



Strategic Environmental Assessment Statement

Amendment No. 2 of the Mallow Local Area Plan 2011

December 2014

In accordance with Article 9 of Directive 2001/42/EC of the European Parliament and of the Council
on the assessment of the effects of certain plans and programmes on the environment
(SEA Directive)





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1 Introduction Strategic Environmental Assessment Statement

1.1 Context

- 1.1.1 This is the SEA Statement for Amendment No. 2 of Mallow Electoral Area Local Area Plan 2011, which was adopted on 08 December, 2014. Strategic Environmental Assessment (SEA) is a process for evaluating, at the earliest appropriate stage, the likely environmental effects of implementing a Plan, an amendment to a Plan or other strategic action in order to ensure that environmental considerations are appropriately addressed in the decision-making process during the preparation, and prior to adoption, of a Plan or an amendment to a Plan.
- 1.1.2 The European Directive (2001/42/EC) on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the SEA Directive) was transposed into national legislation by the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435/2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436/2004). These regulations were subsequently amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations, 2011 (S.I. No. 200 of 2011) and the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations, 2011 (S.I. No. 201 of 2011).
- 1.1.3 The legislation requires that the Plan-making authority must make available an SEA Statement summarising how the SEA and consultations have been taken into account in the making of the Plan or the amendment. This document comprises the SEA Statement.

1.2 Summary of the SEA process

Table 1-1 Summary of SEA Process	
SEA Stage	Amendment No 2 to the Mallow Electoral Area Local Area Plan.
1 – Screening	Decision on whether or not an SEA of the Plan is required. SEA is mandatory for this amendment because the population of the area the subject of the amendment is greater than 5,000 persons.
2 – Scoping	Consultation with defined statutory bodies on the scope and level of detail to be considered in the preparation of the environmental report. A scoping consultation with the Environmental Authorities was undertaken as required under Section 14C(c) of the Planning and Development Strategic Environmental Assessment Regulations 2004- 2011. A submission was received from the EPA which highlighted a comprehensive range of issues to be considered including water, waste water treatment, groundwater protection, bathing water, water conservation, strategic water services, Flood Prevention and Management, Hydrometrics, Integration of infrastructure, zoning and Development, biodiversity, EU protected species and Habitats, Appropriate Assessment, Water Framework Directive, Green infrastructure, Habitat mapping, Biodiversity Action Plans, Air Noise and Climatic Factors, Radon, Energy Conservation, Landscape Character Assessment, Geology/ Geomorphology, Human Health / Quality of life, Transportation, Tourism, Infrastructure Planning, Urban Waste Water Discharge Licensing, Waste Management, EIA, SEA and the EPA’s report on Ireland’s Environment 2012 – ‘Main



Table 1-1 Summary of SEA Process	
	<i>Environmental Challenges’.</i>
3 – Environmental Assessment and Environmental Report.	The next stage of the SEA process comprised an assessment of the likely significant impacts on the environment as a result of the proposed Amendment and the preparation of the Environmental Report. The Environmental Report went out on public display with the Proposed Amendment. Six submissions were received including submissions from the Department of Environment, Community and Local Government, Office of Public Works, Environmental Protection Agency, National Roads Authority and two private landowners. The submissions were considered and discussed in the Chief Executive’s Report to Members in November 2014. Having regard to the interim nature of the amendment it was decided to proceed with the amendment as published, without further changes.
4- SEA Statement	Preparation and publication of the SEA Statement identifying how environmental considerations and consultation have been integrated into the Final Plan. This document is the SEA Statement.

1.3 Content of the SEA Statement

- 1.3.1 The SEA Statement is described in Article 9 of the SEA Directive as a statutory requirement and should be made available with the adopted plan. This statement is required to be issued to the environmental authorities that were previously consulted, with a view to presenting a record of the key elements of the SEA process and illustrating how environmental considerations have been integrated into the plan and the key decisions taken in the plan as a consequence of the SEA.
- 1.3.2 The SEA Statement is required under Article 13I, SI No 436 of 2004 (as amended), to include information on:
- a) How environmental considerations have been integrated into the Plan;
 - b) How the Environmental Report, submissions and observations made to the planning authority on the Plan and Environmental Report, and any trans-boundary consultations (where relevant) have been taken into account during the preparation of the Plan;
 - c) The reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with; and
 - d) The measures decided upon to monitor the significant environmental effects of implementation of the Plan.



2 How Environmental Considerations were Integrated into the Amendment

2.1 Introduction

- 2.1.1 This section outlines the scope of Amendment No 2 of the Mallow Electoral Area Local Area Plan and deals with how environmental considerations and the findings of the SEA as presented in the Environmental Report were taken into account during the preparation of the Amendment.
- 2.1.2 The protection and conservation of the environment has been a key consideration throughout the preparation of the Amendment. However the scope for making changes to fundamental provisions of the amendment was constrained by the nature and purpose of the amendment, as explained below.

