



**SKIBBEREEN DEVELOPMENT
PLAN 2009-2015**

SEA STATEMENT

August 2009

1.0 Introduction

In accordance with Article 7 of the Planning & Development Regulations 2004, section 13(l), this report consists of an SEA Statement in relation to the Skibbereen Town Development Plan 2009 - 2015 and forms the final part of the requirements for the Strategic Environmental Assessment (SEA) of the Plan.

The main purpose of the SEA Statement is to provide information on the decision-making process and to document how environmental considerations, the views of consultees and the recommendations of the Environmental Report have been taken into account in the adopted Skibbereen Development Plan 2009 - 2015. It illustrates how decisions were taken, making the process more transparent. This statement will be made available to the public to accompany the adopted Plan.

The SEA Statement includes the following information:

1. Summary of how environmental considerations and the Environmental Report were factored into the plan;
2. Summary of how submissions/consultations were taken into account: How consultation responses have been taken into account;
3. Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered;
4. Measures to monitor the significant environmental effects of implementing the Plan;

2.0 Process

As part of the preparation of the Skibbereen Development Plan, RPS Group Plc. carried out a Strategic Environmental Assessment (SEA). SEA is the process by which environmental considerations are required to be fully integrated into the preparation and adoption of Development Plans and other plans and programmes. The objective of the SEA process is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into plans and programmes with a view to promoting sustainable development.

The SEA process was undertaken in parallel with each stage of the draft Plan making process and involved close consultation and meetings with the SEA Consultation Authorities, members of HRA Planning Consultancy that drafted the Skibbereen Town Development Plan 2009 - 2015, the SEA team and a number of specialists that focused on the significant environmental issues of the plan as identified during the screening and scoping phases and assessment of baseline information for the area.

In carrying out the Strategic Environmental Assessment of the draft Skibbereen Development Plan 2009 - 2015, the SEA Team were involved in the Plan preparation process. The SEA Team were fully involved in the analysis of development options and were in a position to make suggestions throughout the process of plan preparation to ensure that environmental considerations and environmental effects were considered in the formulation of strategic aims and development objectives. Furthermore all environmental scoping responses, consultation submissions and mitigatory measures against potential environmental impacts were incorporated into the Policies and Objective of the Development Plan where possible.

3.0 Summary of How Environmental Considerations and the Environmental Report were Factored into the Plan

As part of the SEA Environmental Report, a matrix was developed and used to assess significant environmental effects of the key policies and objectives of the draft Skibbereen Development Plan. This process enabled an overview of where potential environmental problems may arise from implementation of the draft Plan and allowed for additional policies/objectives to be generated and included in the Plan. As a result of this process it was considered that the key environmental issues of the Skibbereen Development Plan as set out in Part 5 of the Plan related mainly to biodiversity as set out in table 1 appended to this statement.

Where significant effects were identified and had not been mitigated sufficiently by policies and objectives within the draft Plan, additional mitigation measures were recommended and have been incorporated where possible into the Plan. Table 1 as Appended to this Statement documents all significant effects and mitigation measures as identified in the environmental report and sets out where the proposed mitigation measures have been implemented into the Plan. A Habitats Directive Assessment of the draft Plan was also carried out and is appended to the Environmental Report in Part 5 of the Adopted Plan. This assessment concluded that no policies, objectives and proposals (i.e. critical infrastructure) of the Skibbereen Development Plan 2009 - 2015 would potentially impact negatively, including potential 'in combination' impacts, on the conservation objectives of any Natura 2000 Site. Overall it was considered that the proposed draft Plan would not have a negative impact on the environment in this regard.

Article 10 of the SEA Directive requires Member States to monitor the significant environmental effects of the implementation of plans '*in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action*'. Chapter 10 of the Environmental report sets out the monitoring proposals that will be undertaken following implementation of the policies and objectives of the Skibbereen Development Plan (these are also linked with significant effects and mitigation measures as set out in Table 1 of this statement).

4.0 Summary of how submissions/consultations were taken into account:

This section details how both the Environmental Reports and submissions and observations made to the Planning Authority on the Environmental Reports and SEA process have been taken into account during the preparation of the plan. In particular, the Manager's Reports on the Development Plan under Section 12(4) and 12(8) required under the Planning and Development Act 2000 and prepared after the formal public display periods demonstrate how particular submissions/consultations were considered. The general manner in which submissions were taken into account is outlined below.

