

BALLYMUN LOCAL AREA PLAN 2017 SEA STATEMENT



Strategic Environmental Assessment

October 2017

Planning & Property Development Department
Dublin City Council



Comhairle Cathrach
Bhaile Átha Cliath
Dublin City Council

SEA STATEMENT
BALLYMUN LOCAL AREA PLAN
2017

27 October 2017

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1 Introduction and Background

1.1 Terms of Reference

This is the Strategic Environmental Assessment 'Statement' for the Ballymun LAP 2017-2023, prepared in accordance with the requirements of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI 436 of 2004).

The Plan was adopted at a City Council meeting on the 2nd October 2017, thereafter coming into effect four weeks from that date, in accordance with Section 20(4A) of the Planning and development Act 2000 (as amended); the plan comes into effect on the **27th October 2017**.

1.2 SEA Definition

Strategic Environmental Assessment (SEA) is the process by which environmental considerations are required to be fully integrated into the preparation of Plans and Programmes and prior to their final adoption. The objectives of the SEA process are to provide for a high level of protection of the environment and to promote sustainable development by contributing to the integration of environmental considerations into the preparation and adoption of the Plan.

1.3 Legislative Context

The SEA was carried out to comply with the provisions of the SEA Directive (Directive 2001/42/EC) of the European Parliament and of the Council, of 27th June 2001, on the Assessment of Certain Plans and Programmes on the environment, referred to hereafter as the SEA Directive. The SEA Directive was transposed into Irish Law through: -

- The European Communities (Environmental Assessment of Certain Plans and Programmes Regulations 2004 (S.I. No. 435 of 2004);
- The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004);
- Planning and Development (Environmental Assessment of Certain Plans and Programmes) (S.I No. 200 of 2011) and
- Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (S.I. No. 201 of 2011).

The legislation requires that the plan-making authority must make available a statement summarising how the SEA and consultations have been taken into account in the Plan. This statement is referred to as the SEA Statement.

1.4 Summary of the SEA Process

Step 1: Screening to determine if SEA is required. The Planning Authority undertook a screening of the proposed LAP for the purposes of determining whether an SEA was

required. Due to the size of the population within the Ballymun LAP (i.e. in excess of 5,000 persons), it was determined that an SEA was required.

Step 2: Scoping & Statutory Consultation to ensure that the relevant environmental issues are identified so that they can be addressed appropriately in the Environmental Report. The objective of scoping is to identify key issues of concern that should be addressed in the environmental assessment of the LAP. This step involved the preparation of a Scoping Issues Paper (May 2016) which was submitted to the statutory environmental authorities for their consideration. This process informs the level of detail to be included in the Environmental Report.

Step 3: Preparation of a Draft Environmental Report (alongside the draft LAP). The likely significant effects of implementing the LAP were identified, described and evaluated in the draft Environmental Report.

Step 4: Statutory Consultation on Draft LAP & Environmental Reports: The Draft Ballymun Local Area Plan and associated Environmental Assessments including the SEA were placed on public display for a period of six weeks, from 5th April to 17th May 2017 (inclusive) during which time submissions and observations were invited. A total of 226 no. submissions were received.

Step 5: Preparation of an SEA Statement summarising how environmental considerations have been integrated into the Local Area Plan, how the results of opinions expressed, submissions received and consultations carried out have been taken into account in the SEA process and the reasons for choosing the LAP as adopted. This report forms the SEA Statement.

Step 6: Monitoring of significant environmental effects following adoption and implementation of the Plan.

1.5 Implication of SEA for the Local Area Plan

Strategic Environmental Assessment (SEA) was undertaken on the Draft Ballymun LAP in order to comply with the SEA Directive and transposing Regulations. The findings of the SEA are expressed in an Environmental Report, the first published version of which accompanied the Draft Local Area Plan on public display.

In addition to the SEA, Screening for Appropriate Assessment (AA) was also undertaken on the Draft Plan, in order to comply with EU Habitats Directive (92/43/EEC) and transposing Regulations. The 'Screening for Appropriate Assessment' report contains the findings of this assessment.

A Strategic Flood Risk Assessment (SFRA) was also undertaken in order to comply with the Flood Risk Management Guidelines.