2.2 Scope of the Amendment

- 2.2.1 The existing Mallow Electoral Area Local Area Plan 2011 sets out the Council's planning policy and objectives for development within the Mallow Electoral Area but does not include the settlement of Mallow as it was dealt with separately under the 2007 Mallow Special Local Area Plan (SLAP)(environs of Town only) and the Mallow Town Development Plan 2010. The Mallow SLAP expires in 2015. The amendment is intended as an interim measure to bridge the gap between the expiry of the Mallow Special Local Area Plan in 2015 and the adoption of a new Local Area Plan for the Mallow -Kanturk Municipal District in 2017.
- 2.2.2 The amendment seeks to incorporate the key provisions of the SLAP into the existing Local Area Plan. In this context the amendment does not make substantive changes to the planning regime inherited from the Mallow SLAP and regard must therefore be had to the fact that it was adopted in 2007. When the new Municipal District Local Area Plan is prepared, the planning framework for the town in its entirety will be reconsidered and updated in light of current planning and environmental policy, legislation and guidance.
- 2.2.3 The Amendment acknowledges that the Habitats Directive Process has highlighted issues in relation to the sensitivity of the River Blackwater Catchment and the conflict that exists between achieving the growth targets assigned to Mallow under its "hub" status and the difficulty in achieving the water quality standards which are required to restore the favourable conservation condition of the Freshwater Pearl Mussel in that portion of the river downstream of Mallow. Further studies and investigations are required in order to resolve this issue. The amendment provides that, pending the outcome of these additional studies, the implementation of the population targets for Mallow and the wider catchment needs to be put on hold. Unless these conflicts can be resolved, the development/ infrastructure strategy for the Blackwater, including Mallow, may need to be reviewed.
- 2.2.4 In addition to the issues in the Blackwater Catchment, the amendment acknowledges that a number of other issues need to be addressed before development of any significance, including that provided for in the amendment, can take place including:
 - a) A Sustainable Urban Drainage Plan for Mallow needs to be prepared to provide a framework for the management of surface water within the town in order to protect water quality within the Blackwater.
 - b) Masterplans must be completed and approved for the development of the three main master plan sites including the X-03 and X-06 sites which combined provide for 4,000 houses, schools, employment and other uses, and the former sugar factory site, X-07.
 - c) An updated Traffic and Transportation strategy needs to be prepared to inform the development of zoned lands and the preparation of the Master plans.



- d) Significant investment in water services, roads and transportation infrastructure is required in order to facilitate development.

2.2.5 The Environmental Report highlights a number of issues that need to be addressed in other to avoid, reduce or mitigate potential adverse impacts of the proposed amendment on biodiversity, soil, landscape, population etc. However, in the context of there being a number of outstanding studies which are required to inform the future development strategy of the town, and the fact that the amendment deals with only part of the town, it was decided that it would be premature to amend the development strategy for the environs of the town at this stage or to try and mitigate the potential effects of the amendment, given that the amendment represents an interim position and the population target is 'on hold'. Resolution of issues in relation to the Blackwater Catchment will clarify the scale of growth that can be accommodated in Mallow in the future and the land supply needed to accommodate that growth. This may be different to the scale of development provided for by the amendment. Resolution of this issue will also form the basis for the updated Traffic and Transport Strategy, the Sustainable Urban Drainage Strategy, the preparation of the master plans and the water services investment programme required to facilitate future development of the town etc.

2.3 Integration of Environmental Considerations

- 2.3.1 Notwithstanding the limited scope of the amendment process, environmental considerations were integrated into the amendment in a number of ways through:
 - a) Preparation of the Environmental Report including baseline data collection and evaluation of potential impacts.
 - b) Consultation
 - c) Mitigation measures
 - d) Compliance with the Habitats Directive – Appropriate Assessment.

2.4 Environmental Report and Baseline Data Collection

- 2.4.1 In order to assess the likely significant impacts of the Amendment, baseline data on the current state of the environment was collected and evaluated. This has been done with reference to existing databases held by the Council and other organisations such as the EPA, National Parks and Wildlife Service (NPWS), South West River Basin District (SWRBD), Geological Survey of Ireland (GSI) etc. GIS mapping has been used where possible in the Environmental Report to illustrate the data. In accordance with legislation and guidance, the existing environment was described with respect to biodiversity, population, human health, fauna, flora, soil, water (surface freshwater, coastal, transitional, groundwater, bathing and water services (drinking water and waste water treatment), air, climatic factors, material assets (roads, transportation, energy etc), cultural heritage (including architectural and archaeological heritage), landscape and the interrelationships between these factors as appropriate. Collection and analysis of this information has allowed the identification of key resources and sensitivities within the area covered by the amendment and allowed for the identification of potential threats to the environment.
- 2.4.2 As the data was compiled and amendment policies evolved, the likely significant effects of implementing the amendment were identified, described and evaluated. This process formed a core element of the Environmental Report. The potential effects of the amendment were then considered using a system of Environmental Protection Objectives, Targets and Indicators which were formulated having regard to the issues emerging from the baseline assessment, consultations with the environmental authorities and internal consultation with other departments within the Council. The assessment of the baseline



environment also enabled those preparing the amendment to consider how the environment might evolve in the absence of the proposed amendment.

- 2.4.3 Following the assessment, the Environmental Report identified a number of issues of concern which are outlined in Table 2-1 below and are discussed in Chapter 6 of the Environmental Report.
- 2.4.4 Six submissions were received following the public consultation on the Amendment. These submissions and the recommendation of the Chief Executive were outlined in a Report to Members in November 2014. Having regard to the interim nature of the amendment as discussed in Section 2.2 above it was decided to proceed with the amendment as published, without further changes. The issues arising in the submissions were already acknowledged in the amendment and will be dealt with as part of the preparation of the new LAP. Submissions are discussed further in Section 3 of this document.

Table 2-1 Concerns emerging from the SEA Process		
Issue		Action Taken
1	What is Mallow’s role in terms of the sustainable development of Cork. Should it function as a self sufficient town or as a dormitory town for Cork city. How can sustainable growth be delivered?	Objective DB-05 seeks to provide a balance between the provision of housing and employment growth.
2	Need for a Stormwater and Wastewater Management Plan for the Upper Catchment of the River Blackwater to inform how development options can proceed within the Environs.	Council has committed, as one of the stakeholders, to the preparation of this plan.
3	A Sustainable Urban Drainage Systems Plan for the entire town is needed to manage surface water and protect water quality. The recommendations of this SUDS Plan need to be finalised and implemented as a prerequisite to permitting further development within the Environs.	Requirement for a SUDS plan has been included in the amendment.
4	An updated Traffic & Transportation Strategy is required identifying the critical new movement infrastructure necessary to release new housing and employment land, traffic management mechanisms to address congestion in the town centre and setting out proposals to deliver increased modal shift to walking and cycling for short trips.	Requirement for an updated traffic strategy has been included in the amendment.
5	Proposals needed for the protection of local biodiversity outside designated sites.	Recommendation included.
6	Need to minimise soil impacts. Consider	This issue has been deferred to the



Table 2-1 Concerns emerging from the SEA Process	
Issue	Action Taken
	preparation of a soil management plan given the significant amount of greenfield land targeted for development.
7	Additional text required requesting urban design framework to accompany development of employment land within the town.
8	Additional text needed to ensure any residual contamination issues are resolved prior to redevelopment of lands zoned X-07 (former Sugar Factory site).
9	Some areas zoned for development contain areas where there are high concentrations of archaeological monuments, with large zones of archaeological potential, creating conflicts between development objectives and protection of archaeological heritage. The development objectives for such land needs to reviewed to give more balance to the protection of archaeological heritage.