4.1 SEA Scoping Consultations

RPS Group on behalf of Skibbereen Town Council undertook formal scoping with the three statutory Consultees between July and August 2008. Strategic Environmental Assessment scoping letters and reports were sent to the Department of the Environment, Heritage and Local Government (DoEHLG), Department of Communications, Marine and Natural Resources (DCMNR) and the Environmental Protection Agency (EPA).

Responses from all parties consulted were received by RPS by August 2008. Each of the scoping responses were taken into account during the carrying out of the Strategic Environmental Assessment and the preparation of the Environmental Report of the draft Skibbereen Town Development Plan.

The scoping exercise for this SEA determined the potential key environmental impacts and outlined how they should be addressed as part of the Environmental Report (this is documented in Table 2.1 of the Environmental Report).

4.2 Initial Public Consultation Period

The draft Skibbereen Town Development Plan and Environmental Report went on public display between November 2008 and January 2009 and submissions were invited from the public, from the relevant statutory bodies and the Environmental Authorities.

In order to document the SEA process, since the initial Consultation draft of the Final Environmental Report was updated to include the following changes:

- Suggestions and comments received from the environmental authorities.
- Assessment of significant amendments to the draft Development Plan arising from the initial consultation process.

Consultation responses were received by Skibbereen Town Council from the Department of the Environment, Heritage and Local Government (DoEHLG) and the Environmental Protection Agency (EPA) in January and February 2009.

A submission from the DoEHLG Spatial Planning Policy Development Applications Unit was received suggesting a number of changes to the Draft Plan in relation to updates in Planning Policy and also set out comments in relation to architectural heritage and archaeology. However no comments were received in relation to the Environmental Report.

A submission from the EPA was received relating to the possible impacts of the Draft Development Plan on various aspects of the environment and also included comments relating to the Environmental Report. The EPA submission was broken into two parts and the second part of the submission related to the Environmental Report for the Draft Development Plan. Comments and suggestions in this section put forward for consideration mainly related to the key stages and outputs of the SEA process.

In response to the EPA's submission to the consultation draft Environmental Report a number of amendments were made to the environmental report and all changes are documented within the relevant Skibbereen Town Development Plan Manager's Reports and the Final Environmental Report.

4.3 Consultation of Habitats Directive Assessment

A Habitats Directive Assessment screening exercise on the draft Plan was also undertaken by RPS Group and the associated screening report is attached in Appendix 2 of the Final Environmental Report in Part 5 of the Adopted Plan. This document went on public display during the Amendment Stage consultation period. As part of the screening process the NPWS were consulted and it was concluded that a full appropriate assessment of the draft plan would not be required.

4.4 Assessment of Material Amendments

As a result of the initial consultation submissions made to the draft plan a number of amendments were recommended by the Manager and were set out in the Section 12 (4) Manager's Report which went out on consultation in May 2009. The proposed amendments were also environmentally assessed and this assessment also went on consultation in May 2009. The environmental report was also updated to reflect the amendments to the Plan.

After the initial consultation period of the amendments as per the Section 12 (4) Managers in May 2009 the Manager drafted the Section 12 (8) Manager's Report setting out the Manager's Response and Recommendations to the issues raised in the submissions received during the statutory public consultation period. The s.12 (8) Managers Report was presented to the members in July 2009 containing four minor amendments. No material changes were made to the Plan at this stage and therefore no additional amendments were assessed in terms of SEA at this stage.

To conclude it was not considered that any of the proposed amendments of the draft Plan would have a significant impact on the environment of the area.

4.5 Adoption of the Plan

The Plan was formally 'made' at a meeting on 13th August 2009. At this meeting the Council accepted all recommendations contained in the s.12 (8) report and agreed to adopt the amended draft development plan.

5.0 Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered

Article 5 of the SEA Directive requires the environmental report to consider "*reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme*" and the significant effects of the alternatives selected. Therefore as part of the SEA process three development strategies for the Plan area were assessed in order to determine the preferred development strategy for the Plan area with the least environmental effects. The three alternatives considered included a 'Do-nothing approach', an alternative to 'Rezone sufficient lands as a natural extension of the town centre'; and an alternative to 'Extend new development zonings on remaining undeveloped Greenfield lands within the town boundary'.

