

SEA Statement

Youghal Development Plan 2009 - 2015

1.0 Introduction

In accordance with Article 7 of the Planning & Development Regulations 2004, section 13(I), this report consists of an SEA Statement in relation to the Youghal 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 Youghal 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 Youghal Development Plan, RPS Consultants 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 Cork County Council and Youghal Town Council that were involved in the drafting of the Youghal Development Plan 2009 - 2015, the SEA team and a number of specialists who 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 Youghal 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 migratory 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 Youghal 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 Youghal Development Plan as set out in Volume III of the Plan related mainly to biodiversity, human health (air and noise), soils and Geology, water and landscape as set out in table 1 below.

Where significant effects had been identified and had not been mitigated sufficiently by policies and objectives within the draft Plan, additional mitigation measures were recommended in Chapter 8 of the environmental report and have been incorporated where possible into the Plan. Table 1 of 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. An appropriate assessment of the draft Plan was also carried out and all proposed mitigation measures as set out in the appropriate assessment have been incorporated into the Adopted Plan. Overall it is considered that the proposed draft Plan would not have a negative impact on the environment.

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 9 of the Environmental Report sets out the monitoring proposals that will be undertaken following implementation of the policies and objectives of the Youghal Development Plan (these are also linked with significant effects and mitigation measures in Table 1 below).

Table 1: Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Youghal Development Plan Environmental Report

Trends and Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in Monitoring Table 12 Vol III of Plan)
Biodiversity			
<p>The Blackwater River and estuary SAC/SPA/NHA adjoins Youghal Town to the east. This area is listed in Annex I habitat under the E.U habitats directive and therefore are of international ecological importance. In addition the River Tourig contains marine habitats including saltmarshes and intertidal mudflats that are listed as Annex I species on the E.U. habitats directive.</p>	<p>Not significant due to implementation of mitigation measures in Plan</p>	<p>SEA Recommended Policy:</p> <p>To maintain the conservation value of Blackwater River and estuary SAC/SPA/NHA and the Ballyvergan Marsh NHA adjoining the town during the lifetime of this plan and to ensure Appropriate Assessment is carried out where development projects are likely to have significant effects on this European site, whether within or outside the boundary of the European Site, in accordance with Articles 6(3) and 6(4) of the EU Habitats Directive (92/43/EEC) and Department of the Environment, Heritage and Local Government Circular Letter (SEA 1/08 & NPWS 1/08).</p> <p>Policy addressed in section 5.1 of the Adopted Plan (p. 62)</p>	<p>Refer to Monitoring Programme As Indicated In Table 12:</p> <ul style="list-style-type: none"> • Biodiversity • Soil • Water
	<p>Not significant due to implementation of mitigation measures in Plan</p>	<p>SEA Recommended Policy:</p> <p>To undertake environmental appraisals or Environmental Impact Assessments and Appropriate Assessments in areas within or likely to affect pNHA's, cSAC's and SPAs; i.e. new roads and other infrastructure, other major developments, etc in accordance with Articles 6(3) and 6(4) of the EU Habitats Directive (92/43/EEC) and Department of the Environment, Heritage and Local Government Circular Letter (SEA 1/08 & NPWS 1/08).</p> <p>Policy addressed in section 5.1 of the Adopted Plan (p. 62)</p>	<p>Refer to Monitoring Programme As Indicated In Table 12:</p> <ul style="list-style-type: none"> • Biodiversity
	<p>Not significant</p>	<p>SEA Recommended Policy:</p> <p>To use Brownfield sites in preference to Greenfield sites in accordance with the draft Sustainable Residential Development in Urban Areas 2008.</p> <p>Policy addressed in section 5.1 of the Adopted Plan (p. 62)</p>	<p>Refer to Monitoring Programme As Indicated In Table 12:</p> <ul style="list-style-type: none"> • Soil