2.5 Statutory Consultation

- 2.5.1 As part of the preparation of this amendment consultation was first undertaken with the Environmental Authorities (EPA, DECLG, DAHG) in relation to the Scoping of the Environmental Report as part of the SEA process. One submission from the EPA was received in response to this consultation.
- 2.5.2 The second phase of consultation was undertaken with public and statutory bodies in relation to the Amendment, Environmental Report and Habitats Directive Screening Report. This took place over a six week period from 26 September – 07 November 2014. Six submissions were received in response to this consultation. (See Section 3 for further details on the content of these submissions).
- 2.5.3 At all stages of consultation, the content of the submissions received have been considered by the Plan, SEA and AA teams and the Members, where considered appropriate. Further detail on the submissions is provided in Section 3.

2.6 Proposed Mitigation

- 2.6.1 As outlined in section 2.2, this amendment process is being undertaken to provide for the continuation of the planning framework of the environs of Mallow town, pending the completion of a new Local Area Plan in 2017. In this context, other than where required in response to the Habitat Directive Assessment process, this amendment does not make



substantive changes to the planning regime inherited from the Mallow SLAP and regard must therefore be had to the fact that it was adopted in 2007. While it is acknowledged that aspects of the strategy may be out of date, the updating is being deferred to the preparation of the new LAP which will deal with the town and environs as one entity.

- 2.6.2 In response to the HDA process , land zoned for development within the River Blackwater Special area of Conservation and lands identified as being “at risk” of flooding within the Natura 2000 designation were rezoned as “open space” to avoid impacts on the protected habitats and species within the River.
- 2.6.1 Other mitigation measures included in the amendment include the putting on hold of the population target of the town pending the resolution of outstanding issues in relation to the capacity within the Blackwater Catchment and the preparation of a SUDs Plan for the town etc.

2.7 Compliance with EU Habitats Directive – Appropriate Assessment

- 2.7.1 A further aspect of the assessment of the Plan was the undertaking of an Appropriate Assessment under the EU Habitats Directive (92/43/EEC). This parallel process ensured that environmental considerations, specifically focused on Natura 2000 sites, were integrated into the Amendment to the Plan as it was developed.
- 2.7.2 Under the EU Habitats Directive, any plan or project not directly connected with or necessary to the management of a Natura 2000 site, e.g. Special Area of Conservation (SAC) or Special Protection Area (SPA), but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site’s conservation objectives. The River Blackwater Special Area of Conservation traverses the environs and water quality within the river could be impacted by the new development proposed as part of this Amendment. Therefore, the AA process was applied to the Amendment process to determine if it would have significant effects on this European designated site.
- 2.7.3 The Habitats Directive Assessment Screening Report prepared as part of the Amendment process highlighted a number of issues which are detailed in Table 2-2 below. During the preparation of the amendment, the strategy was modified accordingly to take these issues into account, as detailed in the Table. The Assessment concluded that there was uncertainty in relation to the capacity of the River Blackwater catchment to facilitate the levels of growth envisaged and recommended further assessment be undertaken. Under the provisions of the amendment the population target for Mallow Environs has accordingly been put “on hold” pending the outcome of further assessments. The final stage of the Habitats Directive Assessment of the Amendment is documented in the Natura Impact Report, published with the Adopted Amendment.

Table 2-2 Habitats Directive Assessment Screening Stage - issues arising		
	Issue	How reflected in Amendment.
1	A SUDs plan for Mallow is needed to demonstrate how development can be accommodated without impacting on water quality in the SAC.	Objective to prepare a SUDS plan has been included in the amendment – Development Boundary Objective DB-01. Development is “on hold” pending the completion of SUDS



Table 2-2 Habitats Directive Assessment Screening Stage - issues arising		
	Issue	How reflected in Amendment.
		Plan.
2	There is no certainty that the Mallow population targets can be accommodated without having adverse effects on the integrity of the Blackwater River SAC. Need for SUDs may affect the area of land available for development and the quantum of development which can be accommodated.	This is reflected in the Adopted Amendment - Sections 1.3.8, 1.3.9, 1.5.4, 1.5.5, 2.3.1, 2.6.10, 2.8.2 and objectives DB-01 and DB-02.
3	Amendment needs to acknowledge that objectives, zonings, targets etc may need to be altered following completion of further studies on the Blackwater and the completion of the SUDs plan.	This is acknowledged. See Adopted Amendment Sections 1.3.8, 1.3.9, 1.3.13 to 1.3.20, 2.3.1., 2.6.10., 2.8.2, 2.6.10 and objectives DB-01 and DB-02.
4	Boundaries of sites X-03, X-07 & I-06 should be amended where it overlaps with the SAC or is within the floodplain adjacent to the SAC and poses a residual risk of impacts on water quality.	Boundaries and objectives have been modified.
5	Boundaries of land zoned for development within an identified flood risk zone should be altered to ensure there is no pressure within the flood plain of the SAC, even if it is outside the SAC.	Some lands within the floodplain outside the SAC have been retained and text is included to address flooding issues at the project stage.
6	Development boundary objectives should provide for the retention and the enhancement of features of biodiversity value including wetlands, woodlands, mature trees, hedgerows and other field boundaries within and along their boundaries.	See objective DB-09.
7	Areas zoned open space which overlap with the SAC designation should include text to flag this issue. It should be clear that open space areas within SAC are not suitable for development and that watercourses, riparian habitat and woodland habitat will be retained and protected where appropriate.	Text has been included as appropriate in each Open space objective. Only 0-01 makes provision for some housing development.
8	Need to ensure protection and retention of watercourses, floodplains and riparian habitats on X-01	Done. See wording of Objective X-01.



