SEA STATEMENT

OF THE

VARIATION No. 2 (SANDYFORD URBAN FRAMEWORK PLAN)

TO THE

Dún Laoghaire-Rathdown County Development Plan 2010-2016

STRATEGIC ENVIRONMENTAL ASSESSMENT

for: Dún Laoghaire-Rathdown County Council

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Section 1 Introduction

1.1 Terms of Reference

This is the SEA Statement of Variation No. 2 to the Dún Laoghaire-Rathdown County Development Plan (CDP) 2010-2016 Strategic Environmental Assessment (SEA).

1.2 SEA Definition

SEA is a systematic process of predicting and evaluating the likely environmental effects of implementing a plan, or other strategic action, in order to ensure that these effects are appropriately addressed at the earliest appropriate stage of decision-making on a par with economic and social considerations.

1.3 Legislative Context

Directive 2001/42/FC 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, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including land use planning. The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI No. 435 of 2004), and, the Planning and Development Environmental (Strategic Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of regulations became operational on 21 July 2004.

The SEA Directive and the instruments transposing it into Irish Law require that after the adoption of a plan or programme, the plan or programme making authority is required to make a Statement available to the public, the competent environmental authorities and, where relevant, neighbouring countries. This Statement is referred to as an SEA Statement (DEHLG, 2004)¹.

1.4 Content of the SEA Statement

The SEA Statement is required to include information summarising:

- a) how environmental considerations have been integrated into the Variation,
- b) how
 - the environmental report,
 - submissions and observations made to the planning authority on the proposed Variation and Environmental Report, and
 - any transboundary consultations [this is not relevant to this SEA]

have been taken into account during the preparation of the Variation,

- the reasons for choosing the Variation, 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 County Development Plan as varied.

1.5 Implications of SEA for the Plan

As a result of the aforementioned legislation, Variation No. 2 to the Dún Laoghaire-Rathdown CDP 2010-2016 was required to undergo SEA.

The findings of the SEA were expressed in an Environmental Report January 2010 which accompanied the Proposed Variation. The Environmental Report was updated by way of Addenda in May 2011 (see Section 3.4) to take account of the proposed Material Laterations being made to the Proposed Variation. On adoption of the Variation, the Addenda were used to update the original Environmental Report into a final, consolidated Environmental Report which is available alongside the adopted Variation. At each stage of the process the Elected Members took into account the findings of the Environmental Report and/or the Addenda as appropriate.

¹ Department of the Environment, Heritage and Local Government (2004) *Implementation of SEA Directive* (2001/42/EC): Guidelines for Regional Authorities and Planning Authorities Dublin: Government of Ireland.

Section 2 How Environmental Considerations were integrated into the Plan

2.1 Consultations

As environmental authorities identified under the SEA Regulations, the Environmental Protection Agency (EPA), the Department of the Environment, Heritage and Local Government (DEHLG) and the Department of Communications, Energy and Natural Resources (DCENR)² were all sent SEA scoping notices indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report could be made to the Council.

Written submissions on the scope of the SEA were received from each of the environmental authorities and these were taken into account during the formulation of the scope of the SEA.

In addition, a number of submissions were made on the Proposed Variation, Environmental Report, Proposed Material Alterations and Addenda while they were on public display. Further information on these is provided under Section 3.2.

2.2 Environmental Sensitivities

2.2.1 Mapping and Early Communication

Environmental considerations were integrated into the Proposed Variation before it was placed on public display for the first time.

Environmental sensitivities were mapped in order to identify which areas would be most sensitive to development and would suffer the most adverse effects if growth was to be accommodated in those areas unmitigated.

The sensitivities were communicated to the planning team in the Council on a regular basis

² The Marine function of the Department of Communications, Marine and Natural Resources has been transferred to the Department of Agriculture Food and Fisheries

from the outset of the Variation preparation process. Identifying areas with the most limited carrying capacity within the Variation area helped future growth to be diverted away from these areas.

The sensitivities considered by the SEA included the following:

- Habitat Mapping;
- Designated ecological sites;
- Land cover;
- Soils, subsoils and geology;
- Water Framework Directive (WFD) status of surface waters;
- WFD status of ground waters;
- WFD Register of Protected Areas;
- Geological Survey Ireland aquifer vulnerability and productivity;
- Office of Public Works (OPW) Flood Events;
- Noise mapping;
- Waste water treatment capacity and demand;
- Drinking water supply and quality;
- Archaeological heritage;
- Architectural heritage;
- High Amenity Areas; and
- Landscape Character Areas.

A number of these sensitivities are mapped on Figure 2.1, Figure 2.2 and Figure 2.3.

2.3 Early Identification and Evaluation of Alternatives

A range of potential alternative scenarios for the Variation were identified at an early stage in the process and evaluated for their likely significant environmental effects (see Section 4).

The environmental baseline description - including the sensitivities mapping shown on Figures 2.1 to 2.3 - were used in order to predict and evaluate the environmental effects of implementing the scenarios.

Communication of the findings of this evaluation helped the planning team to make an informed choice as to which alternative was to be put before the Elected Members as the Proposed Variation.

Communication of this evaluation to the Elected Members through the Environmental Report helped the Elected Members to make an informed choice with regard to the adoption of the Variation.

Mitigation measures which will enable potential adverse environmental effects to be avoided, reduced or offset are detailed under Section 2.5 of this report.

2.4 Appropriate Assessment

An Appropriate Assessment (AA) has been undertaken alongside the preparation and adoption Variation. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC).

The preparation and adoption of the Variation, SEA and AA have taken place concurrently and the findings of the AA have informed the preparation of both the Variation and the SEA.

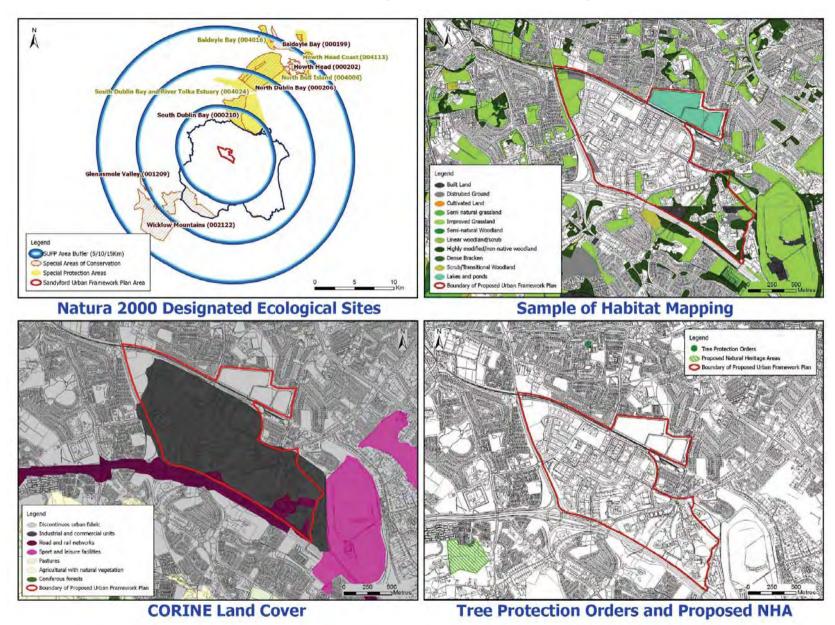


Figure 2.1 Environmental Sensitivities (Set 1 of 3)

