Stage of the LAP**

Submission Reference	Summary
KK-C69-CDP18-1	<ul style="list-style-type: none"> <li>• Traffic Calming Measures on upper and lower Bridge Street</li> <li>• A new town bridge built from the old Heiton Buckley site to pedestrianise Bridge St.</li> <li>• Storm water/sewerage flooding properties on Bridge St.</li> <li>• Bridge Street as a cultural quarter</li> <li>• Matters for the town renewal plan...sustainable energy initiatives, town bottle scheme, signage</li> <li>• Riverside plan akin to the Thomastown model</li> </ul>
KK-C69-CDP18	<ul style="list-style-type: none"> <li>• Need for a Civic outdoor space</li> <li>• Mill Race Pedestrianisation Path</li> </ul>
KK-C69-CDP18-3	<ul style="list-style-type: none"> <li>• Bus stop location Steppes Bar</li> <li>• No pedestrian footpath along Chapel Ave from the junction with Green St to Aldi shop</li> <li>• Refresh the playground</li> <li>• Parking and pedestrian safety on Bridge Street</li> <li>• A number of areas is required to reduce the Industrial zoning. The residential zoning appears to be apt with proposed growth and the zoning of the GAA ground &amp; fare green to Amenity space is required.</li> <li>• Management of community facilities... Friary hall, GAA Club, Parish Hall.</li> <li>• Historical Tourism offer</li> </ul>

Submission Reference	Summary
	<ul style="list-style-type: none"> <li>• Time limit on parking on main streets.</li> </ul>
KK-C69-CDP18-4	<ul style="list-style-type: none"> <li>• Redevelop Property on West Street/Bridge street – scope for parking and pedestrian access</li> <li>• The potential use of Moate Field as a Town Park</li> <li>• To develop 3 townhouses in Bridge Street</li> </ul>
KK-C69-CDP18-5	<ul style="list-style-type: none"> <li>• Soft landscaping should be included in the Town Renewal Plan</li> <li>• Additional Resources for the Parks Department</li> <li>• Mill Street, underground cabling</li> <li>• Bridge St.: To pave and landscape the street to make it ‘pedestrian priority’ area</li> <li>• Regenerating/developing the existing housing and derelict/underutilised sites in the town. E.g. old co-op site could be the core site for a re development project in the town.</li> <li>• Opening vistas to green spaces</li> <li>• Future development of a sports and leisure facility</li> <li>• Provision of a new library</li> <li>• Lighting of three national monuments</li> </ul>
KK-C69-CDP18-6	<ul style="list-style-type: none"> <li>• Develop community led regeneration of Bridge Street</li> <li>• Arts-led regeneration – Studio Weave’s narrative</li> <li>• Housing - participatory design processes</li> <li>• Vacant properties</li> <li>• Upgrading the sewage system</li> <li>• Public space for Young people - Young people commented on the lack of designated space for their age group to hang-out safely - a safe swimming spot, areas to congregate safely in the town centre were top priorities.</li> <li>• Explore possibilities for an “Abbey Meadow Town square”</li> <li>• Civic Cluster at Callan Workhouse</li> <li>• Footpaths and separate cycle lanes, also wheelchair accessible</li> <li>• Studio Weave’s Bridge Street narrative</li> </ul>
KK-C69-CDP18-7	<ul style="list-style-type: none"> <li>• Traffic management, safety for pedestrians (especially those with mobility issues), dereliction and darkness.</li> <li>• Looped Riverwalk in the Abbey Meadow and Moate field areas which I hope will be included in the next Callan Local Area Plan</li> <li>• Friary Complex</li> <li>• Upgrade temporary pedestrian bridge</li> <li>• Shared Space Approach Bridge, Mill and West Streets</li> <li>• A thorough architectural heritage survey – Town Renewal Plan</li> <li>• Resources for the cultural organisations to offer a tourist experience – Town Renewal Plan</li> </ul>

Submission Reference	Summary
	<ul style="list-style-type: none"> <li>Weekend experience /a Saturday market at the front of the old Callan co-op building – Town renewal Plan</li> </ul>
KK-C69-CDP18-8	<ul style="list-style-type: none"> <li>Community cohesion and diversity</li> <li>Vision of Callan as an “Inclusion Town”</li> <li>Measures to enhance accessibility in all public places, both indoors and outdoors</li> <li>Workhouse Integrated Civic Zone</li> <li>Specific Proposal: A Facilitated Participative Planning process engaging all residents and stakeholders, with an emphasis on a creative input, to Re-Imagine the original site as a Demonstration Project of Inclusive Planning</li> <li>Specific Proposals: 1) Environmental improvements to the natural life of the King’s River 2) Enhanced access from the town environment to a linear Green Zone linking the Abbey Meadow, Moat Fields and Westcourt House along the King’s River 3) Incentives for new and existing retail trading opportunities 4) Improved Traffic Management, including consideration of pedestrianisation of Bridge St. 5) Creation of a landscaped “Town Square” area in the current Mill Lane Car Park 6) A new plan for the restoration and enhancement of the Mill Race</li> </ul>
KK-C69-CDP18-9	<ul style="list-style-type: none"> <li>Develop the Abbey Meadow, Moat Fields Trail and the King’s River area as visitor attractions and also to upgrade the Mill Lane Car Park into a visitor friendly area where social events can take place</li> </ul>

### 3.4 Submissions and Observations on the Environmental Report

A Draft Local Area Plan and Environmental Report were published on 8th of November 2018 and remained on public display until 20th of December 2018. These documents were on display on the Council’s website, the planning office of Kilkenny County Council, the Callan Library and the Callan Area Office during this 6 week consultation period. A total of 16 submissions were received in total, of which 3 referred to the SEA.