Table 2-2 Habitats Directive Assessment Screening Stage - issues arising		
	Issue	How reflected in Amendment.
9	Need for masterplans to be informed by an ecological assessment which would identify key ecological resources which should be retained and integrated into future development.	Done. See wording of objectives X-03, X-06 and X-07.
10	Relevant objectives should state that watercourses, woodland and riparian habitats are to be retained and protected. It would be desirable to provide for protection of field boundaries, hedgerows and other features of biodiversity value where possible.	See wording of objectives R-05, R-08, E-01, I-01, I-03, I-04, I-05, I-06 and B-01.
11	Potential for contaminants on land zoned X-07 should be addressed.	Text has been included to deal with this at the project stage.
12	Roads proposals advocated by SLAP have not been fully assessed. U-02 connecting Park Road and the N72traversese the SAC.	Objective U-02 from the SLAP has been omitted. Access issues will need to be addressed in a revised Traffic and Transportation study. The wording of the objectives for the Northern Relief Road and M20 has been revised to protect the route corridor only.



3 Submissions and Observations

3.1 Introduction

3.1.1 This section deals with how submissions and observations from prescribed bodies and members of the public, received throughout the process of preparing the amendment and relevant to the SEA process, were taken into account in the preparation of the final document.

3.2 SEA Scoping Stage

3.2.1 A scoping consultation with the Environmental Authorities was undertaken as required under Section 14C(c) of the Planning and Development Strategic Environmental Assessment Regulations 2004- 2011.

3.2.2 A submission was received from the EPA which highlighted a comprehensive range of issues to be considered in the preparation of the SEA and proposed Amendment including water, waste water treatment, groundwater protection, bathing water, water conservation, strategic water services, Flood Prevention and Management, Hydrometrics, Integration of infrastructure, zoning and Development, biodiversity, EU protected species and Habitats, Appropriate Assessment, Water Framework Directive, Green infrastructure, Habitat mapping, Biodiversity Action Plans, Air Noise and Climatic Factors, Radon, Energy Conservation, Landscape Character Assessment, Geology/ Geomorphology, Human Health / Quality of life, Transportation, Tourism, Infrastructure Planning, Urban Waste Water Discharge Licensing, Waste Management, EIA, SEA and the EPA’s report on Ireland’s Environment 2012 – ‘Main Environmental Challenges’. These issues were considered where possible, within the scope of the amendment process.

3.3 Proposed Amendment and Environmental Report Consultation

3.3.1 The Environmental Report was prepared to document the assessment of the environmental effects of implementing the Amendment to the Local Area Plan. It made a number of recommendations for changes as detailed in Table 2-1 of this report. The full assessment and background to the recommendations is discussed in Chapter 6 of the Environmental Report.

3.3.2 The proposed Amendment to the Mallow Local Area Plan was published on the 26th September 2014 together with the Environmental Report and Habitats Directive Screening Report. A total of 6 submissions were received from the public and statutory agencies. These are summaries in Table 3-1 below, together with the Response of the Chief Executive.

Table 3-1 Details of submissions on the Amendment		
Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
1	<p>Department of Environment, Community and Local Government:</p> <p>While acknowledging the need to provide for the continuation of the planning policy provisions for the environs of Mallow post the expiry of the Mallow SLAP, it is considered that the proposed amendment raises a number of issues.</p>	<p>All of the issues raised in the Minister’s submission have already been highlighted in the published amendment documentation, including the Environmental Report and Habitats Directive Screening Report. The Council agrees in</p>



Table 3-1 Details of submissions on the Amendment

Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
	<p>Many aspects of the 2007 Plan do not comply with higher level plans or national planning guidelines which have been published in the interim.</p> <p>In addition the Department acknowledges that there are unresolved issues in relation to achieving the population targets for Mallow in a manner compatible with the full protection of the Blackwater River SAC and supported with Irish Water Investment.</p> <p>The Department agrees in principle to the proposed amendment subject to the Planning Authority addressing the following below, including :</p> <ul style="list-style-type: none"> • Further policy safeguards to <u>ensure compliance</u> with the SEA / Habitats Directives, and • Changes to <u>ensure consistency with CDP, RPG and national policy</u> as set out in S28 Guidelines. <p>(1) SEA: The amendment does <u>not adequately provide</u> for the mitigation of impacts identified in the Environmental Report in relation to :</p> <ul style="list-style-type: none"> ➢ Biodiversity (need for a biodiversity database for Mallow); ➢ Soil (need for a Soil Management Strategy) and, ➢ Employment land - need for a master plan approach/ urban design framework to guide the development of zoned employment land. <ul style="list-style-type: none"> • The Council is requested to set out specific mitigation measures to address these conflicts. <p>(2) AA: it is noted that objectives DB-01 and DB-03 provide that development may only proceed where appropriate infrastructure is in place to ensure compliance with environmental legislation and a SUDS plan has been prepared. Provisions of the amendment</p>	<p>principle with the need to address the issues outlined and has already flagged these issues as ones which need to addressed as part of the preparation of a new plan for Mallow when the strategy for the town and environs can be considered as a whole.</p> <p>In relation to the SEA and Habitats Directives, the amendment already includes very strong mitigation in terms of minimising potential negative impacts of development. The amendment includes the ultimate phasing and mitigation mechanisms, by providing that the population target of the town is on hold pending the resolution of outstanding issues in relation to Appropriate Assessment. The development boundary objectives reference all the significant issues that development proposals need to address.</p> <p>Issues in relation to the over supply of residential land will be reassessed as part of the preparation of the new Plan. It would be premature to start readjusting the supply of land until clarity is available in relation to the Blackwater Catchment. The amendment is not inconsistent with the County Development Plan as it stands. Once the new County Development Plan is adopted there will be an inconsistency in terms of land supply but Section 19(2B) of the 2000 Act provides for this and gives the planning authority one year following to</p>