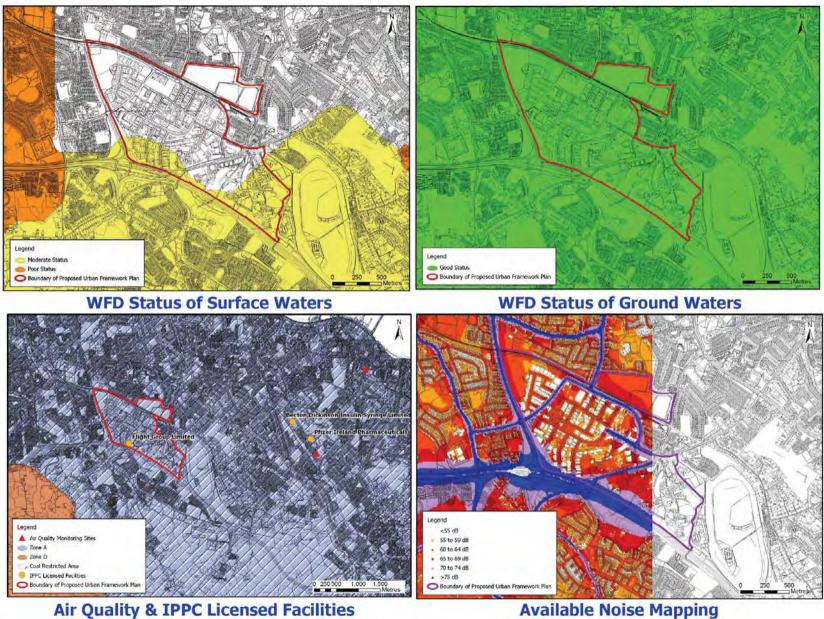


Figure 2.2 Environmental Sensitivities (Set 2 of 3)

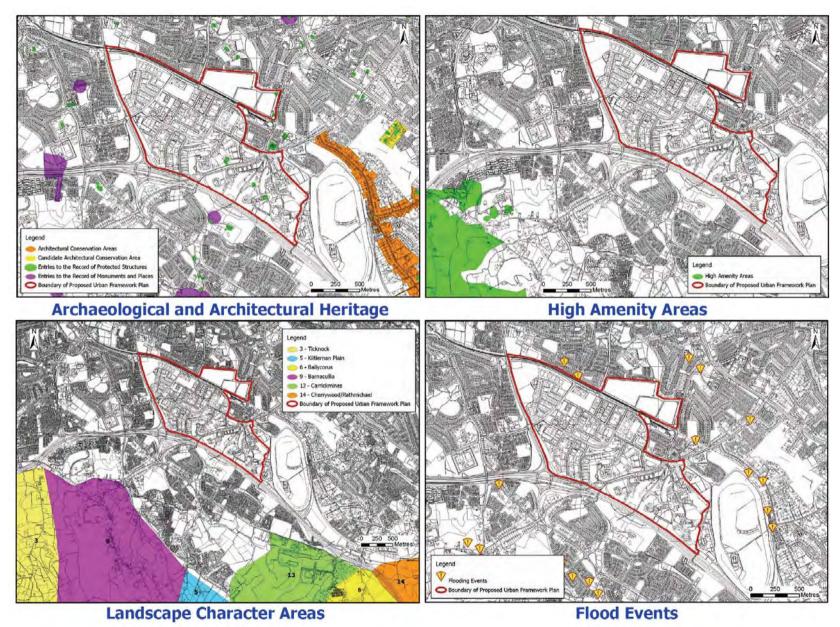


Figure 2.3 Environmental Sensitivities (Set 3 of 3)

2.5 Mitigation

2.5.1 Introduction

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing Variation No. 2 (Sandyford Urban Framework Plan) to the Dún Laoghaire-Rathdown County Development Plan 2010-2016.

Mitigation was achieved by taking into account the findings of the SEA through the:

- The consideration of alternatives for the Variation:
- Adherence to measures which have been integrated into the Variation; and,
- Adherence to relevant mitigation measures which are currently in force through the existing County Development Plan.

2.5.2 Mitigation through Consideration of Alternatives

A range of potential alternative scenarios for the Variation were identified at an early stage in the process and evaluated for their likely significant environmental effects (see Section 4).

The environmental effects of implementing the alternatives were predicted and evaluated. Communication of the findings of this evaluation helped the Planning team make an informed choice as to which alternative was to be put before the Members of the Council. Communication of this evaluation to the Members of the Council through this report assisted the Members to make an informed choice with regard to the adoption of the Variation.

2.5.3 Measures integrated into the Variation

A number of measures were integrated into the Variation which are likely to maximise the likely significant beneficial environmental effects of implementing the Variation and contribute towards the avoidance, reduction or offsetting of potential adverse environmental effects. These

measures include those which are listed under the topics below.

The policy and objective numbers are those which accompany the relevant measures in the Variation.

Sustainable Mobility³

- Overall strategy/provisions adopted by the SUFP
- Height Policy SUFP3 and Objectives BH1, BH2 and BH3
- Public Realm Policy SUFP 4 and Objectives PR1, PR2, PR3, PR5, PR6, PR7 and PR8
- Way Finding Policy SUFP 5 and Objectives WF1, WF2 and WF3
- Infrastructure Policy SUFP6
- Multi Modal Transport Infrastructure Policy SUFP7 and Objectives TAM1 to TAM12, TAM14, TAM19 and TAM21
- Density Policy SUFP2 and Objectives DS1 to DS4
- Various Community Infrastructure provisions, including those relating to open space, community facilities and education
- Phasing Objectives P1 and P6
- Funding Policy SUFP13 and Objective M1
- Specific Local Objectives 109 to 114 and 116 to 121

Water Services Infrastructure⁴

- Infrastructure Policy SUFP6
- Foul Drainage Objectives FD1 to FD3
- Water Supply Objectives WS1 & WS2
- Phasing Objectives P7 and P8
- ³ Note that these measures are likely to benefit:
 - reductions in transport related greenhouse gas emissions;
 - a modal change from car to more sustainable forms of transport; and,
 - the protection of human health with regard to transport related air and noise emissions.
- ⁴ Note that these measures are likely to benefit:
 - the provision of appropriate waste water treatment;
 - the provision of sufficient quality and quantity of drinking water;
 - the protection of the quality of water bodies; and,
 - the protection of biodiversity.

Drainage Infrastructure⁵

- Infrastructure Policy SUFP6
- Surface Water Objectives SWD1 and SWD2
- Public Realm Objective PR10

Open Space⁶

- Open Space Objective F Zone 7 and Objectives F1 to F6
- Open Space Policy SUFP8 and Objectives OS1 to OS4
- Public Realm Objectives PR8 and PR9
- Phasing Objective P1
- Specific Local Objectives 115 and 121

Providing for Brownfield Development

 By providing for development in Sandyford, the overall strategy/provisions adopted by the SUFP is likely to reduce the need to develop greenfield areas elsewhere; this will benefit the protection of various environmental components.

2.5.4 Mitigation Measures already in force through the existing County Development Plan

The Dún Laoghaire-Rathdown County Development Plan (CDP) 2010-2016 to which Variation No. 2 (Sandyford Urban Framework Plan) relates has undergone a process of Strategic Environmental Assessment which resulted in the integration of a number of mitigation measures into the Plan through Policy LHB27. New development in the Urban Framework Plan area must comply with these measures.

became part of the CDP and any development which arises on foot CDP as varied by the SUFP will have to comply with these measures. Mitigation measures which are already in force through the existing CDP and will apply to developments within the Variation lands, are detailed overleaf.