The Draft LAP and the aforementioned environmental reports were placed on public display for a period of 6 weeks from 5th of April to the 17th May 2017 (inclusive) during which time submissions and observations were invited. The elected members were invited to consider the Draft LAP and the Chief Executive's Report on Public Submission (Report no. 199/2017) and were invited to submit motions. The CE Report on these Motions (Report No. 254/2017) was circulated to the Elected Members on the 6th of July 2017. At the Council meeting on the 11th July 2017, the Members, having considered the Draft LAP and the CE Report on Submissions and Motions, resolved to make amendments the Draft LAP.

The proposed amendments were considered to be 'material' in nature therefore requiring a further period of public display and consultation. The Material Alterations were screened for Appropriate Assessment and Strategic Environmental Assessment. The proposed Material Alterations were put back on public display for a further 4 weeks from 31st July to 28th of August 2017 (inclusive). A total of 24 no. submissions/observations were received during this statutory display period. The CE report on these submissions was circulated to the Elected Members on the 5th September 2017. No further motions were received from the Elected Members.

At the City Council meeting, 2nd October, the Elected Members having considered the Chief Executive Report Nos. 199/2017, 254/2017 and 310/2017 resolved to make the Local Area Plan for Ballymun. The Local Area Plan comes into effect four weeks from the day it is made; Friday 27th October 2017.

1.6 SEA Statement

The SEA Statement is described in Article 9 of the SEA Directive as a statutory requirement and should be made available with the adopted Plan. This will be issued to the environmental authorities, previously consulted, with a view to outlining the key stages of the SEA process and illustrating how environmental considerations have been integrated into the plan and key decisions taken in the Plan as a consequence of the SEA.

The SEA Statement is required to include the following information: -

- a) How environmental considerations have been integrated into the Plan;
- b) How the Environmental Report, submissions and observations made to the planning authority and any transboundary consultations (where relevant) have been taken into account during the preparation of the Plan;
- c) The reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with; and
- d) The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

2 Integration of Environmental Considerations into the Local Area Plan

2.1 Introduction

Environmental considerations were integrated in the Local Area Plan making process at all stages. As the LAP developed, environmental considerations were directly considered at a number of stages in the SEA process as outlined in Table 1 below which shows the key stages of SEA.

This section of the report sets out how environmental considerations and the findings of the Strategic Environmental Assessment (SEA) as presented in the Environmental Report were taken into account during the preparation of the LAP for Ballymun. It also sets out how submissions on the Draft Plan and Environmental Report were incorporated into the process.

The SEA, the Appropriate Assessment (AA) and the Strategic Flood Risk Assessment (SFRA) processes have been undertaken in parallel to the preparation of the Draft Plan. From the outset, considerations of the environmental consequences of the alternatives have been taken into account. The iterative process ensured that the SEA/AA & SFRA and the preparation of the LAP were integrated in order to meet the environmental objectives and the objectives of the Plan.

Table 1: Key stages of the SEA Process

Stage	Description
Screening	The first stage of the Strategic Environmental Assessment (SEA). Screening assessed the need to undertake a SEA. Under the Planning and Development Act 2000 (as amended) a full SEA is mandatory for the Ballymun Local Area Plan 2017-2023.
Scoping	Scoping of the Ballymun LAP 2017-2023 was carried out in accordance with Article 5 (4) of the SEA Directive (2001/42/EC). Scoping is undertaken to ensure that the relevant environmental issues are identified allowing them to be addressed appropriately in the Environmental Report. The principal purpose of the Scoping stage is to decide upon the range of environmental issues to be included in the Environmental Report. By highlighting some of the significant issues at an early stage ensure these issues are firmly to the forefront when considering the objectives of the LAP. A Scoping Issues Paper was prepared by the Planning Authority and initial consultation was carried out in May 2016 with the statutory consultees.
Consultation with the Environmental Authorities	Submissions were received from the following: - Environmental Protection Agency (EPA); Department of Arts, Heritage, and the Gaeltacht (now known as the Dept of Culture, Heritage and the Gaeltacht); Fingal County Council (FCC)
Scoping Report	Submissions received from the environmental authorities were reviewed and incorporated into the process where warranted.
Preparation of ER &	A multi-disciplinary team was established to create policy consistent

Local Area Plan	<p>documents and to examine the effects on the environment of implementing the LAP objectives.</p> <p>Key principles and objectives of the LAP assessed in the Environmental Report (ER) and development options examined.</p> <p>Feedback from on-going Plan preparation process and ER preparation.</p> <p>Mitigation measures were discussed and chosen.</p> <p>Monitoring incorporated into existing methods.</p>
Monitoring the Local Area Plan	Monitoring significant environmental effects over the lifetime of the Ballymun Local Area Plan 2017-2023

2.2 Screening

Screening assesses the need to undertake a Strategic Environmental Assessment. Under the Planning and Development Act 2000 (as amended) a full SEA is mandatory for the Ballymun Local Area Plan 2017-2022, based on the size of the population (in excess of 5,000 persons).