Table 3-1 Details of submissions on the Amendment		
Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
	<p>serve to prevent the Planning Authority from approving any significant new development until further studies are completed. Given Regional status of Mallow submission notes that these issues need to be addressed as a matter of urgency.</p> <p>(3) Population and housing: amendment needs modification to <u>ensure consistency with higher level plans</u>. The land supply provided in the amendment exceeds the growth targets for Mallow to 2022 and does not reflect the Core Strategy of the Draft CDP and is therefore <u>contrary to Section 19(2)</u> of the 2010 Act.</p> <ul style="list-style-type: none"> ➤ Amendment should be revised to show amend Table 2-1 to show extra columns for 'Net Housing Land required (Ha) to 2022' and a 'Strategic Reserve Housing Lands'. ➤ Further clarification is also sought on Vacancy, development completed since 2011, extant permissions, unfinished estates etc, ➤ Clarification needed on approach to deal with surpluses of land zoned in the Town / Environs; ➤ Clarification needed on density ranges proposed to 2022, ➤ Clarification needed on the relationship to any lands zoned for housing under the current Mallow EA LAP 2011. <p>(4) Phasing: Given limitation on development under the amendment, the amendment should</p> <ol style="list-style-type: none"> a) be unequivocal on what development, if any, can be permitted under this amendment; b) what development <u>will not</u> receive planning permission during the life of the Plan. 	<p>amend the local area plan. The Council has already committed to commencing the review the LAP next year.</p> <p>The objectives of the plan will determine what development can proceed.</p> <p>With regard to a timetable for the studies, the Council is actively seeking to resolve the issues in relation to the Blackwater Catchment. Once clarity is available on that issue it will inform the rest of the studies. In relation to phasing, it would be premature and a waste of resources to adjust the current amendment to introduce phasing when the overall land supply needs to be reconsidered as outlined above.</p> <p>The objectives of the amendment already commit the Council to undertaking the additional studies, which are needed to inform the new LAP.</p> <p>With respect to flood risk assessment, the Council followed the approach taken with the Local Area Plans adopted in the 2011, an approach which was developed at the time in conjunction with the OPW and which was regarded as being a Stage Two Assessment. While it is acknowledged that the FRA does not specifically mention the OPW mapping prepared for the flood relief scheme this information is reflected in the more recent PFRA mapping which is referenced and illustrated. Flood risk assessment in Mallow</p>



Table 3-1 Details of submissions on the Amendment

Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
	<p>c) Include a clear and realistic timetable for the completion of all studies, reports and investigations re the capacity of the catchment town to accommodate development;</p> <p>d) A provisional phasing programme for 2015-2022 showing a sequential approach to development and lands identified as a strategic housing / employment reserve.</p> <p>(5) Further Studies: The following studies should be identified for <i>completion</i> as part of the amendment and the findings of same should be incorporated into the new Municipal District LAP in 2017:</p> <p>a) A Green Infrastructure Strategy for the town.</p> <p>b) A Master Plan for zoned employment lands to the south of the Environs.</p> <p>c) Any updated Traffic and Transportation study prepared shall have regard to the provisions of the Government’s ‘Smarter Travel – A Sustainable Transport Future, 2009.</p> <p>(6) Flooding: Notes OPW view that the Stage 2 FRA submitted with the amendment does not incorporate all available sources of flood risk information and is not of the required standard. Department tend to the view that the zoning proposals on lands at risk of flooding are <i>contrary to the 2009 Flood Guidelines</i>. A revised stage 2 FRA should be carried out or lands at risk of flooding should be omitted from the amendment.</p> <ul style="list-style-type: none"> • <p>(7) Roadside Services : Special Zoning Objective X-08 is contrary to the Department’s Spatial Planning and National Roads Guidelines (2012) and should be omitted from the Plan.</p>	<p>is also more complicated due to the flood defences which provide protection to some areas of the town from the 1/100 year event. Assessment at the site level allows for the detailed consideration of all these issues using the best information available at the time. The CFRAM Study for the Blackwater Catchment (Unit of Management No. 18) is ongoing. Draft CFRAM Flood maps for Mallow are not yet publically available but are due to be published in 2015 and can inform the new plan.</p> <p>With respect to objective X-08, the amendment acknowledges that zoning Objective X-08 for roadside services will be revised as part of the preparation of the new plan. The amendment provides that in the interim any proposals to develop the site will need to demonstrate compliance with national guidelines.</p> <p>Chief Executive’s Response: It is noted that the Minister agrees with the principle of the proposed amendments. However, while acknowledging the need to address the issues raised in the submission as part of the review of the development strategy for Mallow, it would be premature to seek to tackle such issues now as this amendment only deals with part of the town and a sustainable strategy cannot be devised until such time as the issues in relation to the Blackwater Catchment are resolved. Preparation of the New LAP for Mallow will begin in 2015. No change to the amendment is proposed.</p>



Table 3-1 Details of submissions on the Amendment		
Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
2	<p>Office of Public Works</p> <p>The submission details the three stages of Flood Risk Assessment process provided for in the Guidelines. In relation to the detail of the amendment the submission indicates the following:</p> <ul style="list-style-type: none"> a) Clarification in required as to whether Figure E is the updated zoning map. b) The FRA for the amendment should be updated to consider the PFRA pluvial and groundwater flood risk maps. c) The FRA uses the JBA flood risk mapping but does not include a number of tributaries and the maps have not been validated by local knowledge; this should be addressed. d) In response to development objectives requiring site specific assessment at the project stage the submission recommends a complete illustration of the Planning Principles of the Guidelines – sequential approach, justification test etc. to each site being zoned at this stage of the process to demonstrate how it complies with the Guidelines. <p>Overall the OPW submission indicates that the Flood Risk Assessment carried out for the amendment is not to a Stage 2 standard and does not fully adhere to the requirements of the Guidelines. Amendment requires a full stage 2 assessment</p>	<p>With respect to flood risk assessment, the Council followed the approach taken with the Local Area Plans adopted in the 2011, an approach which was developed at the time in conjunction with the OPW and which was regarded as being a Stage Two Assessment. While it is acknowledged that the FRA does not specifically mention the OPW mapping prepared for the flood relief scheme this information is reflected in the more recent PFRA mapping which is referenced and illustrated. Flood risk assessment in Mallow is also more complicated due to the flood defences which provide protection to some areas of the town from the 1/100 year event. Assessment at the site level allows for the detailed consideration of all these issues using the best information available at the time. The CFRAM Study for the Blackwater Catchment (Unit of Management No. 18) is ongoing. Draft CFRAM Flood maps for Mallow are not yet publically available but are due to be published in 2015 and can inform the new plan.</p> <p>Chief Executive’s Response: The contents of the submission are noted. No change is proposed.</p>
3	<p>Environmental Protection Agency</p> <p>Submission welcomes the inclusion of stronger objectives addressing issues such as the protection of water quality, flood risk management, appropriate critical service infrastructure provisions and the protection of natural heritage. However submission indicates that a stronger commitment should be considered in relation to other aspects of</p>	<p>See response above to submission from the DECLG.</p> <p>In practice the amendment already includes very strong mitigation in terms of minimising potential negative impacts of development. The amendment includes the ultimate phasing and</p>