On making of the Variation, the Variation

Biodiversity and Flora and Fauna I

No projects giving rise to significant direct, indirect or secondary impacts on Natura 2000 sites arising from their size or scale, land take, proximity, resource requirements, emissions (disposal to land, water or air), transportation requirements, duration of construction, operation, decommissioning or from any other effects shall be permitted on the basis of this Plan (either individually or in combination with other plans or projects)⁷.

Biodiversity and Flora and Fauna II

All subsequent plan-making and adoption of plans arising from this Plan will be screened for the need to undertake Appropriate Assessment under Article 6 of the Habitats Directive.

Biodiversity and Flora and Fauna III

The Council shall set up procedures to ensure compliance by plan-makers with the requirement of Article 6 of the Habitats Directive for land use plans.

Biodiversity and Flora and Fauna IV

No ecological networks or parts thereof which provide significant connectivity between areas of local biodiversity are to be lost without remediation as a result of implementation of the CDP.

Water Protection I

The Council shall address the significant water management issues identified in the Water Matters Consultation publications for the Eastern River Basin District.

- the minimisation of flood risk; and,
- the protection of human health.

- the protection of local habitats:
- the protection of residential amenity;
- the protection of cultural heritage and its setting; and,
- the availability of flood risk management options.

⁵ Note that these measures are likely to benefit:

⁶ Note that these measures are likely to benefit:

⁷ Except as provided for in Section 6(4) of the Habitats Directive, viz.There must be:

⁽a) no alternative solution available,

⁽b) imperative reasons of overriding public interest for the plan to proceed; and

⁽c) adequate compensatory measures in place.

Water Protection II

When adopted, the relevant policies and objectives of the Eastern River Basin Management Plan and associated Programme of Measures shall be integrated into the Plan through amendment or otherwise.

Water Protection IV

The Council shall ensure that the ongoing development of the County is undertaken in such a way so as not to compromise the quality of surface water (and associated habitats and species) and groundwater.

Landuses shall not give rise to the pollution of ground or surface waters during the construction or operation of developments. This shall be achieved through the adherence to best practice in the design, installation and management of systems for the interception, collection and appropriate disposal or treatment of all surface waters and effluents.

Bathing Water I

The Council shall comply with the provisions of the Bathing Water Regulations to ensure that where any bathing water fails the mandatory bathing standards that the public are made aware of this fact by means of information notices posted at the bathing area.

Bathing Water II

The Council shall ensure compliance with Directive on bathing water (Directive 2006/7/EC) as implemented by the Bathing Water Quality Regulations 2008 (S.I. No. 79) of 2008 and particular to:

- ensure bathing waters achieve "sufficient or better status by 2015".
- increase the number of bathing waters classified as "good or "excellent".

Waste Water I

Development under the Plan shall be preceded by sufficient capacity in the public waste water treatment plants and appropriate extensions in the existing public waste water treatment catchments.

Waste Water II

The Council shall implement the relevant recommendations set out in *Urban Waste Water Discharges in Ireland for Population Equivalents*

Greater than 500 Persons – A Report for the Years 2006 and 2007 (EPA Office of Environment Enforcement, 2009).

Waste Water III

The Council shall examine the feasibility of connecting of unsewered, areas including individual properties/ premises, serviced by septic tanks to existing and planned sewer networks.

Drinking Water I

Dún Laoghaire-Rathdown County Council shall ensure conformance with the relevant recommendations set out in *The Provision and Quality of Drinking Water in Ireland - A Report for the Years 2007-2008* (EPA Office of Environment Enforcement, 2009).

Drinking Water II

Existing and new populations under the CDP shall be served with clean and wholesome drinking water. The Council will help to ensure that compliance is achieved as a minimum with regard to the 48 parameters set out under the European Communities (Drinking Water) Regulations (No. 2) 2007 and will help to resolve any issues if they arise in order to achieve the removal of public water supplies from the EPA remedial action list of public water supplies.

Flooding III

It is Council policy to implement the recommendations of the most recent version of the Department of the Environment, Heritage and Local Government and the Office of Public Works Guidelines on "The Planning System and Flood Risk Management" including using the Guidelines to assess applications for planning permission.

Flooding IV

The Council shall fulfil its responsibilities under the Flood Risk Directive 2007/60/EC and it is Council policy to assist and cooperate with the Office of Public Works in developing Catchment-based Flood Risk Management Plans. Any recommendations and outputs arising from the Flood Risk Management Plans for Dún Laoghaire-Rathdown will require to be incorporated into the Development Plan.

Flooding V

It is Council policy to ensure that all development proposals incorporate Sustainable Urban Drainage Systems (SUDS).

Soil and Contamination I

The Council shall ensure that adequate and appropriate investigations are carried out into the nature and extent of any soil and groundwater contamination and the risks associated with site development work, where brownfield development is proposed.

Cultural Heritage I

Landuses shall not give rise to significant losses of the integrity, quality or context of archaeological material - except as may be conditioned or directed by the appropriate heritage agencies. This shall be achieved by the application of appropriate design standards and criteria.

Cultural Heritage II

It shall be ensured that pre-development archaeological testing, surveying, monitoring and recording are carried out where appropriate.

Cultural Heritage III

In order to protect, strengthen and improve the presentation and the general character of Dún Laoghaire-Rathdown, alterations and interventions to Protected Structures shall be executed to the highest conservation standards, and shall not detract from their significance or value.

Cultural Heritage IV

Planning applications for developments in sensitive areas shall be accompanied by an assessment undertaken by an accredited conservation architect, where appropriate, detailing the impacts of the relevant development upon the special interest and character of the surrounding architectural heritage. Dún Laoghaire-Rathdown County Council shall be consulted at an early stage in this regard in order to determine whether there is a need for such an assessment or for specific mitigation measures.

Cultural Heritage V

It is Council policy to consider further amendments to the record of Protected Structures following the publication of the National Inventory of Architectural Heritage of the County.

Landscape

Planning Applications that have the potential to significantly adversely impact upon landscapes attributed with a High Amenity zoning objective or upon protected views or prospects shall required to be accompanied by an assessment of the potential landscape and visual impacts of the proposed development - demonstrating that landscape impacts have been anticipated and avoided to a level consistent with the sensitivity of the landscape.

Air and Noise I

It is Council policy to implement the provisions of National legislation and EU Directives on air and noise pollution in conjunction with other agencies as appropriate.

Air and Noise II

The Council shall minimise increases in, and where possible, reduce, the quantity of the County's population exposed to excessive noise levels arising from land uses

Transportation I

It is Council policy to introduce traffic calming and traffic management schemes on particular roads and in appropriate areas throughout the County to effect an overall reduction in vehicle speeds to an acceptable level and to reduce the potential for traffic congestion and associated vehicular emissions in urban areas.

Waste Management I

The Council shall ensure the implementation of an integrated approach to waste management for any proposed development(s) within the lands in question – to include wastes generated during the construction phase of development as well as the operation and maintenance phases – having particular regard to "Best Practice Guidelines on the preparation of Waste Management Plans for Construction & Demolition Projects" July 2006.

Section 3 Environmental Report and Submissions & 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

As noted under Section 2.1, written submissions on the scope of the SEA were received from each of the environmental authorities - the EPA, the DEHLG and the DCENR - and these were taken into account during the formulation of the scope of the SEA.