2.3 Scoping & Pre-Draft Stage

Scoping of the Ballymun Local Area Plan 2017-2023 was carried out in accordance with Article 5 (4) of the SEA Directive (2001/42/EC).

The principal purpose of the Scoping stage is to decide upon the range of issues and level of detail to be included in the Environmental Report. An overview of the relevant environmental issues requiring further analysis is presented and considered in the Environmental Report and ultimately in the LAP itself. By highlighting some of the significant issues at an early stage ensure these issues are firmly to the forefront when considering the objectives of the LAP.

The scoping aspect involved consultation with the statutory consultees, providing an opportunity to comment on the highlighted issues and the proposed methodology. Under the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 the list of statutory consultees includes: -

- The Environmental Protection Agency (EPA)
- The Minister for Environment, Community and Local Government **(Department of Housing, Planning, Community and Local Government)*
- The Minister for Arts, Heritage and Gaeltacht Affairs **(Department of Culture, Heritage and the Gaeltacht)*
- The Minister for Agriculture, Food and the Marine **(Department of Agriculture, Food and the Marine)*
- The Minister for Communications, Energy and Natural Resources **(Department of Communications, Climate Action & Environment)*

- Any adjoining Planning Authority whose area is contiguous to the area of a planning authority which prepared a plan – in this case Fingal County Council.

Note: It should be noted that since the SEA Regulations above, the name of some of the above Government Departments have since changed. The new name of the Department is shown in italics in brackets above.

In line with best practice a Scoping Issues Paper was prepared by the planning authority to facilitate the consultation process. Initial consultation was carried out in May 2016 with the issuing of the Scoping Paper to the above mentioned statutory environmental authorities.

On foot of the Scoping Issues Paper submissions were received from the Environmental Protection Agency (EPA), the Department of Culture, Heritage and the Gaeltacht and Fingal County Council. These submissions which are summarised below were taken into account in the preparation of the draft Environmental Report: -

Environmental Protection Agency (EPA) Submission

A submission was received from the EPA dated 31st May 2016 and included information under the following headings: -

- Noted the provision of updated SEA integration guidance document (www.epa.ie/pubs/advice/ea) that sets out the key environmental issues, as relevant and appropriate to be taken into account in the preparation of the SEA and LAP.
- LAP should be consistent with the relevant higher level national planning policy and also with SEA/AA/EIA guidelines and regulations
- The LAP should include objectives to support water quality, wastewater, infrastructure, other critical infrastructure, groundwater resources, and the implementation of flood risk assessments where required, climate change adaption measures on foot of flood risk and Irish Water measures addressing Waste Water Treatment Plant (WWTP) issues.
- LAP should include objectives to support the protection of biodiversity sites, promotion of green infrastructure, implementation of the Environmental Noise Directive, improvement of air quality, support the National Climate Change Strategy and preparation of an Energy Conservation Strategy.
- LAP should promote the integration of land use zoning and phased development, the National Landscape Strategy
- LAP should promote sustainable transport options and integrated traffic management plans.

Department of Culture, Heritage and the Gaeltacht Submission (formally the Dept of Arts, Heritage and the Gaeltacht)

The Department of Culture, Heritage and the Gaeltacht responded to the scoping document, letter dated 9th June 2016. The submission outlined that Santry Demesne is a proposed Natural Heritage Area containing Hairy St. John's Wort, a protected species under the Floral Protection Order 1987 and Bat species are protected under the Wildlife Acts of 1976 – 2012 and listed under annex IV of the Habitats Directive.

Fingal County Council Submission

Fingal County Council responded in a letter dated 17th June 2016. This submission recommends that DCC and Fingal County Council should agree clear objectives for the development of the DCC lands within the administrative boundary of FCC, namely the M50 lands. Once this is done then a joint initiative can be considered between the two authorities to encourage economic development in the area, and taking account of the proposed Metro North route alignment.

All of these submissions were noted and acted upon.