Responses to submissions made on the Environmental Report and AA and SFRA documents during the period of public display were integrated into a Chief Executive’s Report and considered by Kilkenny County Council. The extract from the CE’s Report in relation to these 3 submissions are summarised in Table 3-3 below together with the recommended changes in response to these submissions.

**Table 3-3: Submission Summary at the Draft Stage of the LAP**

Ref	Name	Summary
CD-1	Seamus Ryan	1. The submission welcomed the content of the Environmental Report but requested that the exact locations of these invasive plants, e.g., Japanese Knotweed, Himalayan Balsam etc. be identified. It states that the maps in the Environmental Report do not accurately show where invasive species actually exist within the town eg. Garda Station on Green Street.
<p><b>Response:</b></p> <p>Clearer identification of invasive species locations throughout the County is an ongoing project and is currently being addressed by the Council. It is however recommended that policies be included to firstly compile a Green Infrastructure Strategy and secondly to ensure that awareness of invasive species and control of same forms part of the green infrastructure strategy when this is prepared.</p>		
<p><b>Recommendation:</b></p> <p>Revise Green Infrastructure Objective to state that ‘It is an objective of Kilkenny County Council to develop a Green Infrastructure Strategy for the town, linked to its urban regeneration’. An additional natural heritage and biodiversity objective will also be included: NHB6: It is an objective of Kilkenny County Council to promote best practice in the control of invasive species, to raise awareness in relation to invasive species and to ensure that proposed projects do not lead to the spread of invasive species.</p>		

Ref	Name	Summary
CD-12	Department of Culture, Heritage and the Gaeltacht	<p>The AA screening report and Natura Impact Report</p> <ol style="list-style-type: none"> <li>1. Page 21 states that the outcome of a review of the status of Freshwater Pearl Mussel (<i>Margaritifera margaritifera</i>) as a qualifying interest will determine conservation objectives. In the interim, the most recently published conservation objectives for this species may be referenced (NPWS a or b).</li> <li>2. NHB5: Callan River Project, removal of sediment deposits and associated vegetation that has developed within the river channel in recent years. Objective NHB5 is likely to have significant effects on the River Barrow and River Nore SAC Site Code 2162 and the River Nore SPA Site Code 004233 and <b>therefore will require Appropriate Assessment</b>. Objective NHB5 should stipulate that the implementation of this project will be subject to the outcome of Appropriate Assessment.</li> <li>3. It is also suggested that Objective NHB5 includes <b>sediment analysis</b> and other investigations to determine the source and cause of the sediment build-up in the river.</li> <li>4. The Department considers that the proposed mitigation measures in relation to Objective NHB5 in the AA screening report and Natura Impact Report are insufficient to avoid adverse effects on the integrity of the River Barrow and River Nore SAC and River Nore SPA and suggests that a key mitigation measure should be that this project is</li> </ol>



Ref	Name	Summary
		<p>subject to Appropriate Assessment. In relation to other LAP objectives, where it is considered that AA of the projects arising from the objectives will be required, this should be stated explicitly under the mitigation measures heading.</p> <p>5. Invasive non-native plant and animal species can represent a major threat to local biodiversity, particularly along river corridors. It is suggested that the <b>Natural Heritage and Biodiversity – Objectives includes an objective to avoid the spread of alien invasive species, to promote best practice in the control of invasive species, to raise awareness in relation to invasive species and to ensure that proposed projects do not lead to the spread of invasive species.</b></p>

**Response:**

1. Noted, amendment to the Appropriate Assessment Screening Report and Natura Impact Report to be carried out. Conservation objectives were reviewed as suggested however the attributes and targets are site specific and overall were not considered to be applicable in this case.
2. Additional objectives will be added to Section 1.4 to emphasise that the process is hierarchical and projects arising from the local area plan will be subject to AA as required:
3. Hydraulic modelling was carried out for the stretch of river concerned for the purpose of the proposed works which was the basis for the recommendation to remove silt build up rather than altering the river channel to include a low flow channel as was first proposed. Informal consultation by project proponents took place with NPWS (District Conservation Officer). A planning application and associated AA will be submitted to KCC in due course and the Department will be consulted formally at that stage.
4. Noted, additional objectives to be included.
5. Noted, additional objective to be included.