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Human Health (Air & Noise)			
Actively planning for development of an area is likely to have the effect of attracting more people to the area, through the introduction of residential areas, tourist attractions and improvements and via commercial activity in this case. Consequently, an increase in the population of the area is likely to lend itself to increased traffic volumes, pressure on wastewater and water resources. All of these pressures have an environmental consequence, and some have human health consequences, namely changes in air quality and the noise environment.	Not significant due to implementation of mitigation measures in Plan	<p>All developments should comply with national noise and vibration standards and the objectives of the Climate Change Strategy 2007-2013.</p> <p>Policy addressed in section 5.1 of the Adopted Plan (p. 62)</p> <p>The SEA recommends inclusion of a development control objective for the requirements of SI. No. 140 of 2006, Environmental Noise Regulations, outlining that the NRA require planning applications where developments are proposed in areas within the area of influence of existing national or planned new roads and to identify and implement noise mitigation measures, where the additional traffic generated by the development results in a breach of the noise design goals on national roads for sensitive receptors exposed to road noise traffic. The costs of implementing mitigation measures shall be borne by the developer, as the authority will not be responsible for the provision of additional noise mitigation. This issue is of particular concern to lands zoned Enterprise/Industrial in the west Youghal environs.</p> <p>Policy addressed in section 5.1 of the Adopted Plan (p. 63)</p>	<p>Refer to Monitoring Programme As Indicated In Table 12:</p> <ul style="list-style-type: none"> • Human Health
Soils and Geology			
Impact on Soils as a result of high groundwater vulnerability	Not significant due to implementation of mitigation measures in Plan	<p>Promote compliance with the Soils Directive and the implementation of the policies and objectives of the Soils Directive.</p> <p>Policy addressed in section 5.1 of the Adopted Plan (p. 63)</p>	<p>Refer to Monitoring Programme As Indicated In Table 12:</p> <ul style="list-style-type: none"> • Biodiversity • Soil • Water
Water			
Currently there is declining water quality of the Blackwater Estuary due to the need for	Not significant	SEA recommends the inclusion of a policy for the promotion of Sustainable Urban Drainage Measures in new developments.	Refer to Monitoring Programme As Indicated In

Table 1: Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Youghal Development Plan Environmental Report

Trends and Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in Monitoring Table 12 Vol III of Plan)
a Wastewater treatment plant.		The Plan includes policies addressing drainage issues including Surface water management objectives (p.62) and in section 6.5, which refers to Drainage.	Table 12: • Water
Landscape			
Impact on Landscape within the Town	Not significant	<p>Applications for development on the A47 scenic route will have to demonstrate through a detailed landscape and visual assessment that they do not have a negative impact on the amenity and views in this area.</p> <p>This is already a Policy of the Cork County Development Plan and therefore no change is proposed in Youghal Plan.</p>	Refer to Monitoring Programme As Indicated In Table 12: • Landscape
	Not significant	<p>Development should be restricted on exposed slopes of the town. Any development proposals on these steep slopes should require a visual impact assessment.</p> <p>Ensure that landform, planting and sympathetic detailed design is undertaken to reduce negative visual impacts and assist in compensating for the loss of the landscape resource; and</p> <p>Attention to phasing and development of the landscape design should be integral to the design process.</p> <p>The Plan provides adequate protection to scenic views and surrounding landscape of Youghal in section 4.7 and 4.8 of the Plan.</p>	

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.

SEA Scoping Consultations

Strategic Environmental Assessment scoping letters were sent to the Department of the Environment, Heritage and Local Government (DEHLG), Department of Communications, Marine and Natural Resources (DCMNR) and Environmental Protection Agency (EPA). Waterford County Council, which neighbours Youghal Town Council, was also consulted at this stage. All responses were received in August 2007 and were taken into account during the carrying out of the Strategic Environmental Assessment and the preparation of the Environmental Report on the draft Youghal Development Plan.

Submissions and Observations after Public Display Periods

The SEA team responded to submissions and observations made after the various public display periods. Changes to the Plan or Environmental Report were advised and made where necessary. Any changes necessitated as a result of the submissions received were reviewed by the SEA team and have been incorporated where appropriate into the Amendments to the Plan and documented in the various Environmental and Manager's Reports produced during the preparation of the Plan.