The EPA's scoping submission covered a number of topics including:

- Up-to-date Environmental Monitoring Data etc.;
- Geographical Information Systems;
- Appropriate Assessment;
- Scoping Meetings/Workshops;
- Alternatives;
- Consultation
- Assessment of Likely Significant Effects;
- Mitigation of Significant Effects;
- Monitoring Proposals;
- Process and SEA-Environmental Report Compliance;
- Integration of SEA and Plan/Programme;
- Documentation of the SEA Process;
- Possible Proposed Amendments to the Draft Plan;
- Information on the Decision/ SEA Statement;
- SEA Guidance /Methodology
- Environmental Authorities;
- Water;
- Water Framework Directive;
- Drinking Water/Water Supply;
- Waste Water Treatment;
- Groundwater Protection;
- Bathing Water;
- Water Conservation;
- Water Services Act 2007;
- Flood Prevention and Management;

- Integration of infrastructure, zoning and development;
- Biodiversity;
- EU Protected Habitats and Species in Ireland:
- National Biodiversity Data Centre (NBDC);
- Annex I/ Annex II Habitats Directive;
- Management Plans for Designated Areas;
- Fisheries:
- Buffer Zones;
- Appropriate Assessment;
- Non-Designated Habitats and Species;
- Habitat Mapping;
- Alien species and Noxious Weeds;
- Inland waters rivers, streams, wetlands:
- Air, Noise and Climatic Factors;
- Energy Conservation/Renewable Energy;
- Landscape Character Assessment;
- Human Health/Quality of Life;
- Transportation;
- Tourism;
- Infrastructure Planning;
- Urban Waste Water Discharge Licensing;
- Waste Management;
- Environmental Impact Assessment;
- Strategic Environmental Assessment;
- Obligations with respect to national plans and policies and EU environmental legislation; and,
- EPA Report: Ireland's Environment 2008
 Main Environmental Challenges.

The submission was accompanied by an *SEA Pack* which comprised a combination of Guidance, Checklists and other information. Key topics covered included:

- Drinking Water;
- Urban Waste Water Discharges;
- Wetlands Conservation and Protection; and,
- Appropriate Assessment.

The DEHLG's scoping submission covered a number of topics including:

- Nature Conservation;
- Strategic Environmental Objectives;

- Archaeology;
- National Monuments Service website www.archaeology.ie;
- Impacts on sub-surface archaeology; and,
- Records of the National Museum of Ireland.

The DCENR's submission stated that the Department had no observations to make on the Proposed Variation.

3.3 Submissions and Observations

Three submissions⁸ made while the Proposed Variation and the SEA Environmental Report were on public display referred directly to the Environmental Report. The information contained in these submissions was taken into account by the SEA as well as the Appropriate Assessment which was undertaken for the Proposed Variation.

The submissions resulted in the following updates being made to the Environmental Report which were identified as follows:

[new text in green; deleted text in strikethrough]

A) To insert a new subsection 2.9.2 entitled 'Baseline Data' as follows:

2.9.2 Baseline Data

In compliance with the SEA Directive and in order to describe the baseline (the current state of the environment) at Sandyford, data was collated from currently available, environmental sources. In compliance the European principle subsidiarity, primary data collection will undertaken by lower environmental assessments as relevant and appropriate. The most recent datasets are used by the assessment and limitations are noted.

With regard to air quality, in compliance with the European principle of subsidiarity, primary data collection will be undertaken by lower tier environmental assessments as relevant and appropriate. Sections 7 and 8 of this report include an assessment of the likely significant environmental effects of the provisions of the Proposed Variation, including those on air quality.

There is currently no published local landscape mapping for the Variation lands however available information from the County Development Plan is utilised. This information shows that there are no landscape units, views or prospects which have a recognised county, national, European Union, international protection status within or adjacent to the area.

Noise mapping which was prepared by Dublin City Council, Fingal County Council, South Dublin County Council and Dún Laoghaire-Rathdown County Council in 2008 was included in the ER. However, a complete GIS dataset was not available at the time of writing the ER. Sections 7 and 8 of this report include an assessment of the likely significant environmental effects of the provisions of the Proposed Variation, including those on noise.

With regard to architectural heritage, there are no entries to the National Inventory of Archaeological Heritage (NIAH) as an NIAH survey has not been undertaken in the County; however, entries to the Record of Protected Structures included in the County Development Plan were considered by the SEA.

B) To replace the following sentence in Section 3.4.3 of the ER:

'Although air quality in the Proposed Variation area meets current standards, traffic "hotspots" may give rise to a harsh sensory environment which may impact upon human health.'

⁸ These submissions were those made by:

The Stillorgan District, Community and Residents Alliance;

Mr. Eamon Ryan; and,

[•] Environmental Protection Agency.

With:

Air quality as assessed by the EPA in the wider Dublin Conurbation Air Quality zone in which Sandyford is located is assessed as being currently good and meeting relevant standards. 'However local air quality issues may occur within and adjacent to the Variation lands e.g. traffic "hotspots" may give rise to a harsh sensory environment which may impact upon human health and localised PM10 and PM2.5 air pollution incidences likely to occur when demolition/construction takes place.

C) To note in Section 11 of the ER and Section 5 of the non-technical summary that:

All indicators are linked to the SEOs identified in Section 4 of the Environmental Report and they share the same codes e.g. SEO B1 is linked to Indicator B1.

D) To amend sentence in Section 10.5 of the ER as follows:

Dún Laoghaire-Rathdown County Council is responsible for collating existing relevant monitored data, the on-going review of environmental targets and indicators, the preparation of preliminary and final monitoring evaluation reports, the publication of these reports and, if necessary, the carrying out of corrective action.

- E) To add baseline data regarding air and noise to Section 3 of the ER from the following reports:
 - EIS for proposed mixed use development Sept. 2005
 - Sandyford Industrial Estate Link Road Feb 2005
 - EIS for a proposed mixed use development on the former Aldi Site, September 2004
 - Upgrade to the M50 EIS Volume 4, September 2004

Two submissions made while Proposed Amendments and accompanying environmental

⁹ These submissions were those made by:

- The Stillorgan District, Community and Residents Alliance; and,
- Environmental Protection Agency.

assessment referred directly to the assessment and provided general information on SEA procedural requirements, including the need to produce an SEA Statement at the end of the process. Although the submissions did not necessitate any changes to be made to documentation, the information contained in the submissions with regard to procedural requirements was considered throughout the remainder of the process.

3.4 Environmental Report

The Environmental Report and the Proposed Variation were placed on public display in January 2011.

Addendum I to the Environmental Report (which details responses to the submissions on the Environmental Report which were made during the period of public display of the Proposed Variation and the Environmental Report) accompanied the Manager's Report circulated to Elected Members. Addendum I proposed updates to the Environmental Report as a result of submissions, as appropriate. Proposed Material Alterations to the Proposed Variation were evaluated for their environmental consequences in а second addendum (Addendum II). Addendum II was integrated into the Proposed Material Alterations document and placed on display in May 2011. Addendum III to the Environmental Report (which details responses to the submissions on the SEA including the environmental assessment which was integrated into the Proposed Material Alterations document - which were made during the period of public display of the Proposed Material Alterations document) accompanied the Manager's Report circulated to the Elected Members in August 2011.

On adoption of the Variation, the Addenda were used to update the original Environmental Report into a final Environmental Report which is available alongside the adopted Variation.

At each stage of the process the Elected Members took into account the findings of the Environmental Report and/or the Addenda as appropriate.

Section 4 Alternatives and the Proposed Variation

4.1 Introduction

This section summarises the alternative scenarios for the Variation, the evaluation of these scenarios and the reasons for choosing the Variation, as adopted, in the light of the other reasonable alternatives dealt with.