**Recommendation:**

1. To complete the following amendment to paragraph 1.46 of the Appropriate Assessment Screening Report and Natura Impact Report

*‘..... the outcome of this review will determine whether a site-specific conservation objective is set for this species. The current condition, which informs the ‘integrity’ of a qualifying freshwater pearl mussel population can be considered to consist of the condition of the species’ habitat and the condition of the population itself.’ <sup>2</sup>*

*Environmental objectives and targets as outlined in the European Communities (Freshwater Pearl Mussel) Regulations 2009 (S.I. 296 of 2009), as amended by the European Union*

<sup>2</sup> Taken from information on AA and Freshwater Pearl Mussel available on the NPWS website at: <https://www.npws.ie/research-projects/animal-species/invertebrates/freshwater-pearl-mussel/appropriate-assessment-and>

Ref	Name	Summary
		<p><i>Environmental Objectives (Freshwater Pearl Mussel) (Amendment) Regulations 2018 (S.I. No. 355/2018) may also be referenced.</i></p> <p>2. Objective 1A and 1B inserted under Section 1.4 will ensure that all projects that require AA will be subject to same. Insert objectives 1A and 1B as follows into Section 1.4</p> <p><b>Objectives:</b></p> <p><b>To implement the provisions of Articles 6(3) and 6(4) of the EU Habitats Directive.</b></p> <p><b>To ensure that any plan or project within the functional area of the Planning Authority is subject to appropriate assessment in accordance with the Guidance Appropriate Assessment of Plans and Projects in Ireland – Guidance for Planning Authorities, 2009<sup>3</sup> and is assessed in accordance with Article 6 of the Habitats Directive in order to avoid adverse impacts on the integrity and conservation objectives of the site.</b></p> <p>3. In relation to the Callan River project, no change is proposed.</p> <p>4. It is recommended that the following Natural Heritage and Biodiversity Objective is included in the Draft Plan;</p> <p><i>“NHB6: It is an objective of Kilkenny County Council to avoid the spread of alien invasive species, to promote good practice in the control of invasive species and to raise awareness in relation to invasive species present within the LAP area and thereby preventing the spread of invasive species.”</i></p>

Ref	Name	Summary
CD-13	Irish Water	<p>1. The submission refers to text in section 9.1 of the Draft Callan LAP: Water Services and requests that text be added</p> <p>2. A Menu of appropriate Objectives/Policies for Water Services in development plans was also attached to the submission. It is proposed that these objectives be appended to the Plan as Appendix 3 and that a policy be included.</p>
<p><b>Response:</b></p> <p>1. Noted, Text changes to the Draft LAP to be amended as per Irish Water’s submission.</p> <p>2. Insert objective to have regard to the suite of objectives as requested by Irish Water and to be attached as Appendix 3.</p>		
<p><b>Recommendation:</b></p> <p>1. The following amendments to section 9.1 of the Draft Callan LAP: Water Services is proposed. <i>‘Irish Water’s 2020-2024 Investment Plan has been submitted to the Commission for Regulation of Utilities (RCU); further details can be found on the CRU website at www.cru.ie.</i></p> <p>The following amendments to section 9.1 of the Draft Callan LAP: Waste Water Treatment is proposed. <i>‘The existing treatment plant in Callan has a design capacity for population of 4000pe</i></p>		

<sup>3</sup> ibid

Ref	Name	Summary
		<p>and all the majority of properties within the town are connected to the WWTP via the wastewater network serving the town. <del>However it's</del> The network is a combined system with mixed storm and foul water which can be problematic when flood events occur. The town also has a proliferation of pumping stations. <i>The Callan network has been included on the national stormwater overflow (SWO) survey and assessment programme, which has commenced and will take 2-3 years to complete. A strategic assessment of the towns existing network of pumping stations is required and</i> the requirement for additional stations should be limited where possible. <del>Within Irish Water's Draft Investment Plan a provisional and draft list of projects and programmes is provided. The projects and programmes listed are expected to be commenced, progressed or completed during the 2020-2024 period. Callan WWTP is included under this list and Table 15 provides an extract from the supplementary capacity register. However, in relation to headroom (PE), the register states that the available capacity is not confirmed until environmental and asset assessments are completed. In terms of additional comments in relation to the Callan WWTP, it also states that more stringent Emission Limit Values are required from 2020.</del></p> <p>The following amendments to section 9.1 of the Draft Callan LAP: Water Supply is proposed. The supply of water for Callan is met from a local spring source supplemented by a borehole supply. The spring capacity is approximately 30-35 cu/hr which is then topped up from the borehole supply. Demand is currently running at 45-48 cu/hr and whilst this capacity is being met at the moment, the capacity of the borehole is unknown. <del>This renders the overall water supply infrastructure functional but tenuous in respect of future development. There is sufficient pressure in the network at present. The key issue is the maintenance of sufficient head at the water tower and pipe restrictions within the network. While capacity for further development is limited at present, further studies/surveys can be completed over the medium term to confirm the capacity of the sources, in order to determine how much new development can be accommodated; and if investment is needed it shall be in line with the relevant Irish Water policies.</del></p> <p>The following amendments to section 9.1 of the Draft Callan LAP: Infrastructure – Development Objectives is proposed. 'IN3: It is an objective of Kilkenny County Council to align future development with capacity at the Callan Waste Water Treatment Plant to ensure that <i>any</i> improvements <i>needed</i> are sufficient to meet standards required to avoid significant adverse effects on the River Nore and River Barrow SAC.'</p> <p>The following amendments to Section 5.1.2 of the Draft Strategic Environmental Assessment is proposed. <del>Reduction in water quality (this will depend on the provision of additional waste water treatment facilities);</del> <i>Irish Water has advised that the available capacity of the Callan WWTP to cater for future development is currently under review and subject to environmental asset surveys.</i></p> <p>Noted, the following bullet point is proposed to the text in relation to the Mill Street Potential Redevelopment Area in Chapter 10 (section 10.6.2) <i>Consult with key stakeholders including Irish Water to ensure that there is no conflict with nearby above or below ground assets. (it is recommended that a footnote is included to read as follows: The masterplan area is located in close proximity to the following above or below ground assets which belong to Irish Water. They include the wastewater pumping station at Clodeen Lane and Irish Water water mains and sewer pipes. It is also noted that there is both a wastewater rising main and a watermain crossing the King's River in close proximity to the Clodeen Lane pump station and hence close to the proposed pedestrian and cycle bridge.)</i></p>