The EPA, as one of the environmental authorities included in the SEA process was not consulted with during the public display periods, however they were consulted with in October 2008. The EPA responded to this consultation in November 2008 and all comments were taken into consideration and documented in Appendix 1 attached to this statement. The submissions thus influenced the preparation of the Proposed Amendments and ultimately the final decisions on the 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. As part of this 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 'Intensify the existing Town Centre'; and an alternative to 'Extend new development zonings on Greenfield lands'.

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 allow the intensification of existing Town Centre which would allow the town to develop in a compact and sustainable manner and allow a gradual expansion of the town centre north and eastwards. It was considered that this general strategy would encourage the rejuvenation of the town's economy and help to develop the town's tourist function and would also be likely to have a positive impact on existing residents and traders in the town centre area in accordance with the general goals of the Plan. Accordingly this alternative is reflected in the Youghal Development Plan's overall strategy which sets out that 'It shall be an objective of the Plan to maintain the old town centre as the primary commercial, retail, civic, social and symbolic centre of the town and to maintain the dynamic of its mix of uses while recognising the unique historical and heritage character of the area and also recognising that certain modern uses, due to either their scale or infrastructural requirements may no longer be appropriate to the town centre.' It is also reflected in the general strategy and zoning objectives of the Plan In addition whereby a 'logical progression and expansion of the town eastwards towards the Sea' is proposed.

6.0 Monitoring measures

The SEA Directive requires that the significant environmental effects of the implementation of plans are 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 9 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 Youghal Development Plan (these are also linked with significant effects and mitigation measures in Table 1 above). Table 12 of the environmental report sets out specific

environmental potential impacts and indicators and targets to allow monitoring of the quantitative trends and progress over time relating to the significant impacts.

Youghal Town Council is responsible to monitor the significant environmental effects arising from the implementation of the Youghal 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 may be directly relevant in terms of future monitoring for the Youghal Development Plan.

Appendix 1: SEA Statement Youghal Development Plan 2009 - 2015
Environmental Protection Agency Submission to draft Youghal Development Plan 2009 - 2015

EPA Issue Raised	Response to Issue Raised	Reference in Plan or other
Recommend documentation of the integration between SEA and Youghal Town Development Plan and inclusion of a table summarising the key findings of the SEA process.	The SEA Statement published with the Plan sets out how the Plan and SEA have been integrated.	Refer to SEA Statement
Water Framework Directive - Recommend incorporation of the measures and objectives set out in the River Basin District (RBD) - River Basin Management Plan (RBMP) and associated Programmes of Measures (POMs) for the South Western River Basin District as appropriate.	This programme/plan was not complete during drafting of Plan. Therefore consideration will be given to same once it is finalised and changes to the plan may take the form of a variation.	
Drinking Water – Recommend that the Plan should implement and include the relevant recommendations set out in The Provision and Quality of Drinking Water in Ireland – A Report for the Years 2006-2007 The Plan should address as a priority the shortfalls in water supply that have occurred in the last number of years.	It is considered that the Plan in section 6.4 has adequately addresses water supply shortfalls and the issues raised in the Provision and Quality of Drinking Water in Ireland – A Report for the Years 2006-2007. As a result, no additional changes are recommended.	Section 6.4, Volume II
Waste Water - Recommends that the relevant recommendations set out in Urban Waste Water Discharges in Ireland for Population Equivalents Greater than 500 persons be included.	As set out in Volume 1 of the Plan a new wastewater treatment plant is proposed which will include the separation of foul and storm water and construction of a new outfall to Youghal Harbour. This is due for completion by 2012, which should adequately address this matter. Therefore no changes are proposed.	Section 6.2 and 6.3, Volume I
Water Conservation – Recommend that the Plan should include measures to promote water conservation. It is recommended that a Water Conservation Strategy be prepared for the area and should address new and existing developments and timescales for same should be assigned. Consideration should also be given to developing a Plan Policy to reduce and manage future water demand.	As set out in Volume 1 of the Plan a pro-active leakage detection and repair program is currently being undertaken under the countywide Water Conservation Program, which will include Youghal Town Council. Therefore this matter is adequately addressed and no change is proposed.	Section 6.2, Volume I