In review of the three alternative development options available to the town it was considered that the alternative to extend new development on remaining undeveloped Greenfield lands within the town boundary would not help to consolidate the town centre, nor would it promote walking or cycling or make use of the existing services in the town centre and therefore this option was considered unsustainable due to the dispersed nature of growth and potential to have impacts on the environment. Given the extent of residentially zoned lands within the town it was considered that a sequential approach to phasing of residential development should be introduced in the plan area. The 'do-nothing' strategy was not the chosen strategy for the development of the town as it was considered that new protective policies and objectives of the plan could not be introduced and the Plan would not be sufficiently updated in accordance with national policy and guidance.

Based on the policy context, issues and needs facing the town it was considered that the preferred alternative as set out in the SEA should be to develop the town in a compact and sustainable manner and to restrict expansion outwards through the intensification of the existing Town Centre, redeveloping brownfield sites and Greenfield sites only where there is a natural extension to existing zoning to the north east of the town. It was considered that this development strategy would allow for the intensification of the town centre and the consolidation and expansion of existing services to accessible lands close to the town centre. Accordingly this strategy aims to address a number of the matters facing the town including the need to focus development on the town centre with an adequately flexible approach to attract key operators to the town. This alternative is reflected in the vision of the plan, which is to develop as a compact and self contained town, acting as an economic and service provider for the surrounding rural hinterland, with a strong combination of industry, services, arts, culture and tourism.

6.0 Monitoring measures

The SEA Directive requires that significant environmental effects of the implementation of a plan is monitored in order to identify, at an early stage, unforeseen adverse effects and to be able to undertake appropriate remedial action. Monitoring can also be used to analyse whether the Development Plan is achieving its Environmental Protection Objectives and targets, whether such objectives need to be re-examined and whether the proposed mitigation measures are being implemented.

The primary purpose of monitoring is to cross check significant environmental impacts which arise during the implementation stage against those predicted during the plans preparation stage.

Chapter 10 of the Environmental Report sets out the monitoring proposals to monitor significant effects and implementation of mitigation measures to be undertaken following implementation of the policies and objectives of the Skibbereen Town Development Plan (these are also linked with significant effects and mitigation measures in Table 1 below). Table 10.1 of the environmental report sets out specific potential environmental impacts and indicators and targets to allow monitoring of the quantitative trends and progress over time relating to the significant impacts.

Skibbereen Town Council is responsible to monitor the significant environmental effects arising from the implementation of the Skibbereen Development Plan 2009 – 2015. However as set out in the Cork County Development Plan 2009 potential impacts are also considered in a national, regional and local context, which can be referred to where possible. Furthermore the Cork County Planning Policy Unit are carrying out survey work in terms of the review of the Local Area Plans for the entire County, which can be referred to in terms of future monitoring for the Skibbereen Town Development Plan also.

Table 1: Trends, Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of draft Skibbereen Town Development Plan Environmental Report

Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the draft Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in Table 10.1)
<p>Biodiversity</p> <p>The discharge of raw sewage from Skibbereen town into the Ilen River and the Caol stream has serious implications for these waterways. These waterways flow directly in Roaringwater Bay, which is designated as a cSAC and as a shellfish water. This is potentially a significant problem for implementation of the EU Habitats and Shellfish Waters Directives.</p> <p>There is potential for impacts on the aquatic environment in the form of residential, industrial and agricultural run-off, other municipal sources of pollution, fragmentation of river corridors and soil erosion. These risks apply in particular to the Ilen River. Under the Water Framework Directive, water quality must achieve "good status" by 2015.</p>	<p>Possibly significant if not mitigated</p>	<p>SEA recommends the inclusion of a new policy to ensure that developments along the Ilen River or the Caol Stream do not negatively impact the ecology of these waterway due to a vegetation removal and the loss of habitat through consultation with National Parks and Wildlife Services."</p> <p>(Policy ENV 3 – 1 and Objectives WU1 and WU4 adequately address matters)</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: B1, B2, W1, W2, M1, M2</p>
<p>Invasive species: There is potential for invasive species to enter surface waters and marine systems from a number of sources including runoff from garden centres, from boats, by dumping of waste from fish tanks and garden ponds, and perhaps also from aquaculture facilities. There is therefore a need to include a policy in the new plan to prevent the introduction of those alien species, which threaten ecosystems, habitats, or species. The utilisation of native species in amenity planting and stocking along with change in community actions to reduce the introduction and spread of non-native species should be encouraged.</p>	<p>Possibly significant if not mitigated</p>	<p>SEA recommends the inclusion of a new objective to ensure that invasive species are not introduced into the environment of Skibbereen, or into adjacent semi-natural habitats, particularly the River Ilen.</p> <p>Also suggest inclusion of policy setting out that native species will be used for amenity and landscape planting wherever possible, and if non-native species are to be used an appropriately qualified ecologist will be consulted as to their suitability.</p> <p>(Policy ENV 3 – 1 adequately addresses this matter)</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: B1, S1, S2,</p>