Ref	Name	Summary
		<p>It is proposed that the suite of appropriate Objectives/Policies for Water Services as recommended by Irish Water be appended to the Plan as Appendix 3 and that the following objective be inserted:</p> <p><i>“IN6: To have regard to the suit of Irish Water objectives for development as set out in Appendix 3 in assessing applications for all new developments within this Local Area Plan.”</i></p>

### 3.5 Submissions and Observations on the Proposed Material Alterations

The Proposed Material Alterations to the Draft Plan and Environmental Report were published on 8th February 2019 and remained on public display until 8th March 2019. During the 4 week consultation period, a total of 5 submissions were received of which 5 referred to the SEA or topics relevant to the SEA. The extract from the CE’s Report in relation to these 5 submissions are summarised in Table 3-4 below, together with the Council’s Response and recommended action.

**Table 3-4: Submissions Summary at Material Alterations Stage of the LAP**

Ref	Name	Summary
<b>KK-C95-2</b>	<b>EPA</b>	<p>The EPA requests that KCC considers including a commitment that a Construction Environmental Management Plan (CEMP) is required in relation to the removal of the buffer zone surrounding the river. The plan will ensure that appropriate mitigation measures and associated monitoring are adequately implemented.</p>
<p><b>Response:</b> The following measure was (and continues to be) included in Table 4 of the NIR for the draft LAP “Contractors appointed to undertake any construction works within Callan town centre, areas in close proximity to the King’s River or where there is an ecological connection to the river will be informed of the sensitivities of the King’s River and will be expected to provide site specific method statements detailing measures taken to protect the environment during all phases of works.”</p> <p>Project specific Method Statements and, as appropriate, CEMP would accordingly be required as standard for development projects within the LAP area and particularly for development along the King’s River within Callan town to ensure appropriate measures and monitoring is implemented at project stage.</p>		
<p><b>Recommendation:</b> No change recommended.</p>		

Ref	Name	Summary
<b>KK-C95-5</b>	<b>Irish Water</b>	<p><b>Summary:</b> Welcomes the inclusion of Irish Water’s ‘Menu of Appropriate Objectives/Policies for Water Services in Development Plans’ in the Proposed Material Alterations to the Draft Callan LAP. Irish water suggests including the update to this menu (p.25 of Material Alterations) which is in the body of the online submission and not the attachment. Text as follows:</p>

Ref	Name	Summary
		<p>“Menu of appropriate Objectives/Policies for Water Services in Development Plans</p> <p>General Policies in relation to Water Services</p> <p>a) To work closely with Irish Water to identify and facilitate the timely delivery of the water services required to realize the development objectives of this plan;</p> <p>b) To consult with Irish Water in the development of Plans, SDZs, etc in order to ensure the proposed spatial strategy takes account of:</p> <ul style="list-style-type: none"> <li>- the available capacity of the public water services infrastructure;</li> <li>- the need to protect and optimise existing and planned public water services infrastructure;</li> <li>- the need for sequential and phased development;</li> <li>- the financial and environmental implications of development in sensitive areas.</li> </ul> <p>c) Prior to granting planning permission the Council will ensure that adequate water services will be available to service development, and will require developers to provide evidence of consultation with Irish Water prior to applying for planning permission;</p> <p>d) To protect existing way leaves and buffer zones around public water services infrastructure through appropriate zoning and to facilitate the provision of appropriate sites for required water services infrastructure as necessary;</p> <p><b>Water Supply</b></p> <p>e) To protect both ground and surface water resources including taking account of the impacts of climate change, and to support Irish Water in the development and implementation of Drinking Water Safety Plans and the National Water Resources Plan;</p> <p>f) To promote water conservation and demand management measures among all water users, and to support Irish Water in implementing water conservation measures such as leakage reduction and network improvements.</p> <p><b>Wastewater Services</b></p> <p>g) To ensure that the Local Authority provides adequate storm water infrastructure in order to accommodate the planned levels of growth within the plan area and to ensure that appropriate flood management measures are implemented to protect property and infrastructure;</p> <p>h) To require all new development to provide a separate foul and surface water drainage system and to incorporate sustainable urban drainage systems where appropriate;</p> <p>i) To prohibit the discharge of additional surface water to combined (foul and surface water) sewers in order to maximise the capacity of existing collection systems;</p> <p>j) To support Irish Water in the promotion of effective management of trade discharges to sewers in order to maximise the capacity of existing sewer networks and minimise detrimental impacts on sewage treatment works;</p>