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<p>Groundwater Protection – Recommend that consideration should be given for inclusion of a specific Plan Objective to carry out more detailed mapping of local groundwater vulnerability and that vulnerable areas be protected from inappropriate development. Development of a groundwater protection Plan should be considered.</p>	<p>It is considered that section 5.1 of the Plan adequately addresses the protection of ground water. Furthermore, it is an objective of the Plan that all proposals for development shall have regard for the provisions of Volume III (SEA) of the Plan, which includes a map setting out the Groundwater Vulnerability Youghal Town Council Area in Figure 7, p. 45. Therefore no change is proposed in this respect.</p>	<p>Section 5.1, Volume II SEA, Fig 7, p. 45</p>
<p>Flood prevention and Management – Recommend that consideration should be given to the new Draft Planning Guidelines on Flooding in the Planning System and Flood Risk Management – Consultation draft Guidelines for Planning Authorities (DoEHLG – OPW, Sept 2008).</p> <p>Recommend the inclusion of relevant Policies for Sustainable Urban Drainage Systems (SUDS).</p>	<p>Consideration will be given to the Draft Planning Guidelines on Flooding in the Planning System and Flood Risk Management – Consultation draft Guidelines for Planning Authorities (DoEHLG – OPW, Sept 2008) as a matter of course as part of the development management process. However, given that the document is still at draft stage, once it is finalised, changes to the plan may take the form of a variation.</p> <p>It is considered that section 6.9 of the Plan referring to coastal protection and tidal flooding adequately addresses flooding and section 5.1 adequately covers Surface Water management objectives. Therefore no change is proposed.</p>	<p>Section 6.9 and 5.1, Vol II</p>

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<p>Bathing Water- Refers to the new “Directive on bathing water (Directive 2006/7/EC)” which came into force on 24 March 2006 and which will repeal the existing 1976 Directive with effect from 31 December 2014. The new Directive is implemented in Ireland by the new Bathing Water Quality Regulations 2008 (S.I. No. 79) of 2008 and recommends the inclusion and compliance of the following policy/objectives:</p> <p>“The purpose of the Bathing Water Regulations is the protection of human health”, and the relevant local authorities, where appropriate, “<u>should 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.</u>”</p> <p>“To ensure the protection of local freshwater and seawater areas that are used for bathing.”</p>	<p>It is considered that sections 5.1, 6.5 and 6.9 adequately protect local freshwater and seawater. Furthermore Youghal Town Council is committed to meeting the requirements of the <i>Directive on bathing water</i> (Directive 2006/7/EC) as a matter of course. Therefore no change is proposed.</p>	<p>Section 5.1, 6.5 and 6.9, Vol II</p>
<p>Integration of infrastructure, zoning and development - Recommend that zoning for development should be linked to the availability of water supply/waste water treatment infrastructure and capacity and inclusion of a Policy/Objective for the provision of adequate supply of drinking water during the holiday season.</p>	<p>Please refer to SEA and Critical Infrastructure Planning below.</p>	
<p>Wetland and Habitat Mapping – Recommend that consideration should be given to inclusion of an objective for the phased and co-ordinated programme of habitat and wetland mapping.</p>	<p>Youghal Town Council does not have finances to undertake such a project and therefore this objective is not realistic within the lifetime of the plan. Furthermore Youghal Town Council may otherwise be mapped as part of the County Habitat Mapping Project under the County Heritage Plan and County Biodiversity Plan, which is currently underway</p>	
<p>EU Protected Habitats and Species in Ireland – Recommend that the Plan should include a clear Policy to protect all designated habitats, water bodies and species within the Plan area.</p>	<p>This matter has been adequately addressed in the adopted Plan and all policies and objectives referring to same in the Environmental Report and Appropriate Assessment have been incorporated in the adopted Plan</p>	<p>Refer to Section 5.1 of the Adopted Plan</p>
<p>Appropriate Assessment - The EPA has noted that an Appropriate Assessment has been undertaken on the draft Plan. Recommend the inclusion of recommendations of the Appropriate</p>	<p>This matter has been adequately addressed in the adopted Plan and all policies and objectives referring to same in the Environmental Report and</p>	<p>Refer to Section 5.1 of the Adopted</p>