Table 3-1 Details of submissions on the Amendment

Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
	<p>the amendment such as land use zoning and phasing, alternative scenarios, cumulative and in combination effects, monitoring and mitigation.</p> <p>The Amendment:</p> <ol style="list-style-type: none"> 1 In particular the submission recommends that the oversupply of zoned land should be re-examined as a part of the amendment and an interim phased approach should be considered, reflecting Core Strategy population targets and development which can realistically be accommodated while not compromising obligations under the Water Framework/ Flooding / Habitats Directives etc. Phasing should reflect the lands considered suitable for development during the remaining duration of the LAP. 2 Cumulative and in combination effects on water quality and the SAC should be fully assessed and appropriate mitigation provided as necessary 3 Flood zones should be reflected in Figure 2-1 (They already are) 4 The time scale of the development of further studies and plans should be clarified. 5 A Commitment to protecting and enhancing ecological corridors in areas of proposed development should be considered and a time scale for the completion of habitat mapping should be considered. 6 DB-01 should be amended to read ..."... development proposals, will require screening for Appropriate Assessment....". 7 Master plans should be subject to SEA, AA and FRA and master plan objectives should reflect this. <p>The Environmental Report:</p> <ol style="list-style-type: none"> 8 Scope of objective text in paragraph 2.2.6 with respect to DB-09 should be amended to ..."requires development to protect and where possible enhance the biodiversity of the area".. 9 Decision not to consider alternative scenarios is noted. However in the context 	<p>mitigation mechanisms, by providing that the population target of the town is on hold pending the resolution of outstanding issues in relation to Appropriate Assessment, the preparation of a SUDs Plan for the town etc.</p> <p>The development boundary objectives reference all the significant issues that development proposals need to address to allow for a full consideration of issue at the project stage.</p> <p>As outlined above it is considered that further changes to the provisions of the amendment would be premature and wasteful of resources at this stage.</p> <p>The issues raised in the submission will however greatly assist in the preparation of the new Municipal District LAP and will be considered as part of that process.</p> <p>Chief Executive's Response: The contents of the submission are noted. No change is proposed.</p>



Table 3-1 Details of submissions on the Amendment		
Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
	<p>of the recommended review of zonings and phasing discussed above, consideration should be given to re-evaluating this decision. Alternative phasing options should be assessed.</p> <p>10 In terms of planned infrastructural improvements requirements of various Directives should be taken into account. Potential for cumulative and in combination effects of implementation of DB-01, DB-02, DB-03, DB-04 and DB-09 should be taken into account. Any effects should be mitigated and commitments included where relevant in the amendment.</p> <p>11 In terms of monitoring, consideration should be given to the inclusion of monitoring frequencies, monitoring of positive and negative effects and inclusion of an ongoing review of the environmental targets and indicators themselves. Responsibility for this role should be defined.</p> <p>12 The monitoring programme must be flexible and able to deal with cumulative effects. Departments responsible for collecting, collating and analysing the data should be identified. Monitoring programme should include information on how unforeseen adverse impacts will be identified and the relevant procedures to trigger a response and the associated responsibilities.</p> <p>13 In the Non Technical Summary, the evolution of the baseline environment in the absence of the amendment should be considered.</p>	
4	<p>National Roads Authority</p> <p>The Authority notes the short term interim nature of the amendment pending the preparation of a new LAP for the area. Submission also notes the provisions of Zoning objective X-08 and the content of Section 2.4.8 which indicates that <i>“while the zoning has been retained as a part of this amendment (although reclassified as a Special Policy Area),</i></p>	<p>The amendment documents already make clear that the planning strategy for Mallow will be comprehensively reviewed as part of the preparation of the new LAP. Section 2.8.31 already indicates that development on the X-08 site will need to be compatible with the</p>



Table 3-1 Details of submissions on the Amendment

Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
	<p><i>the zoning will be reviewed as a part of the preparation of a new LAP. In the interim any proposals to develop the site would need to be compatible with the requirements of National Policy on the protection of National Routes".</i></p> <p>The NRA request that this statement from section 2.4.8 should be reiterated in section 2.8.31 (zoning objective) in the interests of clarity.</p>	<p>requirements of National Policy on the protection of National Routes.</p> <p>Response: No further changes are considered necessary.</p>
05	<p>Denis Murphy - Beneficial owners of lands zoned 0-01:</p> <p>This submission relates to the lands zoned 0-01 (open space: lands to remain predominantly open and rural in character with limited potential for individual dwellings at very low density etc.). The submission seeks the rezoning of the land for residential use and outlines the advantages of the site for such uses - close proximity to schools and services, town centre etc.</p>	<p>There is already an oversupply of residential land. It would be premature to consider the rezoning of this land in isolation from the consideration the zoning issues for the town as a whole. Zonings will be reconsidered as part of the preparation of the Municipal District LAP.</p> <p>Response: Noted. No changes proposed.</p>
06	<p>Coakley O' Neill on behalf of Dairygold:</p> <ol style="list-style-type: none"> 1. Submission seeks to confirm Dairygold's commitment to the development of the Hub town in accordance with the LAP. Submission indicates Dairygold has no issues with the provisions of the proposed amendment as it relates to their lands at Parkdallane/ Ballyvinitier (within the area zoned X-03) and at Quartertown (part of B-01) 2. Dairygold also owns land at Ballyvorisheen, east of the proposed M20 and considers there may be merit in considering an extension of the development boundary to include these lands in the future. 3. Dairygold would welcome the opportunity to engage with the Council on how best to develop the SUDS plan referenced at DB-02. 4. Dairygold would welcome early and active engagement in relation to the 	<p>Response: Noted. No changes necessary.</p>