2.4 Pre-Draft Non Statutory Consultation Issues Paper

The pre-draft consultation process began with the preparation of an Issues Paper, to identify the issues for the local area from the point of view of local residents, businesses, land owners, state bodies, operating services in the area and other interested stakeholders. To assist this process an Issues Paper was prepared and put on public display for a four week period, from 5th November 2015–3rd December 2015 (inclusive), with public notification by way of a newspaper notice, use of the City Council website and social media accounts (facebook, twitter) and erection of local posters in the area. During this period the Issues Paper was made available for viewing at the City Council offices at Wood Quay, in the Civic Centre, Ballymun and online at www.dublincity.ie. In addition, members of the Planning Authority were available locally in the area to assist with any queries on a number of specified days/times.

A summary of the issues raised during this period was presented to the Council in a Chief Executive's Report (Report No. 105/2016) in April 2016. The motion to prepare a Draft LAP for the area was put and carried at this meeting. Following the pre-draft consultation process, the Draft LAP was prepared.

2.5 Environmental Report

The type of information to be provided in the Environmental Report is set out in Annex I of the SEA Directive - reproduced in Schedule 2B of the Planning and Development Regulations 2001 (as inserted by article 12 of the Planning and Development (Strategic Environmental Assessment) Regulations 2004).

The Environmental Report is prepared alongside the LAP process and investigates, describes and evaluates the effects on the receiving environment of implementing the LAP. The report also assesses and identifies development alternatives and identifies the environmentally preferred development strategy.

The preparation of the Environmental Report influenced the formulation of the Local Area Plan in a number of distinct ways: -

- It encouraged the wide use of background environmental data and formally connects this data to the making of the plan
- It determined the Environmental Protection Objectives (EPOs) against which the key principles and objectives of the plan were assessed.
- The Environmental Protection Objectives (EPOs) will form the basis for the future on-going monitoring of the Local Area Plan.

- The Environmental Report which determined the identified development strategy options provides the most sustainable and appropriate environmental approach to the future development of the area's settlements, when assessed against the Strategic Environmental Objectives.
- It provides greater transparency to the public as to how environmental issues are incorporated and assessed in the plan-making process.

Key issues were identified in the Environmental Report across each of the environmental areas. The full review of key issues is set out in Chapter 3 of the Environmental Report.

2.5.1 SEA of the Draft Plan

The Draft Plan was considered for its possible impacts on the environment. The initial stage aimed to ascertain the quality, if any, of the potential impact. Each of the Plan's objectives was screened for their impact and where a neutral impact is noted no further discussion is provided within this report. This format allows for the Environmental Report to focus on the negative and positive impact.

It is thus a more robust, more focused approach to understanding the potential impact associated with the Plan's implementation. Where it was determined that an objective may potentially result in a negative impact on an environmental receptor appropriate level mitigation measures were identified or proposed.

The assessment informing the Draft Plan was arrived at following both the submissions received during Scoping Consultation in addition to the assessment of the Draft Plan key principles and objectives against the established Environmental Protection Objectives (EPO's).

2.5.2 Consideration of Alterations

A number of alternatives were considered at an early stage in the process and evaluated for their likely significant environmental effects (see section 6 and 7 of the Environmental Report). Options considered were based around the use of specific key sites for varying purposes: -

1. Main Street (site 6 to the north of the Boiler House)
2. Ballymun and Poppintree Industrial Estates
3. Road network alterations in Poppintree
4. Shangan (Site No. 10 in Chapter 6 'Site Briefs')

By evaluating each of these alternatives against the Environmental Protection Objective's the options chosen for the LAP were based upon informed environmental as well as planning considerations.

2.5.3 Mitigation

In order to comply with various statutory requirements and in order to comply with the requirements of the statutory consultees, mitigation measures are recommended to be integrated into the Plan.

As the Ballymun Local Area Plan must conform to the policies and objectives of the Dublin City Development Plan (DCDP) 2016-2022 the plan does not include a repetition of the policies, objectives, or strategies set out in the DCDP. Where standards or objectives for a particular development are not included in the Local Area Plan the provisions of the DCDP are to apply. See also Section 5.1 of the LAP. Mitigating measures included within the Plan include: -

Mitigation of Water Issues

The Ballymun Surface Water Masterplan, which has formed the basis for providing new and improved surface water connections, identifies a number of outstanding pieces of infrastructure necessary to facilitate additional development and to improve two existing areas of housing. In order to facilitate additional new development within the Shangan area, there is a need to provide a new surface water attenuation facility. This is addressed in the site brief for Site No. 10 of Chapter 6 of the LAP and objective DW1 of Chapter 5.