Ref	Name	Summary
		<p>k) o ensure that all new developments connect to the public wastewater infrastructure, and to encourage existing developments that are in close proximity to a public sewer to connect to that sewer, subject to a connection agreement with Irish Water;</p> <p>l) To ensure that the provision of private wastewater treatment facilities for residential development, other than single house systems, should not generally be considered by planning authorities. Irish Water will not retrospectively take over responsibility for developer provided treatment facilities or associated networks, unless agreed in advance;</p> <p>m) The provision of single house septic tanks and treatment plants in the Plan area will be strongly discouraged to minimise the risk of groundwater pollution. Where such facilities are permitted, full compliance with the prevailing regulations and standards, including the EPA’s Code of Practice Wastewater Treatment and Disposal Systems Serving Single Houses (PE. ≤10) (EPA 2009), as may be amended, will be required;</p> <p>n) To ensure that private wastewater treatment plants, where permitted, are operated in compliance with their wastewater discharge license, in order to protect water quality.”</p> <p>Irish water has no further comments to make.</p>
<p><b>Response:</b> Update noted.</p>		
<p><b>Recommendation:</b> Include updated menu of appropriate Objectives/Policies for Water Services in Development Plans.</p>		

Ref	Name	Summary
KK-C95-6	Peter Sweetman	<p>The submission refers to a number of CJEU judgements and Case C-258/11, Peter Sweetman and Others v An Bord Pleanála in particular. In reference to C-258/11 it refers to 44:</p> <p>“So far as concerns the assessment carried out under Article 6(3) of the Habitats Directive, it should be pointed out that it cannot have lacunae and must contain complete, precise and definitive findings and conclusions capable of removing all reasonable scientific doubt as to the effects of the works proposed on the protected site concerned.”</p> <p>This screening cannot state that, as the mitigation measures are of a general nature.</p>
<p><b>Response:</b> A full Natura Impact Report (NIR) was prepared for the draft Local Area Plan (LAP) and also for the material alterations to the Draft LAP. The document titled “Appropriate Assessment Screening Report and Natura Impact Report”, contained a screening decision to proceed to the next stage i.e.. a full stage 2 Appropriate Assessment and the compilation of a NIR. The Natura Impact Report considered all the potential impacts of the Material Alterations on the integrity of the Natura 2000 sites.</p>		

Ref	Name	Summary
		<p>All relevant legislative and associated requirements in relation to AA have been fulfilled to date.</p> <p>Before adoption of the Plan, as is required by the legislation, an Appropriate Assessment (AA) Determination pursuant to the Planning and Development Act 2000, as amended, and for the purposes of Article 6(3) of the Habitats Directive will be made by the Council. This determination will carefully consider the reasoning and conclusions of all AA-related output prepared to date.</p> <p>All other documents prepared and submitted during the Plan preparation process will also be considered in making this determination including the Plan for adoption (including any alterations and/or modifications) and written submissions made on the Draft Plan and associated documents while they were on public display.</p> <p>Table 4 of the NIR sets out objective specific measures. In addition, the NIR for the draft LAP clearly states that projects arising from the plan / within the plan area will be subject to measures set out in the NIR as well as assessment of the effects on Natura 2000 sites at individual project level.</p> <p>The risks to the ecological integrity of the European Sites, taking account of the qualifying interests, special conservation interests and conservation objectives, have been addressed by the inclusion of the aforementioned measures that will prioritise the avoidance of effects in the first place and mitigate effects where these cannot be avoided. In addition to the measures featured within the Plan, all lower level plans and projects arising through the implementation of the Plan will themselves be subject to AA when further details of design and location are known.</p> <p>Having incorporated these mitigation commitments; the emerging determination it that adoption and implementation of the Plan will not have a significant adverse effect on the ecological integrity of any European Site, either individually or in combination with any other plan or project.</p> <p>Although the submission implies that the document is only a screening document, this is clearly not the case and all potential impacts are carefully considered, and the findings are precise and definitive, and thus, through the conclusion, all scientific doubt as to the effects on protected sites is removed.</p> <p><b>Recommendation:</b></p> <p>No further change.</p>