Table 3-1 Details of submissions on the Amendment		
Submitter	Aspects of submission relevant to SEA	Response of Chief Executive
	preparation of the new Municipal District LAP in 2015.	

- 3.3.3 All the submissions received were summarised and responded to in the Chief Executive’s Report to Members in November 2014.
- 3.3.4 Having considered the Amendment, Environmental Report, Habitats Directive Screening Report and the submissions received, and having regard to the interim nature of the amendment which deals only with the environs of the town, the controls and mitigations that are already included in the amendment and the fact that the Council will commence the preparation of a new LAP in 2015, the Chief Executive recommended that it was reasonable and appropriate to proceed with the amendment in order to provide for the continuation of the planning framework for the environs of the town post the expiry of the Mallow SLAP.
- 3.3.5 Following the consideration by Members of Amendment, Environmental Report, Habitats Directive Screening Report, and the Chief Executive’s report, the Amendment was adopted in December 2014.



4 Reasons for choosing the Amendment as Adopted

4.1 Introduction

- 4.1.1 This section of the Environmental Statement describes the reasons for adopting the Amendment.
- 4.1.2 As outlined in Section 2.2, this Amendment was triggered by the necessity to provide for the continuation of the planning framework for the Environs of Mallow post the expiry of the Mallow SLAP. In this context the Chief Executive was satisfied that, having regard to the interim nature of the amendment which deals with the only with the Environs of Mallow town, the controls and mitigations that are included in the amendment and the fact the Council will commence the preparation of a new Local Area Plan in 2015, it is considered reasonable and appropriate to proceed with the amendment in order to provide for a continuation of the planning framework for the environs of Mallow post the expiry of the Mallow Special Local Area Plan.
- 4.1.3 Outstanding issues highlighted in the Environmental Report will inform the preparation of the Mallow/Kanturk Municipal District Local Area Plan in 2015.



5 Monitoring

5.1 Introduction

- 5.1.1 The SEA Directive requires that the significant environmental effects of the implementation of plans are monitored. The purpose of monitoring is to assess the effects of the Amendment which have been predicted during the SEA process as well as identifying some effects which may not have been envisaged during the implementation stage.
- 5.1.2 Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action. In addition to this, monitoring can also play an important role in assessing whether the LAP is achieving its environmental objectives and targets measures which the LAP can help work towards, whether these need to be re-examined and whether the proposed mitigation measures are being implemented.
- 5.1.3 The Mallow Local Area Plan also includes a list of key indicators for monitoring the implementation of the Plan Amendment and indicates that some or all of these indicators will be used subject to adequate resources being available. The indicators used relate primarily to issues within the remit of the Planning Department.
- 5.1.4 Table 5.1 identifies details the environmental protection objectives, targets and indicators included in the Environmental Report, and the list of indicators to be monitored. Some of the indicators will be monitored by other Council departments e.g. water quality issues are monitored by the environmental department. In other cases the information can be extracted from the Odyssey Planning Application Management System or the Planning Register e.g. development in areas of flood risk or high landscape value.
- 5.1.5 Sources of data from other organisations (NRA, NTA, IW, ESRI, Forfas, NESC and CSO etc) which is readily available will also be used where appropriate to assess progress in implementing the Amendment to the plan.

5.2 Responsibility for Monitoring

- 5.2.1 Monitoring and implementing the Local Area Plan is primarily the responsibility of the Planning Directorate of Council, mainly through the development management function. However, the Mallow Local Area Plan also co-ordinates the work and objectives of other key departments within the local authority, such as Economic Development, Roads, Environment, Housing and Community Development. In some cases, the body responsible for the implementation of certain plan objectives may be external, such as the National Roads Authority, the National Transport Authority or Irish Water etc.



Table 5-1 Provision for the Monitoring of Significant Environmental Effects

Environmental Report Recommendations			
Environmental Protection Objective	Targets	Indicators	Data source
<p>Population</p> <p>EPO 1: To ensure the sustainable development of Mallow Environs so the people of Mallow have the opportunity to live in communities with high quality residential, working and recreation environments with sustainable travel patterns and locally-based employment opportunities.</p>	<ul style="list-style-type: none"> • Increase population growth in Mallow Environs in line with its “hub” status; • Increase employment within the town by broadening the employment base and making the town a sub-regional employment hub; • Ensure new development located where people can access a choice of transport modes to connect to the main centres of employment in the Environs and the town centre; • Decrease in journey time and distance travelled to work during the lifetime of the LAP; • All large scale housing development to be accompanied by a Design Statement. 	<ul style="list-style-type: none"> • Significant increase in the population of Mallow Environs. • Distance and mode of transport to work/ school. • No. of new houses/ employment development built within 400m of a bus route and connected walking/ cycling route. 	<ul style="list-style-type: none"> • CSO (Census Data) • CSO (POWSCAR). • Planning Register
<p>Human Health</p> <p>EPO 2: To protect and enhance human health and manage hazards or nuisances arising from traffic & incompatible land uses.</p>	<ul style="list-style-type: none"> • Avoid incompatible development nears SEVESO sites or IPPC licensed sites within the Environs of the town; • Ensure new development is well served with community facilities and facilitates including walking and cycling routes. 	<ul style="list-style-type: none"> • No of planning permissions granted within the consultation distance of Seveso sites/IPPC facilities. • No of new primary health care/schools/crèche/ community facilities provided. • Amount of (Km) new cycleways provided. 	<ul style="list-style-type: none"> • Planning register. • Planning register. • Other departments within the Council
<p>Biodiversity, Flora and Fauna</p> <p>EPO 3: Conserve and restore ecosystems, habitats and species in their natural surroundings within Mallow Environs, and ensure their sustainable management, including the ecological</p>	<ul style="list-style-type: none"> • Restore the River Blackwater to favourable conservation status including all habitats and species, especially those protected under national and international legislation. • Complete Habitat mapping for Mallow. • Implement the actions of the Cork County Biodiversity Action Plan, where relevant; • Prepare a Green Infrastructure 	<ul style="list-style-type: none"> • Number of developments receiving planning permission within designated sites or within the consultation distance of designated sites where the HDA process identified potential for impacts. • Water quality within the River Blackwater; • Number of actions achieved in Biodiversity 	<ul style="list-style-type: none"> • Planning register. • Environment Dept, Cork County Council • Heritage Officer • Will become apparent with passage of time