Objective DW1 also specifies the need to upgrade the surface water connections of Sillogue Gardens (Site no. 11 of Ch. 6) and Coultrey Gardens (Sites nos. 6 & 8 of Ch.6) with this work ideally happening in conjunction with adjoining site development works.

Mitigation for Traffic Impacts

The LAP proposes a number of new road connections considered necessary to serve the area which will enhance permeability and thus reduce (i) the need to travel by car; (ii) the distance undertaken for car trips and (iii) queuing of cars/ congestion. These connections detailed under Section 5.4 of the LAP and provided for in the site briefs (Chapter 6) will mitigate the noise and air impacts.

Mitigation for Air and Noise Pollution

The single biggest generator of air and noise pollution within the LAP stems from traffic on the road network. The LAP is ideally placed to help reduce traffic on the road network, providing new residential and employment opportunities along a core bus route and a future Metro route, in an area well served by community and social infrastructure. The build out of Ballymun has the ability to consolidate the city, reducing commuter traffic, which in turn will have a positive impact on noise and air pollution.

As required under the Dublin City Development Plan all new proposals are required to demonstrate sustainable design and construction measures to reduce emissions.

The LAPs settlement strategy will also help to mitigate the impacts of noise pollution, providing new residential units within the “quieter” residential areas, and where appropriate to provide new parks alongside them. Mixed-use and commercial activity will be focused along the Main Street. Where new residential development is proposed along the Main Street, applicants will be required to have regard to the development standards set out within the Dublin City Development Plan, and in particular Section 16.10.3 Residential Quality Standards for Apartments and Houses, which provides recommendations for minimising disruption from noise in

dwellings. The Development Plan also states that proposals close to noisy places, such as busy streets may need a noise impact assessment and mitigation plan.

Furthermore where it is considered that a proposed development is likely to create disturbance due to noise, a condition can be imposed by the Planning Authority on any planning permission limiting the hours of operation and level of noise generation.

2.5.4 Monitoring

Article 10 of the SEA Directive sets out the requirement that monitoring is to be carried out of the significant environmental effects of the implementation of the Ballymun Local Area Plan 2017-2023 in order to identify at an early stage any unforeseen adverse effects and to be able to undertake appropriate remedial action.

Chapter 10 of the SEA Environmental Report outlines the monitoring requirements for the Ballymun Local Area Plan. Methods of monitoring and indicators of change in the environment have been proposed with set targets to be reviewed mid-way through the LAP.

2.6 Submissions on the Draft LAP and Environmental Reports

The Draft LAP and associated environmental assessments were placed on public display for a period of 6 weeks (5th April - 17th May 2017 inclusive), during which time submissions and observations were invited. A series of staffed public consultation sessions were also organised during this period to coincide with the consultation period, where planners were available to answer question from members of the public.

A total of 226 no. submissions were received, including submissions from the Department of Housing, Planning and Local Government, National Transport Authority, Fingal County Council and the Environmental Protection Agency. The following is a summary of the submissions received from the statutory environmental authorities and how they were incorporated into the Plan. All of the public submissions and responses are set out in Chief Executive Report no. 199/2017.

Environmental Protection Agency (EPA) Submission

The EPA's submission acknowledged the environmental related objectives including the provision/protection of green infrastructure and biodiversity and the need to improve surface water drainage. It welcomed the undertaking of the bat survey and the need to improve access to, and the use of, public transport as a means of minimising greenhouse gas emissions. The submission included a number of specific comments and recommendations including: -

- Merit in describing in greater detail how environmental related issues such as noise and air quality issues will be mitigated/addressed.
- Useful to consider including an environmental summary section in the Plan, which highlights how the key environmental issues have been taken into account in the plan.

- Plan should consider including a commitment to integrate the relevant recommendations of the National Mitigation Plan, Climate Change Adaption Framework and any local climate change adaption strategies that may be adopted over the lifetime of the Plan, as appropriate.
- With regard to the SEA, it is suggested that there is a commitment to taking into account the relevant recommendations of the national Draft River Basis Management Plan, upon its adoption.
- Useful to consider describing whether any alien invasive species have been identified the Plan area.