4.2 Description of the Alternative Scenarios

The environmental consequences of 3 scenarios for the Variation were examined.

4.2.1 Alternative Scenario 1: *Do Nothing (Retention of Current CDP Provisions)*

Alternative Scenario 1: *Do Nothing* (see Figure 4.1) involves the retention of the current Dún Laoghaire-Rathdown County Development Plan (CDP) 2010-2016 provisions. There is a requirement in the CDP to prepare an Urban Framework Plan for Sandyford however there is no requirement to vary the CDP to include such a Plan, therefore this is a realistic alternative.

The current CDP generally provides for an E-Zoning Objective - 'To provide for economic development and employment' - across the Variation lands, including the Sandyford Business Estate.

The CDP also provides for smaller areas of 'A' Zoning - 'To protect and/or improve residential amenity' - and 'F' Zoning - 'To preserve and provide for open space with ancillary active recreational amenities' - at the Variation lands.

4.2.2 Alternative Scenario 2: Draft Sandyford Urban Framework Plan 2007

Alternative Scenario 2: *Draft Sandyford Urban Framework Plan 2007* (see Figure 4.2) involves the making of a Variation to the County Development Plan which consists of a Draft Sandyford Urban Framework Plan which was prepared in July 2007.

The 2007 Draft Urban Framework Plan provides for edge/peripheral development which is significantly greater than Scenarios 1 or 3, and:

- Identifies central focal points (hearts) in order to achieve a sense of place;
- Incorporates existing permitted and constructed development;
- Seeks to enhance the overall physical environment of the Sandyford Business Estate:
- Seeks to achieve an urban form and improve the legibility of the Sandyford Business Estate; and,
- Provides for planned public open space.

The 2007 Urban Framework Plan includes an approach to building height with central areas having a benchmark height of 8 storeys (with 1 additional storey of occupied roof space) and other areas having a benchmark height of 6 storeys (with 1 additional storey of occupied roof space). Along the edges of the scenario area and along streets within, building height is either 8 storeys (with 2 additional storeys of occupied roof space) or 6 storeys (with 1 additional storey of occupied roof space). This scenario includes:

- 1 central regional landmark building up to 32 storeys;
- 5 district landmark buildings up to 24 storeys;
- 9 district landmark buildings up to 18 storeys; and,
- 11 local landmark buildings up to 14 storeys.

4.2.3 Alternative Scenario 3: Centred Development (Variation No. 2 [Sandyford Urban Framework Plan])

Alternative Scenario 3: Centred Development (see Figure 4.3) provides for the direction of the greatest extent of development towards the centre of the existing built up Sandyford Business Estate, in close proximity to the area's Luas transport node. It identifies a quantum of development for the Sandyford area having regard to potential infrastructure constraints, the

realistic capacity to address these constraints and the likely costs associated with same. Particular attention is given to the areas of transport infrastructure, water and drainage services, social infrastructure, (including educational facilities) and recreation/amenity facilities.

Scenario 3 provides a relatively fine-grain analysis and guidance on densities, plot ratios and quantum of development to be accommodated into the future on a site-by-site basis.

This Scenario proposes building height limits that have been established through an assessment of location and character of an area and proposed land use. The proposed building height limit generally ranges from 6 storeys to 3 storeys along Blackthorn Avenue and within the centre of the Plan area, with a limit of 9 storeys proposed for one plot within the centre and heights up to 17 stories proposed for other plots. Proposed height limits along the edges of the Plan area generally range from 2 to 3 storeys. The scenario allows for the design of buildings or elements of buildings to exceed the building height limit at one location.

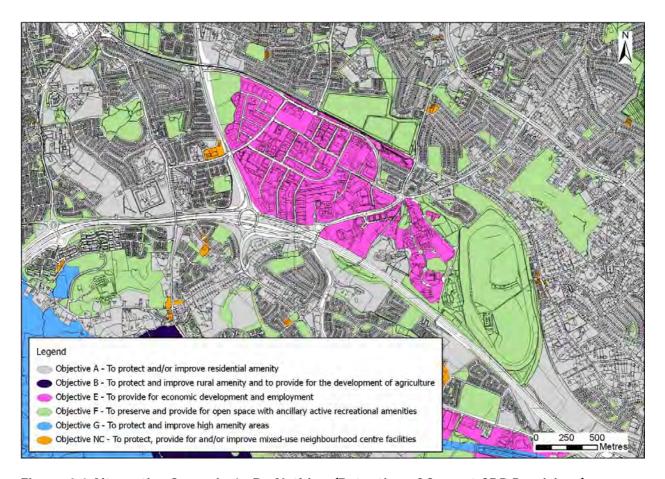


Figure 4.1 Alternative Scenario 1: Do Nothing (Retention of Current CDP Provisions)

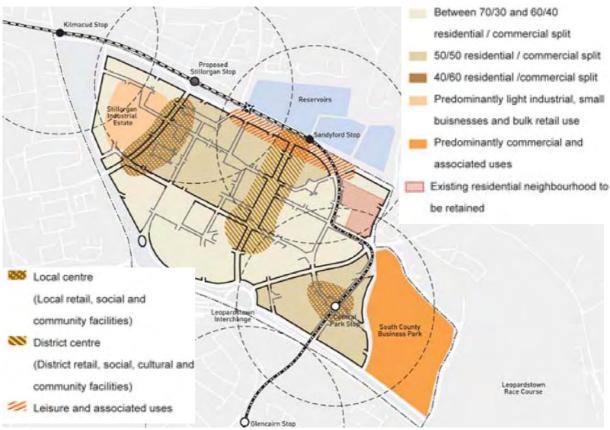


Figure 4.2 Alternative Scenario 2: Draft Sandyford Urban Framework Plan 2007

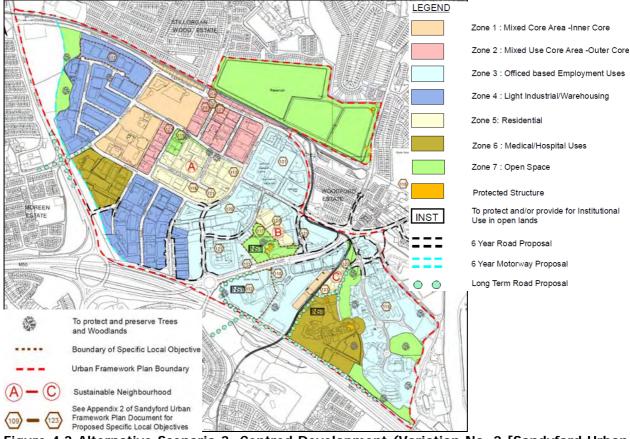


Figure 4.3 Alternative Scenario 3: Centred Development (Variation No. 2 [Sandyford Urban Framework Plan])

4.3 Evaluation of the Alternative Scenarios

4.3.1 Methodology

This section summarises the evaluation of the Alternative Scenarios which is found in Section 7 of the Environmental Report. Scenarios are evaluated in a succinct and focused way for both planning and environmental impacts against both the existing environment - using, inter alia, the maps shown on Figure 2.1 to Figure 2.3 - and Strategic Environmental Objectives (methodological measures which are developed from international, national and regional policies which generally govern environmental protection objectives and against which the environmental effects of the Variation and the alternatives can be tested).

4.3.2 Alternative Scenario 1: *Do Nothing (Retention of Current CDP Provisions)*

4.3.2.1 Environmental Effects

Smarter Travel Effects

The current CDP generally provides for an E-Zoning Objective - 'To provide for economic development and employment' - across the Variation lands, new developments will be located within this area, subject to market demand. Sites around the edge of the E-Zoned area would be more likely to be developed as there would be no specific direction within this area and development would be market-led. Also, the assessment of individual planning applications on a site by site basis would be likely to lead to an extent of fragmented developments which lack connectivity.