Table 5-1 Provision for the Monitoring of Significant Environmental Effects

Environmental Report Recommendations			
Environmental Protection Objective	Targets	Indicators	Data source
corridors between them.	<ul style="list-style-type: none"> Strategy for the town; Protect habitats from invasive species 	<ul style="list-style-type: none"> Action Plan Progress on Green Infrastructure strategy for the town. 	
<p>Soil</p> <p>EPO 4: Protect the function and quality of the soil resource in Mallow Environs.</p>	<ul style="list-style-type: none"> Reduce the use of greenfield land by encouraging the reuse of brownfield sites. Re-use of soil extracted locally; Address soil contamination issues. 	<ul style="list-style-type: none"> No of brownfield sites that have been redeveloped. Volume of construction and demolition waste recycled. Reduction in number of vacant and derelict buildings. 	<ul style="list-style-type: none"> Planning register. EPA Environment Section Cork County Council
<p>Water (W)</p> <p>EPO 5: Maintain and improve the quality of water resources and improve the management and sustainable use of these resources to comply with the requirements of the WFD.</p>	<ul style="list-style-type: none"> To restore 'good' status in the River Blackwater Catchment; Achieve compliance with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC (protection of groundwater); Not to permit development where it would result in a WWTP exceeding the terms of its discharge license; Complete and implement a SUDS strategy for the town; Appropriate management of zones vulnerable to flooding; Implementation of water conservation measures. 	<ul style="list-style-type: none"> Trends in classification of overall status of surface water under Surface Water Regulations 2009 (SI No 272 of 2009); Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC; Improved discharge standards from the WWTP; Successful installation and operation of SUDS; Percentage of unaccounted for water. 	<ul style="list-style-type: none"> EPA Irish Water Environment Section Cork County Council. Irish Water
<p>Air Quality and Climate (AQ/C)</p> <p>EPO 6: Protect and improve air quality.</p> <p>EPO 7: Contribute to mitigation of, and adaptation to, climate change.</p>	<ul style="list-style-type: none"> Ensure air quality monitoring results are maintained within appropriate emission limits. Increase modal shift in favour of public transport, walking and cycling; Encourage energy efficiency in building design and construction; Provide flood protection measures where appropriate; Avoid inappropriate development in areas of flood risk. 	<ul style="list-style-type: none"> Trends in Air Quality monitoring data. Percentage of population travelling to work by public transport, walking or cycling. No of developments permitted within areas at risk of flooding. 	<ul style="list-style-type: none"> EPA. CS Planning register.
<p>Cultural Heritage (CH)</p> <p>EPO 8: Protect and, where appropriate, enhance the</p>	<ul style="list-style-type: none"> No loss of or adverse impact on the fabric or setting of 	<ul style="list-style-type: none"> Loss of or adverse impact on monuments on the 	<ul style="list-style-type: none"> Heritage Officer.



Table 5-1 Provision for the Monitoring of Significant Environmental Effects

Environmental Report Recommendations			
Environmental Protection Objective	Targets	Indicators	Data source
<p>character, diversity and special qualities of architectural, archaeological and cultural heritage (including Gaeltachtaí) in Mallow Environs.</p>	<p>monuments on the Record of Monuments (RMP).</p> <ul style="list-style-type: none"> • No loss of or adverse impact on the architectural heritage value or setting of protected structures. • No loss of or adverse impact on structures recorded on the National Inventory of Architectural Heritage. • Implement the Cork County Heritage Plan 	<p>Record of Monuments (RMP).</p> <ul style="list-style-type: none"> • Loss of or adverse impact on protected structures included on the RPS or structures included on the NIAH. 	
<p>Landscape (L)</p> <p>EPO 9: Protect and, where appropriate, enhance the character, diversity and special qualities of landscapes in Mallow Environs.</p>	<ul style="list-style-type: none"> • No inappropriate development permitted in areas of high scenic amenity value; • No inappropriate development permitted where it would negatively impact on views from a Scenic Route. 	<ul style="list-style-type: none"> • Number of large scale developments permitted in areas of high landscape value; • Number of developments permitted along Scenic Routes 	<ul style="list-style-type: none"> • Planning Register
<p>Material Assets (MA)</p> <p>EPO 10 Make best use of the material assets of the town and promote the sustainable development of new infrastructure to provide for the current and future needs of the population.</p>	<ul style="list-style-type: none"> • Develop the road, rail and public transport infrastructure of the county to facilitate sustainable growth and travel patterns. • Ensure appropriate water services infrastructure is delivered in areas targeted for population growth. • Protect and optimise the use of the existing building stock and brownfield land; • Facilitate the sustainable expansion of employment facilities to enable economic growth and create new employment opportunities. • Protect and recreational facilities and infrastructure. 	<ul style="list-style-type: none"> • Number of new critical infrastructural projects completed (transport, SUDs etc). 	<ul style="list-style-type: none"> • Delivery of the Critical Infrastructure per Main Settlement level will be monitored as part of CDP.