The Chief Executive's report on the public submissions (Report No.199/2017) outlined the response and recommendation to the various submissions. In response to the submission from the EPA, this resulted in the following updates being made to the Environmental Report and the Draft LAP, [new text in **green**]:

- (i) To insert a new section into the SEA Environmental Report after section 9.2.3 (page 126)

Section 9.2.4 Mitigation for Air and Noise Pollution

The single biggest generator of air and noise pollution within the LAP stems from traffic on the road network. The LAP is ideally placed to help reduce traffic on the road network, providing new residential and employment opportunities along a core bus route and a future Metro route, in an area well served by community and social infrastructure. The build out of Ballymun has the ability to consolidate the city, reducing commuter traffic, which in turn will have a positive impact on noise and air pollution.

As required under the Dublin City Development Plan all new proposals will also have to demonstrate sustainable design and construction measures to reduce emissions.

The LAPs settlement strategy will also help to mitigate the impacts of noise pollution, providing new residential units within the “quieter” residential areas, and where appropriate to provide new parks alongside them. Mixed-use and commercial activity will be focused along the Main Street. Where new residential development is proposed along the Main Street, applicants will be required to have regard to the development standards set out within the Dublin City Development Plan, and in particular Section 16.10.3 Residential Quality Standards for Apartments and Houses, which provides recommendations for minimising disruption from noise in dwellings. The Development Plan also states that proposals close to noisy places, such as busy streets may need a noise impact assessment and mitigation plan.

Furthermore, where it is considered that a proposed development is likely to create disturbance due to noise, a condition can be imposed by the planning authority on any planning permission limiting the hours of operation and level of noise generation.

- (ii) Insert a new section into the Strategic Environmental Assessment (page 52): Proposed Amendment No. 11: Replace bullet point v. on top of page 52

From:

~~v. Preparation of the updated plans and programme of measures for the next cycle of river basin management plans, covering the period 2015-2021 are expected to be delivered in the second half of 2017.~~

To

v. The draft second cycle River Basin Management Plan has recently been published and is out on public consultation. This draft plan provides an assessment of the pressures on the water environment in Ireland, and the proposed programme of measure to be implemented. This will cover the period from 2018 – 2021.

(iii) Insert a new section at the end of Chapter 5 of the LAP (page 42):

Section 5.11: Integration of Environmental Considerations into the Plan

A Strategic Environmental Assessment has been carried out in compliance with the requirements of Directive 2001/42/EC of the European Parliament, the objective of which is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation of the adaptation of plans.

As required by the SEA Directive and the SEA Regulations a document referred to as an SEA Statement will be produced and made available to the public following the adoption of the Local Area Plan to make known, how the SEA process influenced the outcome and identify how environmental considerations have been integrated into the final Plan.

Environmental considerations were integrated into the LAP process at a number of stages in the SEA; at the Scoping stage, the Environmental Report stage and following the submissions and observations from the Environment Authorities and the public. In addition, the environmental sensitivities of the LAP area were communicated to the Plan preparation team on a regular basis from the outset of the Plan preparation process.

The Local Area Plan was also subject to Appropriate Assessment Screening under the Habitats Directive (92/43/EEC) at both the draft and amendment stage. The overall strategy for the LAP was to facilitate and co-ordinate development opportunities on a number of key site while addressing issues such as infrastructure, economic development, public realm and community/sporting facilities whilst achieving a sustainable city neighbourhood.

The LAP promotes the development of the remaining sites in Ballymun to help create a sustainable compact city in which to live, work and visit in line with the environmental objectives. The development of the LAP lands will alleviate the need to develop in areas that may not have existing suitable infrastructure. The LAP promotes the achievement of a more compact city with the reuse of the brownfield sites which will alleviate the need for sprawl to the urban fringes and into Greenfield sites. The LAP incorporates green infrastructure into the new developments by the provision of number of pocket parks, the provision of tree lined and landscaped streets and the creation of a green route through the M50 lands. The delivery of new homes in a sustainable manner along key public transport routes and the proposed Metro North routes will create sustainable travel patterns thus protecting air quality and reducing city noise levels. Impacts on climatic factor will be improved with the development of a more compact consolidated and sustainable mixed use area, with good transport links, which will reduce the need to travel by private car, and thus reducing emission of greenhouse gases. While in the short term there may be emissions relating to construction and infrastructural provision, these will be short term impacts.