Ref	Name	Summary
KK-C95-7	Christopher O'Keeffe	<p>1. Submission states 4 documents are available at Consult.Kilkenny.ie, being:</p> <ul style="list-style-type: none"> <li>• Proposed Material Alterations to the Draft Callan LAP</li> <li>• SEA of proposed Material Alterations</li> <li>• SFRA of Proposed Material Alterations to Callan Draft LAP</li> <li>• AA of Proposed Material Alterations to the Callan Draft LAP</li> </ul> <p>However, the submission further states that none of these documents are available at the Kilkenny City Library.</p> <p>It is submitted that all documents which are part of public</p>

Ref	Name	Summary
		<p>consultations should be available in all public libraries during the consultation period.</p> <ol style="list-style-type: none"> <li>2. The required documentation, being “Environmental report” (1), “Appropriate Assessment Screening” (2) and “Natura Impact Statement”(3) were not available. The submissions states that all documentation, including Environmental reports, appropriate Assessment Screening and Natura impact Statement (NIS) which are part of the consultation should be available online at <a href="http://Concult.kilkenny.ie">Concult.kilkenny.ie</a>.</li> <li>3. The NIS is flawed as at screening stage, it is not appropriate to take into account measures intended to avoid or reduce the harmful effects, of the plan or project on that site. Reference is made to several ECJ cases related to the Habitats directive and Appropriate Assessment. Ruling quoted stating that an assessment cannot have lacunae and must contain complete, precise and definitive findings removing all scientific doubt of effect of works on site concerned.</li> <li>4. Kilkenny county Council should follow guidelines “Managing Natura 2000 sites – The provisions of Article 6 of the Habitats Directive 92/43EEC” Brussels 21/11/2018</li> </ol>

**Response:**

1. Hard copies of all the documents were available at:

- the Planning Office, John Street, Kilkenny
- The Callan Library
- The Callan Area Office

Electronic copies were available online and hence could be accessed at all the County’s libraries, including the Kilkenny City Library.

2. (1) The “Environmental Report” is available online with the Draft LAP for Callan on [Consult.Kilkenny.ie](http://Consult.Kilkenny.ie). (2+3) The “Appropriate Assessment Screening report” and “Natura Impact Statement” (referred to as Natura Impact Report) were published in a single document titled “Appropriate Assessment Screening Report and Natura Impact Report”, which was made available online at [Consult.Kilkenny.ie](http://Consult.Kilkenny.ie) and in hard copy at the Council offices in John Street, Kilkenny, the Callan area office and at the Callan Library.

3. A Natura Impact Report was prepared, and an appropriate assessment carried out for the draft LAP and the material alterations to the Draft Local Area Plan. The document titled “Appropriate Assessment Screening Report and Natura Impact Report”, contained a screening decision and a full stage 2 NIR. Mitigation measures were not proposed at the screening stage but at the second stage of the process i.e. NIR.

4. Although the submission implies that the document is only a screening document, this is clearly not the case and all potential impacts are carefully considered in the Natura Impact Report and the findings are precise and definitive, and thus, through the conclusion, all scientific doubt as to the effects on protected sites is removed.



Ref	Name	Summary
5.		The NIR will be updated to include, inter alia reference to the EU notice titled “Managing Natura 2000 sites- The provisions of Article 6 of the Habitats Directive 92/43EEC Brussels, 21/11/2018.
<p><b>Recommendation:</b></p> <p>No further change.</p>		

Ref	Name	Summary
KK-C95-8	Enya Kennedy	<p>The submission states that</p> <ol style="list-style-type: none"> <li>1. It is unclear whether the Conservation Objectives will be met under this plan</li> <li>2. There have been no scientific surveys undertaken as part of the report, no report from Irish Water to indicate as to whether current waste water treatment plants have been assessed under this plan.</li> <li>3. A stage 2 Appropriate Assessment screening report needs to be carried out.</li> </ol>
<p><b>Response:</b></p> <ol style="list-style-type: none"> <li>1. The purpose of the LAP is to provide for the proper planning and sustainable development of Callan town. The purpose of the Natura Impact Report which has been completed for the Draft LAP as well as for subsequent material alterations is to set out the implications for the site in view of the conservation objectives (See Paragraph 1.71 of the NIR) of the Natura 2000 site in question. Table 3 sets out the potential effects on key species and habitats of the River Barrow and River Nore SAC and the River Nore SPA. The NIR sets out conservation objectives of the Natura 2000 sites with potential to be affected by the proposed LAP. The NIR sets out the effects on the integrity of Natura 2000 sites, in the absence of mitigation, at Paragraph 1.80. The assessment was done based on best scientific methodology and evidence as required in accordance with the Ministerial guidance “Appropriate Assessment of Plans and Projects- guidance for Planning Authorities” (DoEHLG 2009).</li> <li>2. The LAP objectives are strategic in nature and as such the potential impacts and effects are rather broad in nature. Irish Water made a submission and has no objections to the Material Alterations as proposed. The plan was based on the draft Callan Stage 1 Wastewater Capacity Register which shows headroom of multiples of the anticipated population increase in the current capacity of the Callan Wastewater Treatment Plant. A mitigation measure is however still included which requires that wastewater, surface water drainage and drinking water must be in place prior to any development. Also, every subsequent development project/application will be subject to full assessment in accordance with the Habitats Directive requirements and will have the mitigation measure above as a prerequisite.</li> <li>3. A Natura Impact Report was prepared, and an appropriate assessment carried out for the draft LAP and for the material alterations to the Draft Local Area Plan and is contained in the report “Appropriate Assessment Screening Report and Natura Impact Report” which accompanied the Material Alterations. Table 4 of the NIR sets out objective specific mitigation measures. In addition,</li> </ol>		