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<p>Assessment into the draft Plan. Also recommend the inclusion of a table summarising the key findings of the Appropriate Assessment including clarification on how the Appropriate Assessment has influenced the plan. Evidence of its integration into the Plan and SEA should be included within the Plan.</p> <p>Recommend inclusion of a clear policy that sets out a requirement to undertake an Appropriate Assessment for all amendments of the plan, as well as any projects (e.g. Marina developments) within the Plan area, that have the potential to impact on Natura 2000 sites.</p>	<p>Appropriate Assessment have been incorporated in the adopted Plan.</p>	<p>Plan</p>
<p>Recommend inclusion of a policy to encourage the development of brownfield over greenfield sites</p> <p>Recommend inclusion of a policy to protect non-designated habitats and species and should define a minimum 'buffer zone' which should be applied to protect non-designated habitats (including rivers, streams, wetlands, hedgerows and woodlands) and species within the Plan area.</p>	<p>Policy to encourage the development of brownfield over greenfield sites has been adequately addressed in the Plan.</p> <p>While Youghal Town Council duly note the suggestion contained in the submission regarding non-designated habitats and species, no changes are proposed.</p>	<p>Refer to section 5.1 of Plan p. 51</p>
<p>Alien Species and Noxious Weeds – Recommend that consideration should be given to the inclusion of a Plan Policy for the promotion and implementation of measures to control and manage alien/invasive species and noxious weeds.</p>	<p>While Youghal Town Council duly note the suggestion contained in the submission regarding Alien Species and Noxious Weeds, no changes are proposed.</p>	
<p>Landscape - Recommend that consideration should be given to the inclusion of a specific Objective, with relevant timescales, for the preparation of a Landscape Character Assessment and/or Landscape Management Plan for the Plan area.</p> <p>Recommends that consideration should also be given to the requirement for an appropriate "visual impact assessment" for any proposed development with potential to impact adversely on the landscape character of the Plan area and adjoining lands.</p> <p>Recommends that consideration should also be given to inclusion of Policies and Objectives for the management and protection of the shoreline and Ballyvergan Marsh areas within the Plan</p>	<p>While Youghal Town Council duly note the suggestion contained in the submission, it does not have finances to undertake such a project and therefore this objective is not realistic within the lifetime of the plan.</p> <p>It is considered that the draft Cork County Landscape Strategy and sections 4.7 and 4.8 of the Plan adequately addresses landscape provisions.</p>	<p>sections 4.7 and 4.8, Vol II</p>