Consequently, maximising the uptake in smarter, more sustainable modes of transport would be significantly less likely to be achieved than would be the case under Scenario 3 *Centred Development*. Maximising this uptake would contribute towards the protection of human health (air and noise) and help to minimise:

- energy usage for transport;
- travel related emissions to air; and.
- increases in car dependency.

Positive effects would occur nonetheless, to an extent; some of the new development in Sandyford could better utilise sustainable transport modes than development located within the more rural parts of the County or in other suburbs.

Water and Drainage Services Effects

Unlike Scenario 3, Scenario 1 would not provide for the consideration of infrastructural capacity needs for the Sandyford area as a whole with capacity needs being considered on an application by application basis therefore making the occurrence of capacity exceedences or deficiencies more likely.

Any exceedences in abstractions of water which would compromise the ability of water bodies to meet legislative requirements and any exceedences in water services and drainage infrastructure capacity could affect water resources and biodiversity and flora and fauna beyond the Variation lands.

Local Habitats, Open Space and Existing Residential Areas

There would be potential for adverse effects on local habitats however an amount of protection would be provided through the F Zoning Objective - 'To preserve and provide for open space with ancillary active recreational amenities' - which applies to most of such areas.

Existing residential and open space areas would be likely to largely remain unchanged due to the application of A Zoning - 'To protect and/or improve residential amenity' - and F Zoning - 'To preserve and provide for open space with ancillary active recreational amenities' at these lands. Depending on the height of new buildings which are developed, residential amenity could be impacted upon.

Other Effects

The construction of individual/multiple developments has the potential to give rise to significant adverse effects on architectural heritage, archaeological heritage, water resources and human health (air and noise) within or adjacent to the Variation lands.

4.3.2.2 Planning Effects

Pro's

 General E-Zoning: 'To provide for economic development and employment', will remain on the majority of the lands within the Sandyford Business Estates.

Constraints

- No consideration or assessment of the transboundary effects of individual or groups of projects within the Sandyford Business Estate on the rest of the County in terms of environmental impacts arising from the development of individual or groups of sites as well as economic, social and infrastructural impacts.
- No current or future quantum of development calculated making it difficult to plan for the provision of infrastructure, especially social infrastructure (open space, education facilities etc.) - development is therefore not planned in tandem with vital infrastructure.
- Development would be market/developer led and not plan led.
- No vision or clarity with regard to a future goal for the development of the Sandyford Business Estates, which leads to an uncertain future and in turn, a lack of market confidence in the area. This may discourage future investment in the Sandyford Business Estates.
- No guidance with regard to the scale and form of future development.
- Development will continue to be assessed on a site by site basis, leading to isolated fragmented developments which lack connectivity and fail to provide a clear legible urban structure.

4.3.3 Alternative Scenario 2: Draft Sandyford Urban Framework Plan 2007

4.3.3.1 Environmental Effects

Smarter Travel Effects

This Scenario provides for edge/peripheral development which is significantly greater than Scenarios 1 and 3. Led by the market, the peripheral sites, away from public transport

nodes, would be likely to be developed. Trip generation by private car would be likely to increase, placing more strain on existing road infrastructure including the M50 Motorway. Consequently, maximising the uptake in smarter, more sustainable modes of transport would be significantly less likely to be achieved than would be the case under Scenario 3 *Centred Development*. Maximising this uptake would contribute towards the protection of human health (air and noise) and help to minimise:

- energy usage for transport;
- travel related emissions to air; and,
- increases in car dependency.

Positive effects would occur nonetheless, as other provisions of this Scenario seek to enhance the physical environment of the Business Estate for cyclists and pedestrians as well as improving the legibility of the Estate and incorporating permitted and constructed development. Arising from this, the scenario could contribute towards efforts to maximising the uptake in smarter, more sustainable modes of transport and associated effects.

Water and Drainage Services Effects

Unlike Scenario 3, Scenario 2 would not provide for the consideration of infrastructural capacity needs for the Sandyford area as a whole with capacity needs being considered on an application by application basis therefore making the occurrence of capacity exceedences or deficiencies more likely.

Any exceedences in abstractions of water which would compromise the ability of water bodies to meet legislative requirements and any exceedences in water services and drainage infrastructure capacity could affect water resources and biodiversity and flora and fauna beyond the Variation lands.

Local Habitats, Open Space and Existing Residential Areas

Under this Scenario, along the edges of the Variation area and along streets within, building height is either 8 storeys (with 2 additional storeys of occupied roof space) or 6 storeys (with 1 additional storey of occupied roof space) while a number of landmark buildings are provided for, the largest of which is to 32 storeys. This approach to building height would

be likely to result in adverse residual impacts upon residential amenity within and adjacent to the Variation lands. The approach would also be likely to affect the skyline of the wider City.

This scenario would provide for planned public open space although new development at the periphery of the Variation area would have the potential to adversely affect local habitats and result in losses to open space.

4.3.3.2 Planning Effects

Pro's

- The Plan is specific to the area.
- Presents a vision for the future development of the area therefore providing certainty and market confidence in the future of the Sandyford Business Estates.
- Identifies central focal points (hearts) in order to achieve a sense of place.
- Existing permitted and constructed development has been incorporated into the Plan.
- Seeks to enhance the overall physical environment of the Sandyford Business Estate for residents, workers, visitors, cyclists and pedestrians.
- Seeks to achieve an urban form and improve the legibility of the Sandyford Business Estate.
- Provides for planned public open space.

Constraints -

- No consideration or assessment of the transboundary effects of individual or groups of projects within the Sandyford Business Estate on the rest of the County in terms of environmental impacts arising from the development of individual or groups of sites as well as economic, social and infrastructural impacts.
- No current or future quantum of development calculated making it difficult to plan for the provision of infrastructure especially social infrastructure (open space, education facilities etc.).
- No existing infrastructural constraints assessment or assessment of future infrastructural needs.
- Details of the plan are not site specific and would be difficult to implement at Development Management Stage.

- No clear rational with regard to the proposed layout of the plan area.
- No definition with regard to meaning of 'mixed use' development or 'commercial' development. Proposed vision may result in the over dilution of the industrial function of the Sandyford Business Estate.
- Open space identified does not address the issue of deliverability.

4.3.4 Alternative Scenario 3: Centred Development (Variation No. 2 [Sandyford Urban Framework Plan])

4.3.4.1 Environmental Effects

Smarter Travel Effects

This scenario provides for the direction of the greatest proportion of development towards the centre of the existing built up Sandyford Business Estate, in close proximity to the area's Luas transport node. The Luas line currently serves populations between Sandyford and St. Stephen's Green in the city centre and is being extended to serve populations between Sandyford and Cherrywood/Bride's Glen.

This Scenario also seeks to enhance the physical environment of the Business Estate for cyclists and pedestrians as well as improving the legibility of the Estate and incorporating permitted and constructed development.

Consequently, this Scenario would be likely to on both a local and county level - contribute towards and significantly beneficially affect:

- the achievement of a modal change towards smarter travel:
- increasing the proportion of the population travelling by public transport or cycling or walking;
- avoiding unnecessary use of the capacity of the M50 Motorway;
- minimising energy usage for transport;
- minimising travel related emissions to air.
- reducing increases in car dependency; and,
- protecting human health (air and noise).