Ref	Name	Summary
		<p>the NIR for the draft LAP clearly states that projects arising from the plan / within the plan area will be subject mitigation measures set out in the NIR as well as assessment of the effects on Natura 2000 sites at individual project level. Where projects are considered likely to result in significant effects on Natura 2000 sites, or where the significance of such effects are uncertain then the individual projects will be required to undergo appropriate assessment and project specific mitigation measures will be required to avoid adverse effects on the integrity of Natura 2000 sites.</p>
		<p><b>Recommendation:</b> No further change.</p>

## 4.0 Alternatives and the Plan

### 4.1 Introduction

The SEA Directive requires that reasonable alternatives which take into account the objectives and the geographical scope of the plan or programme are identified, described and evaluated for their likely significant effects on the environment. However, the position of the plan within the decision making hierarchy predetermines the scope of strategic alternatives available.

The description of the environmental baseline (both maps and text) and Strategic Environmental Objectives (SEO's) are used in the evaluation of alternatives.

### 4.2 Description of Alternative Plan Scenarios

Three alternative development strategies for Callan were developed as follows:

#### **Alternative 1: Continued Consolidation**

Concentrated growth mainly into the existing urban centre of Callan, with little growth being allocated to rural areas. Access to existing infrastructure is a guiding principle of this approach.

#### **Alternative 2: Dispersed Growth**

Dispersed growth or 'Unlimited development' sets out a scenario where the future growth in Callan reflects requests for additional zoning.

#### **Alternative 3: Selection of New Growth Areas**

This alternative prioritises areas outside the existing urban centre of Callan, such as Windgap and Tullamaine.

### 4.3 Evaluation of Alternative Plan Scenarios

This section summarises the evaluation of the Alternative Scenarios that is found in Section 5.1.2 of the Environmental Report.

#### **4.3.1 Alternative 1: Continued Consolidation**

Alternative 1 concentrates growth mainly into the existing urban centre of Callan, with little growth being allocated to rural areas.

- This alternative concentrates populations into the existing centre of Callan, where existing infrastructure, services and facilities are found, including access to public transport.
- This allows a concentration of investment in key infrastructure. Valuable natural resources such as water quality are protected through targeted infrastructural measures.
- This alternative does not support the rural population, which may lead to a population decline in rural areas.

#### **4.3.2 Alternative 2: Dispersed Growth**

This scenario is one which places very few restrictions on development throughout the Plan area.

- The zoned land requirement, without prioritisation, would be distributed throughout the area.
- Development would be allowed to proceed in an ad hoc manner and would follow market forces.
- Most development would occur on greenfield sites outside the existing urban centre.
- Significant levels of incremental development i.e. ribbon development along roads within the plan area would result.

- Development would occur in un-serviced or in insufficiently serviced areas.
- This alternative would more than likely lead to a highly dispersed settlement pattern.
- This alternative could lead to a loss of population base within Callan and a loss of critical mass for the development of key services and facilities.
- Dispersal of rural housing and other non-agriculture related development in the countryside would lead to unsustainable transport patterns.
- Deterioration in ground water quality through the proliferation of septic tanks; surface water quality could be affected through contaminated ground water.
- Habitats and areas of natural interest could be lost or fragmented.
- Deterioration in landscape quality could ensue.

### 4.3.3 Alternative 3: Selection of New-Growth Areas

This alternative prioritises areas outside the existing urban centre of Callan, such as Windgap and Tullamaine.

- Both areas would be subject to large levels of zoning to accommodate the proposed population increase.
- Inadequate to no services in either area to serve such a population increase, resulting in an increase in unsustainable travel patterns.
- Large growth areas would likely form around both Windgap and Tullamaine and detract from the district town of Callan.
- Little brownfield development opportunities in Windgap and Tullamaine, resulting in most development taking place on the edges of the centres in un-serviced greenfield land.
- Likely increases replacement of agricultural land by artificial surfaces as a result in displaced development would cause environmental effects.
- The viability of existing services in Callan would be undermined by the dispersal of population.