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<p>area.</p> <p>Recommends that consideration should also be given to inclusion of Policies on Heritage and Conservation and a building height policy should be included in the Plan.</p>		
<p>Marina Development And Tourism – Sets out the need to ensure adequate provisions of services with regard to the Objective to develop marina facilities in Youghal Town. Also recommends that consultation should be undertaken with the National Parks and Wildlife Service (NPWS) with regard to screening for Appropriate Assessment of any proposed marina development that has potential to impact on the River Blackwater and Estuary SAC.</p> <p>Recommend inclusion of Policies and Objectives for the sustainable management of tourism-related activities.</p>	<p>Any application for development at the Marina will be assessed in terms of provisions of services as a matter of course in the development management process.</p> <p>A specific policy has been included in the Plan setting out that any proposed marina development will need to comply with appropriate assessment requirements.</p> <p>Overall it is considered that adequate references have been made to ensure that all developments (tourism included) will comply with the relevant sustainable management tools such as provision of Environmental Impact Assessment and Appropriate Assessment under the provisions of the EU 'EIA Directive' and Article 6 of the EU 'Habitats Directive'.</p>	Vol II
<p>Transportation – Sets out that the <i>Department of Transport 2020 Vision – Sustainable Travel and Transport Public Consultation Document (Feb 2008)</i> should be reviewed in the context of possible initiatives which could be included as Objectives within the Plan.</p> <p>A specific Policy should be included in the Plan for the preparation of an integrated Traffic Management Plan for the Town. This should address the short, medium and long-term traffic needs of the Town.</p>	<p>Youghal Town Council has reviewed the mentioned document and suggested policy inclusion with regard to the Plan and it is considered that sections 6.1 - 6.3, Vol III adequately addresses transportation and therefore no change is proposed.</p>	Sections 6.1 - 6.3, Vol III
<p>Management of Wastes - Refers to the Department of the Environment, Heritage and Local Government Publication: <i>Best Practice Guidelines on the preparation of Waste Management Plan for Construction & Demolition Projects</i> July 2006.</p> <p>Recommends that consideration should be given to the provision of a Plan Policy to reflect the above recommendations and legislative requirements.</p>	<p>Youghal Town Council are committed to meeting the requirements of the Waste Management Acts and will ensure the implementation of same at development management stage. It is considered that section 5.3 adequately addresses the matter of waste and recycling within the Plan. Therefore no change is proposed.</p>	Section 5.3, Vol III

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<p>Climate Change – Recommends that consideration should be given to the possible impacts of climate change.</p>	<p>It is considered that Climate Change is adequately addressed within the plan in section 5.1 whereby it is an objective of the plan to ensure that ‘All developments should comply with national noise and vibration standards and the objectives of the Climate Change Strategy 2007 – 2013’.</p>	<p>Section 5.1, Vol III</p>
<p>Strategic Environmental Assessment – Recommend that consideration should be given as appropriate to the inclusion of a specific Objective in the Plan to ensure full compliance with the requirements of <i>Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment</i> – The SEA Directive and the associated <i>Planning and Development (Strategic Environmental Assessment) Regulations, 2004</i>.</p>	<p>The SEA Statement published with the Plan sets out the full compliance of the Plan in terms of the SEA Directive.</p>	
<p>SEA and Critical Infrastructure Planning – The Submission sets out that in proposing the Plan, and related amendments of the Plan, and in implementing the Plan, adequate and appropriate infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the particular Plan.</p>	<p>It is considered that the plan adequately addresses critical infrastructure planning as it includes policies/objectives to ensure the provision of an adequate supply of water for all existing and future developments. Also, water quality management objectives as set out in section 5.1 (Vol II) sets out that ‘Development will only be permitted where it can be demonstrated that there will be no direct or indirect damaging effects on water resources.’ The Plan also sets out a number of objectives setting out the need for adequate surface water management and prohibition of new septic tanks within the town. Therefore no change is proposed.</p>	<p>Section 5.1 and 6, Volume II</p>
<p>Obligations With Respect To National And EU Environmental Legislation - refer to responsibilities and obligations in accordance with all national and EU environmental legislation. It is a matter for Youghal Town Council to ensure that when undertaking and fulfilling their statutory responsibilities, they are at all times compliant with the requirements of national and EU environmental legislation.</p>	<p>It is considered that the Development Plan has adequate regard to national plans and policies and EU environmental legislation.</p>	