Water and Drainage Services Effects

Scenario 3 would provide for the consideration of infrastructural capacity needs for the Sandyford area as a whole therefore making the occurrence of capacity exceedences or deficiencies less likely.

Any exceedences in abstractions of water which would compromise the ability of water bodies to meet legislative requirements and any exceedences in water services and drainage infrastructure capacity could affect water resources and biodiversity and flora and fauna beyond the Variation lands. However, such exceedences would be least likely under this Scenario.

Local Habitats, Open Space and Existing Residential Areas

This scenario would contribute towards the protection of residential amenity by:

- Directing most development towards the existing built up Sandyford Business Estate and towards the centre of this area; and.
- Proposing building height limits that have been established through an assessment of location, character and proposed land use, with limits along the edges of the Plan area generally ranging from 2 to 3 storeys.

This scenario preserves a route corridor for the Dublin Eastern Bypass in the north west of the Variation area at the parklands at St. Benildus. Development of the Bypass through the corridor would lead to a significant loss of open space.

This scenario positively impacts upon the provision of open space by zoning Central Park and the Burton Hall Campus as Open Space; these locations would be zoned under Scenario 1 - *Do Nothing (Retention of Current CDP Provisions)* with objectives that could be more likely to favour new built development.

Local habitats would be generally protected under this Scenario through:

 the direction of the greatest extent of development towards sites within – and closest to the centre of - the existing, built up Sandyford Business Estate area; and, the application of Open Space zoning objectives and local habitat protection objectives.

Other Effects

The construction of individual/multiple developments has the potential to give rise to significant adverse effects on architectural heritage, archaeological heritage, water resources and human health (air and noise) within or adjacent to the Variation lands.

4.3.4.2 Planning Effects

Pro's

- The plan accords with National and Regional policies and guidelines.
- The plan accords with the hierarchies set out in the County Development Plan.
- The plan takes cognisance of the setting of the area and the existing built form.
- The plan provides clarity on the future form and role of the area.
- The plan provides clear policies and objectives on land uses that are specific to the future growth of the area
- The plan has been informed by detailed studies of infrastructure capacities so as to ensure that the area has the capacity to carry the level of development proposed.
- The infrastructure being proposed has been identified having taken into consideration best return for investment.
- The plan provides clear policies and objectives in regard to the future density of developments
- The plan provides clear policies and objectives on building height
- The phasing in the plan ensures the delivery of infrastructure in tandem with development
- The plan accords with the policies of sustainable development and provides for the coherent development of the area.
- The plan is based on a clear rationale that facilitates the review of the plan and its implementation.

Constraints

 The phasing of the plan will require cooperation from a number of landowners so as to be efficiently implemented.

4.4 Reasons for choosing the Variation in light of the other reasonable alternatives dealt with

The Alternatives that were examined were produced and evaluated at an earlier - more embryonic - stage to facilitate the evaluation and selection of a plan - having regard, *inter alia* to environmental consequences.

The Alternative Scenario for the Variation which emerged from the Variation preparation process is Scenario 3 – this Scenario contributes towards the protection of the environment and conforms with high level planning objectives.

Alternative Scenario 3 was chosen to be developed for the Variation by the planning team and put on public display and adopted by the Elected Members having regard to both:

- The environmental effects which were identified by the Strategic Environmental Assessment; and
- 2. Planning including social and economic effects.

By complying with appropriate mitigation measures - including those which have been integrated into the Variation and those which are already in force through the existing County Development Plan - potential adverse environmental effects which could arise as a result of implementing this scenario would be likely to be avoided, reduced or offset.

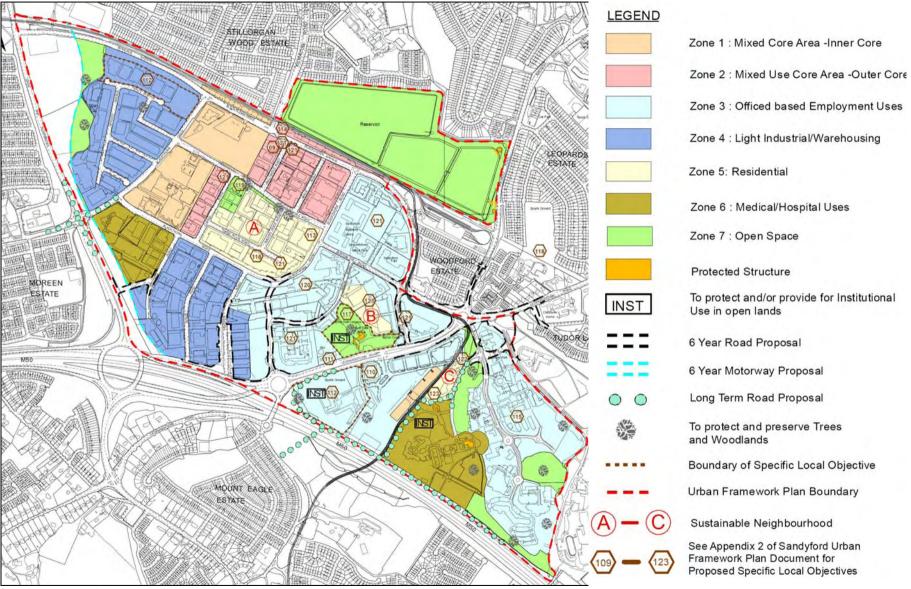


Figure 4.4 Variation Land Use Zoning Objectives Map

Section 5 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 and Section 10 of the Environmental Report detail the measures which will be used in order to monitor the likely significant effects of implementing the Variation.

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 Variation of the County Development Plan (CDP) is achieving environmental objectives and targets - measures which the Variation can help work towards - whether these need to be reexamined and whether the proposed mitigation measures are being implemented.

5.2 Indicators and Targets

Monitoring is based around the indicators which were chosen earlier in the process. These indicators allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives used in the evaluation. Focus is given to indicators which are relevant to the likely significant environmental effects of implementing the Variation and existing monitoring arrangements will be used in order to monitor the selected indicators. Each indicator to be monitored is accompanied by the target(s) which were identified with regard to the relevant legislation.

Table 5.1 shows the indicators and targets which have been selected with regard to the monitoring of the Variation. The indicators used are either the same or similar to those which are being used for monitoring the existing CDP.

5.3 Sources

Measurements for indicators generally come from existing monitoring sources. Existing monitoring sources exist for each of the indicators and include those maintained by Dún Laoghaire-Rathdown County Council and the relevant authorities e.g. the Environmental Protection Agency, the National Parks and Wildlife Service and the Central Statistics Office.

The *Development Management Process* in Dún Laoghaire-Rathdown County Council will provide passive monitoring of various indicators and targets on an application by application basis. Where significant adverse effects - including positive, negative, cumulative and indirect - are likely to occur upon, for example, entries to the RMP, entries to the RPS or ecological networks as a result of the undertaking of individual projects or multiple individual projects such instances should be identified and recorded and should feed into the monitoring evaluation.

5.4 Reporting

A preliminary monitoring evaluation report on the effects of implementing the CDP is to be prepared to coincide with the Manager's report to the elected members on the progress achieved in securing CDP objectives within two years of the making of the plan (this Manager's report is required under section 15 of the 2000 Planning Act).

This report should address the indicators set out below for the Sandyford Urban Framework Plan area to which the Variation relates.

5.5 Responsibility

Dún Laoghaire-Rathdown County Council is responsible for collating existing relevant monitored data, the on-going review of environmental targets and indicators, the preparation of preliminary and final monitoring evaluation reports, the publication of these reports and, if necessary, the carrying out of corrective action.