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<p>Removal of Ecological Corridors: The removal of ecological networks / corridors is a significant issue. It is recognised that there has been a significant increase in hedgerow removal throughout Ireland in recent years.</p>	<p>Possibly significant if not mitigated</p>	<p>SEA suggests inclusion of a policy/objective for Skibbereen Town Council to undertake habitat surveys with the aim of identifying hedgerows, semi-natural habitats, important sites for fauna, etc. These studies will provide a mechanism for management of hedgerows and other ecological corridors in the study area.</p> <p>(Adequately addressed in Objective ENV9)</p> <p>SEA suggests inclusion of a policy/objective to maintain features of the landscape that serve as refuges for wild plants, such as hedgerows, trees, rivers, lakes, parklands, stonewalls, ponds and roadside verges where possible.</p> <p>(Adequately addressed in Policy ENV3 – 4)</p> <p>SEA suggests inclusion of a policy/objective for the Promotion of linkages between local biodiversity features and ecological networks e.g. stone walls, hedgerows, watercourses etc. and sufficient buffer zones from areas zoned for development.</p> <p>(Addressed in Policy ENV3 – 1, however it is considered that other than the a set back of 3m from the waters edge of the Ilven River on Objective UD4, all other specified buffers shall be assessed on its own merit during the development management process.)</p> <p>SEA suggests inclusion of a policy/objective to support the implementation and actions of the County Biodiversity Action Plan, which is due to be published shortly.</p> <p>(Addressed in Objective ENV9)</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: B1, S1, S2, S3</p>

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Population and Human Health			
<p>Impacts on human health resulting from lack of waste water treatment facilities and associated risk to water quality in the area.</p> <p>A number of private drinking water supplies are taken from groundwater reserves. The Water Framework Directive classifies a large proportion of the Skibbereen urban area groundwater as "Possibly at Risk of Not Achieving Good Status" which therefore poses a threat to human health.</p>	<p>Significant if not mitigated</p>	<p>Mitigation as proposed below under water and material assets.</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: S1, S2</p>
Soil			
<p>Greenfield sites - any proposed developments on greenfield sites involves changing the character of the ground and soil. New developments have the potential to contaminate the soil and underlying groundwater, particularly in the case of septic tanks and poor wastewater treatment facilities. Existing activities such as agriculture and manufacturing may also pose a risk to soil and groundwater.</p>	<p>Possibly significant if not mitigated</p>	<p>The SEA recommends inclusion of a specific policy for the development of brownfield sites over Greenfield sites both within the town centre and hinterland where available.</p> <p>(Adequately addressed in Objective TC6 and Policy TC 3 – 1 and TC 3 – 2)</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: S1, S2</p>
Water			
<p>Surface Water Pollution -Under the WFD, the River Ilen situated within the town boundary and the Ilen Estuary situated south west of Skibbereen has been classified by the EPA as "Possibly at risk of not achieving good status", both are directly related and may possibly be at risk if controls are not enforced.</p>	<p>Possibly significant if not mitigated</p>	<p>The SEA recommends inclusion of a policy committing to meeting the requirements of the Water Framework Directive through maintaining high status or good status of waters where they exist and to achieve good quality status in all other waters by 2015. Good water is measured in quantity, quality and ecology for surface water and quantity and quality for</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: W1, W2, W3, W4, M1, M2</p>