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Environmental Report		
<p>Existing Environment – Recommends provision of relevant text on the evolution of the different various aspects of the environment without implementation of the Plan, as required by Article 5(1) and Section (b) of Annex 1 of the SEA Directive.</p> <p>Consideration should be given to the inclusion of additional text on fisheries in the Plan area and traffic congestion in the Town.</p>	<p>Under the 'do-nothing scenario' in Chapter 5 of Volume III of the Plan the evolution of the different various aspects of the environment without implementation of the Plan is considered. Furthermore consideration is given to significant environmental effects on the environment in the absence of implementing the plan, within section 7 of the Plan.</p> <p>It is considered that sufficient data regarding fisheries on pages 51 and 52 of the Environmental Report on the existing environment is already presented in the environmental report and as a result no change is recommended.</p>	<p>Chapters 5 and 7 of Volume III</p> <p>Pages 52 and 53, Vol III</p>
<p>Environmental Objectives – Suggest consideration should be given to the development of additional relevant Environmental Objectives and associated Targets and Indicators for assessing environmental impact, in terms of Sustainable use of natural resources and Climate Change</p>	<p>Chapter 6 of the draft Environment Report details the environmental objectives/ sustainability criteria. These are broadly categorised in terms of the indicators outlined in the SEA Directive. In the course of carrying out the appraisal, the sustainability criteria were refined, combined and classified in order to avoid duplication and ensure a clear, focused set of criteria against which to measure the proposed Plan against. It is therefore considered that 'Climate Change' has been adequately addressed in terms of the 'Air and Climate Factors' in Chapter 6. It is considered that sustainability criteria PH1, S1- S3, W1 - W3, C3 and L1 already adequately address the sustainable use of natural resources and therefore no new environmental objectives are recommended in the environmental report.</p>	<p>Chapter 6, Vol III.</p>
<p>Selection And Assessment Of Alternatives - Suggest providing more detail on the preferred alternative. Also suggest clear justification should be provided for the selection of the preferred alternative and clarification on how the preferred alternative has influenced and informed the development of the Draft Plan.</p>	<p>A full assessment of alternatives has been undertaken and is documented in Chapter 5 of the draft Environmental Report. The SEA Statement also clearly explains the justification of the preferred alternative and indicates how it has informed the development Plan.</p>	<p>Chapter 5, Vol III and Sea Statement</p>

Appendix 1: SEA Statement Youghal Development Plan 2009 - 2015 Environmental Protection Agency Submission to draft Youghal Development Plan 2009 - 2015		
EPA Issue Raised	Response to Issue Raised	Reference in Plan or other

<p>Assessment of Environmental Effects – Seek clarification on how the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations, i.e. “<i>secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects</i>” have been assessed and documented.</p> <p>Clarify how other relevant Plans, Programmes and Projects have been addressed in the assessment of cumulative effects.</p>	<p>Section 3 of Volume III reviews related plans and Programmes related to the Plan being assessed. This review has helped to inform the environmental sustainability criteria as outlined in chapter 6 of the environment report, which have been used to assess the environmental effects (including cumulative impacts) of the policies and objectives of the draft Plan, in Chapter 6 of the environment report.</p>	<p>Section 3 and 6, Volume III</p>
<p>Mitigation measures – Seek clarification on how mitigation measures have been implemented into the Plan.</p> <p>Recommend inclusion of a summary table outlining how each significant effect is linked directly to relevant mitigation measure(s), monitoring measure(s) and, where appropriate a specific Policy or Objective in the Plan.</p>	<p>All mitigation measures as set out in the Environmental Report in Volume III and the Appropriate Assessment in Volume IV of the Plan have been incorporated into the Plan where possible. Reference to the inclusion of mitigation measures is provided in the SEA Statement of the Youghal Development Plan 2009 – 2015.</p> <p>A table has been provided within the SEA Statement setting out how each significant effect is linked directly to relevant mitigation measure(s), monitoring measure(s) and, where appropriate a specific Policy or Objective in the Plan.</p>	<p>SEA Statement</p>
<p>Monitoring – Seek clarification on the nature of the response to any significant negative environmental effects that may occur during the implementation of the Plan.</p> <p>Seek clarification on who will have responsibility for this implementation of monitoring.</p>	<p>Significant effects as set out in the Table 1 of the SEA Statement have been linked to associated monitoring measures as set out in table 12 of the Plan.</p> <p>Youghal Town Council will be responsible for implementation of the Plan and associated monitoring thereof.</p>	<p>SEA Statement</p>