The CDP SEA recommended that a Steering Committee be established within the Council to oversee the monitoring process. This Steering Committee should also oversee the monitoring in this section.

5.6 Thresholds

Thresholds at which corrective action will be considered include:

- The occurrence of flood events;
- Court cases taken by the Department of Arts, Heritage and the Gaeltacht (DAHG) regarding impacts upon archaeological heritage including entries to the Record of Monuments and Places; and,

Complaints received from statutory consultees regarding avoidable environmental impacts resulting from development which is granted permission under the County Development Plan as varied.

Environmental Component	Selected Indicator(s)	Selected Target(s)	Source	Monitoring Frequency
Biodiversity, Flora and Fauna	B1: Conservation status of habitats and species as assessed under Article 17 of the Habitats Directive	B1: Maintenance of favourable conservation status for all habitats and species protected under national and international legislation	a) DAHG report of the implementation of the measures contained in the Habitats Directive - as required by Article 17 of the Directive; and, b) Consultations with the NPWS.	a) Every 6 years b) At preliminary monitoring evaluation - see Section 5.4
	B2: Percentage loss of functional connectivity to corridors and areas of habitat which are important at the local Sandyford level without remediation as a result of implementation of the Variation	B2: No significant corridors and areas of habitat or parts thereof which are important at the local Sandyford level and which provide functional connectivity to be lost without remediation as a result of implementation of Variation	a) CORINE mapping resurvey b) Development Management Process in the Council	a) Unknown b) Per granted permission; compile at preliminary monitoring evaluation - see Section 5.4
Population and Human Health	HH1: Occurrence (any) of a spatially concentrated deterioration in human health arising from environmental factors as identified by the Health Service Executive and Environmental Protection Agency	HH1: No spatial concentrations of health problems arising from environmental factors as a result of implementing the Variation	Consultations with EPA and Health Service Executive	At preliminary monitoring evaluation - see Section 5.4
Soil	S1: Area of brownfield lands developed at the Variation lands over the lifespan of the County Development Plan	S1: Arising from increased levels of brownfield development, a reduced availability of brownfield land at the Variation lands (subject to availability on the open market, the demand for such land and the ability for such lands to be sustainably reused) at the end of the County Development Plan's lifespan	Development Management Process in the Council	Per granted permission; compile at preliminary monitoring evaluation - see Section 5.4

Environmental Component	Selected Indicator(s)	Selected Target(s)	Sources	Monitoring Frequency
Water	W1: Classification of Overall Status (comprised of ecological and chemical status) under the European Communities Environmental Objectives (Surface Waters) Regulations 2009 (SI No. 272 of 2009)	W1: To achieve 'good status' in all bodies of surface waters by 2015 and to not knowingly allow deterioration in the status of any surface water	Data issued under the Water Framework Directive Monitoring Programme for Ireland (EPA, 2006)	Unknown
	W2: Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	W2: Compliance with Groundwater Quality Standards and Threshold Values under Directive 2006/118/EC	Data issued under the Water Framework Directive Monitoring Programme for Ireland (EPA, 2006)	Unknown
	W3: Number of incompatible developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk	W3: Minimise developments granted permission on lands which pose - or are likely to pose in the future - a significant flood risk in compliance with The Planning System and Flood Risk Management Guidelines for Planning Authorities	Development Management Process in the Council	Per granted permission; compile at preliminary monitoring evaluation - see Section 5.4
Material Assets	M1i: Number of new developments granted permission which can be adequately served with waste water treatment over the lifetime of the County Development Plan as varied	M1i: All new developments granted permission to be connected to and adequately served by waste water treatment over the lifetime of the County Development Plan as varied	Development Management Process in the Council	Per granted permission; compile at preliminary monitoring evaluation - see Section 5.4
	M1ii: Preparation of a Water Services Strategic Plan - in compliance with the Water Services Act - for the functional area of the Council, which includes the Variation lands	M1ii: For the Council to prepare a Water Services Strategic Plan in compliance with the Water Services Act	Dún Laoghaire- Rathdown County Council	Detail status of Plan preparation at preliminary monitoring evaluation - see Section 5.4

Environmental Component	Selected Indicator(s)	Selected Target(s)	Sources	Monitoring Frequency
Material Assets cont.	M2i: Number of non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health	M2i: No non-compliances with the 48 parameters identified in the European Communities (Drinking Water) Regulations (No. 2) 2007 which present a potential danger to human health as a result of implementing the Plan	a) EPA The Provision and Quality of Drinking Water in Ireland reports (EPA); b) EPA Remedial Action List; and, c) Dún Laoghaire-Rathdown County Council.	a) Annual/biannual; b) Annual/biannual; c) Council's Water and Waste Services Department to confirm - as appropriate - status of supplies listed on Remedial Action List.
	M2ii ¹⁰ : Preparation of a Water Services Strategic Plan - in compliance with the Water Services Act - for the functional area of the Council, which includes the Variation lands	M2ii: For the Council to prepare a Water Services Strategic Plan in compliance with the Water Services Act	Dún Laoghaire- Rathdown County Council	Detail status of Plan preparation at preliminary monitoring evaluation - see Section 5.4
Air and Climatic Factors	C1: Percentage of population working within the Variation lands travelling to work by public transport or non-mechanical means	C1: An increase in the percentage of the population travelling to work by public transport or non-mechanical means	Central Statistics Office	Next Census 2011
Cultural Heritage	CH1: Percentage of entries to the Record of Monuments and Places - including Zones of Archaeological Potential - (and their context of the above within the surrounding landscape where relevant) protected	CH1: Protect entries to the Record of Monuments and Places - including Zones of Archaeological Potential - (and their context of the above within the surrounding landscape where relevant)	a) Development Management/ Enforcement Processes in the Council; and, b) Consultation with DAHG.	a) Per granted permission/ enforcement action; compile at preliminary monitoring evaluation - see Section 5.4 b) Compile at preliminary monitoring evaluation - see Section 5.4
	CH2i: Percentage of entries to the Record of Protected Structures (and/or their context within the surrounding landscape where relevant) protected	CH2i: Protect entries to the Record of Protected Structures (and/or their context within the surrounding landscape where relevant)	a) Development Management/ Enforcement Processes in the Council; and, b) Consultation with DAHG.	a) Per granted permission/ enforcement action; compile at preliminary monitoring evaluation - see Section 5.4 b) Compile at preliminary monitoring evaluation - see Section 5.4

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 $^{^{\}rm 10}$ Indicator and Target M2i are the same as Indicator and Target M1

Environmental Component	Selected Indicator(s)	Selected Target(s)	Sources	Monitoring Frequency
Cultural Heritage cont.	CH2ii: Number of additions to the Record of Protected Structures and the number of additional ACAs	CH2ii: Make Additions to the Record of Protected Structures and make additional ACAs, where appropriate	Dún Laoghaire- Rathdown County Council	Compile at preliminary monitoring evaluation - see Section 5.4
Landscape	L1: Number of avoidable significant adverse impacts on the views and amenity of existing developments within and adjacent to the Variation lands	L1: No developments permitted which result in avoidable impacts on the landscape resulting from development which is granted permission under the County Development Plan as varied	a) Development Management Process in the Council; and, b) Consultation with DAHG.	a) Per granted permission; compile at preliminary monitoring evaluation - see Section 5.4 b) Compile at preliminary monitoring evaluation - see Section 5.4

Table 5.1 Selected Indicators, Targets and Monitoring Sources