## 4.4 Reasons for Choosing the Plan, as Adopted, in Light of Other Reasonable Alternatives

Table 4-1, following, shows an assessment contained in the Environmental Report of the three alternatives against each of the SEA Objectives:

**Table 4-1: Assessment of Alternatives**

	Alternative		
	1. Continued Consolidation	2. Dispersed Growth	3. Selection of New Growth areas
<b>Biodiversity, Fauna and Flora</b>			
Conserve and enhance the diversity of habitats and species, including designated sites which may be sensitive to development			

	Alternative		
<b>Population and Human Health</b>			
Improve the health and wellbeing of the population in Callan including relevant environmental health issues re air quality and noise	Green	Red	Red
<b>Water</b>			
Prevent pollution and contamination of groundwater	Green	Red	Red
Protect and improve river water quality in Callan	Green	Red	Red
Protect and improve water supply	Green	Red	Red
<b>Climate Factors / Material Assets</b>			
Adapt and mitigate the effects of climate change, including flood risk	Green	Red	Green
<b>Cultural Heritage</b>			
Protect and conserve Callan's cultural heritage, including areas of archaeological interest, protected structures, important monuments and sites and hedgerows	Green	Red	Green
<b>Landscape</b>			
Protect and enhance valued natural and historic landscapes and features within them.	Green	Red	Green
<b>Soil</b>			
Protect and enhance soil	Green	Red	Red

Having considered the three alternatives, Alternative 1: Continued Consolidation emerges as the preferred alternative, as this has the fewest potentially negative impacts on the planning policy objectives (PPOs) and Environmental Policy Objectives (EPOs).

## 5.0 Monitoring Measures

### 5.1 Introduction

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section outlines the measures for monitoring the likely significant effects of implementing the Plan.

Table 5-1 overleaf shows the indicators and targets which have been selected for monitoring the likely significant environmental effects of implementing the Plan, if unmitigated. The Monitoring Programme may be updated to deal with specific environmental issues - including unforeseen effects - as they arise. Such issues may be identified by the Council or identified to the Council by other agencies.

**Table 5-1: Monitoring Proposals for Environmental Categories**

Environmental Category	Targets	Selected Indicators	Data Sources	Monitoring Frequency
<b>Biodiversity, Flora and Fauna</b>	No loss of important and/or designated habitats	Number of sites.	Kilkenny County Council/National Parks and Wildlife Service/Fisheries Board	Ongoing depending on available information from relevant statutory authorities
	No deterioration in the quality of protected areas	Overall conservation status of habitats in Co. Kilkenny	The NPWS; For all European sites:  The Status of EU protected Habitats and Species in Ireland (NPWS).	Every 6 years
	No loss of protected species	Overall conservation status of species in Co. Kilkenny, distribution of protected species in Co. Kilkenny	NPWS, The Status of EU protected Habitats and Species in Ireland. National Biodiversity Data Centre	Every 6 years
	No spread of invasive species within the Plan area	Numbers of new cases identified over 2014 levels	National Biodiversity Data Centre	Ongoing depending on available information
<b>Population and Human Health</b>	No loss of population within Plan area	Total population within settlement boundary	Census	Next Census
<b>Water</b>	No decline in river water quality; no increase in percentage of sample stations in seriously polluted rivers.	Percentage of sample stations in seriously polluted rivers.	EPA Reports on River water quality	Ongoing depending on available information
	No decline in estuarine water quality; no decline in status of estuarine waters from current status (good or moderate)	Status of estuarine waters	EPA	Ongoing depending on available information
	No decline in surface water quality; no decline in status of surface waters from current status	Status of estuarine waters	EPA	Ongoing depending on available information
	No decline in groundwater quality; no decline	Status of estuarine waters	EPA	Ongoing depending on

Environmental Category	Targets	Selected Indicators	Data Sources	Monitoring Frequency
	in status of groundwater from current status			available information
	No reduction in processing of waste water and treated effluent quality; no failure of Belview plant in EPA reports.	Pass or Fail status of Callan WWTP plant in EPA reports on Urban Waste Water Treatment.	EPA	Ongoing depending on publication of reports
	Improvement in quality of drinking water; no Scheme being included on the EPA's Remedial Action List.	Inclusion/not being included on the EPA's Remedial Action List.	EPA	Publication of EPA's Remedial Action List
	Improvement in application of groundwater protection scheme	No significant increase in number of septic tanks permitted within the Plan area	Kilkenny County Council	Periodic review
<b>Air</b>	Increase in proportion of people using sustainable transport	Proportion of people walking, cycling or using public transport to get to school or work.	Census	Next Census
	No decrease in air quality; no exceedances in Nitrogen Dioxide and Ozone.	Exceedances in Nitrogen Dioxide and Ozone.	EPA	Ongoing depending on publication of reports
<b>Cultural Heritage (architectural and archaeological)</b>	Increase, or maintenance of the number of structures listed on the RPS; no reduction of the number of protected structures over that listed in 2009 Plan.	Number of protected structures.	Kilkenny County Council	Periodic review