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<p>Municipal Wastewater Treatment and Domestic Wastewater Treatment – There is a possibility of unchecked increase in demand for wastewater treatment with potential for increased pollution to surface waters. Therefore correct treatment of wastewater is an important factor to consider in the quality of surface water. It is essential that the new proposed WWTP is constructed by 2009 and that it operates to highest standards. It is also deemed necessary that monitoring of the performance of wastewater treatment plant and sewerage network is undertaken to capture leakages to GW and SW.</p>	<p>Possibly significant if not mitigated</p>	<p>groundwater. (This is adequately addressed in Policy WU – 1)</p> <p>The SEA suggests that the following Objective 'WU4 <i>Ensure completion of the new sewerage scheme in Skibbreen in a timely fashion</i>' should be amended to state: '<i>Ensure completion of the new sewerage scheme in Skibbreen by 2009.</i>' (Objective WU4 has been amended)</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: PH2, W1</p>
Air and Climate			
<p>Climate Change: Until recently biodiversity losses have been attributed to the spread and increased environmental impact of people, however, it seems likely that future losses will increasingly result from human induced global climate change. Climate change considerations including flooding risk must therefore be seen as central to the protection of the natural environment.</p>	<p>No significant effect proposed as a result of the implementation of the Plan.</p>	<p>The SEA suggests the inclusion of a policy to implement the objectives and measures of the National Climate Change Strategy 2007-2012. (The Plan contains many policy commitments that endeavor to achieve wider sustainable development objectives across a variety of sections of the Plan. Furthermore it is considered that Chapter 15 which refers to sustainability adequately addresses and promotes principles to combat climate change)</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: A1, PH1</p>
Material Assets			
<p>The EPA made a specific recommendation in their Scoping Response of 13th August 2008 to set a timeline for</p>	<p>Not significant but pro-active</p>	<p>The SEA suggests the inclusion of a timeframe for the Waste Water Treatment Plant Upgrade.</p>	<p>Refer to Monitoring Programme As Indicated In</p>

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<p>completion of the WWTP.</p> <p>The Water Framework Directive classifies a large proportion of the Skibbereen urban area groundwater as "Possibly at Risk of Not Achieving Good Status". A number of private drinking water supplies are taken from groundwater reserves, which could potentially be polluted from domestic septic tanks.</p>	<p>Possibly significant if not mitigated</p>	<p>(Adequately addressed in section 14.2.2 of the Plan)</p> <p>The SEA suggests the inclusion of a policy to ensure that all developments currently served by septic tanks should be connected to the WWTP where possible.</p> <p>(This policy inclusion has been noted but not amended as such a policy could lead to the uneconomic extension of services in the area. There is already pressure for services to be extended to agricultural lands in the town to serve one off housing and such a policy could exacerbate the situation.)</p>	<p>Table 10.1: W1, W2, M1, M2</p> <p>Refer to Monitoring Programme As Indicated In Table 10.1: M1, W1, W2, W3, W4</p>
<p>Cultural Heritage</p>			
<p>Text for inclusion in terms of protection of national monuments.</p>	<p>Possibly significant if not mitigated</p>	<p>Any direct impacts on national monuments in State or Local Authority care or subject to a preservation order will require the consent of the Minister for the Environment, Heritage and Local Government under Section 14 of the National Monuments Act 1930 as amended by Section 5 of the National Monuments (Amendment) Act 2004.</p> <p>(Adequately addressed in section 17.1.2 of the Plan)</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: CH1, CH2</p>
<p>Potential Impacts on the coastal/Riverine and inter-tidal zone</p>	<p>Possibly significant if not mitigated</p>	<p>The archaeological potential of the coastal/Riverine and inter-tidal zone, where relevant, should be carefully considered. Any potential impacts on archaeological heritage should be subject to full archaeological assessment. (i.e. not just medium to major scale developments as noted in the plan).</p> <p>(Adequately addressed in section 17.1.2 and Table 17.4.1 of the Plan)</p>	<p>Refer to Monitoring Programme As Indicated In Table 10.1: CH1, CH2</p>

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