The Ballymun Surface Water Masterplan identified a number of outstanding pieces of infrastructure necessary to facilitate additional development and to improve two existing areas of house, including the provision of a new surface water attenuation facility, and also the need to upgrade the surface water connections of Sillogue Gardens and Coultrey Gardens.

The LAP proposes a number of new road connections considered necessary to enhance permeability and thus reduce the need to travel by car, reduce queuing of cars/congestion and reducing distances undertaken for car trips which will positively impact on noise and air quality.

The LAP will have a positive impact in securing the cultural heritage of the area, by ensuring there is no loss or adverse impact on the National Inventory of Architectural Heritage or Protected Structures. The LAP seeks the provision of a new civic amenity space across from St. Pappin's Church to enhance the setting of this historic building.

The SEA concluded that the LAP included sufficient mitigation measures to offset any potential impacts on the environmental receptors. It should also be noted that all the policies and objectives of the Dublin City Development Plan (in operation at time of planning application), apply to the Ballymun LAP area.

Fingal County Council (FCC) Submission

A submission was also received from Fingal County Council which supported the Draft LAP and in particular the vision and objectives set out for the M50 lands. The submission recognised and supported the important economic role of the M50 lands and reiterated Fingal County Councils commitment to working with DCC on the consolidation of these key economic lands in proximity to the proposed Metro North route, including the provision of a link under the R108 to link these lands with the future Metro stop: -

"The 'M50' Lands' are zoned for high density mixed use development within the Fingal Development Plan 2017-2033 and the Dublin City Development Plan 2016-2022. These zoning objectives are based in part on the anticipated delivery of Metro North through Ballymun, which will serve these lands. It is an objective of Fingal Development Plan to link the Ballymun M50 lands directly with the future Metro stop, via a link under the R108 and this infrastructural requirement is acknowledged within the Draft Ballymun LAP... The Draft LAP notes that the extent of vacant lands along the Metro route in public ownership provides the opportunity to deliver suitable high density schemes along the Metro line, which will encourage sustainable travel patterns in the city... Fingal will work with DCC and the NTA to ensure the provision of a high quality transport system along this route."

FCC supports the vision for site nos. 26, 27, 28, 29, and 31 of the Draft Plan, located within the Fingal Co. Council administrative area, and notes that there is no conflict between the proposed land uses illustrated in the Draft LAP and Fingal's designated land use zoning objectives.

No changes were required or proposed to the Draft LAP on foot of this submission.

2.7 Material Alterations to Draft LAP and SEA Screening of Proposed Changes

Following the display of the Draft Ballymun Local Area Plan 2017-2023 and the public consultation period, the Chief Executive prepared and distributed to the elected members of Dublin City Council, a report on the submissions and observations received (Report No. 199/2017), including an opinion on issues raised within submissions and any recommended amendments to the Draft Plan. Following circulation of the CE Report on submissions, the Elected Members submitted 58 no. motions. The Chief Executive Report on these Motions was circulated to members on 6th July 2017 (Report no. 254/2017).

A number of the amendments agreed at the Special Council Meeting on the 11th July 2017 constituted material alterations to the Draft Local Area Plan and as such a further public display period was required under Section 20 of the Planning and Development Act 2000 (as amended). This was accompanied by the Strategic Environmental Assessment and Appropriate Assessment determinations on the proposed material alterations.

It was considered that the material alterations did not alter the over-riding principles and objectives on which the Plan is based and which have been considered fully in the SEA and AA screening process. The alterations built on existing policies and objectives of the Draft LAP – i.e. consolidation of development, maximising resources, reducing vacancy, providing for mixed tenure and exploration of additional sporting and open space requirements. Taking into account the measures that have already been integrated into the Draft LAP which contribute towards environmental protection, environmental management and sustainable development, it was identified that the potential adverse effects arising from proposed changes were either present already or will be mitigated so as not to be significant (residual adverse). The mitigation measures have been integrated into the Draft LAP as set out in Section 8 of the SEA undertaken for the Draft Plan.

2.7.1 Submissions on Material Alterations

The material alterations and the environmental determinations were put back on public display for a period of four weeks from 31st July to 28th August 2017 (inclusive). A total of 24 no. submissions/observations were submitted. A number of prescribed bodies commented on the material amendments including the Department of Housing, Planning and Local Government, the Environmental Protection Agency (EPA), Fingal County Council (FCC) Irish Water (IW) and Transport Infrastructure Ireland (TII).

All of the public submissions and responses on the material alterations are set out in Chief Executive Report no. 310/2017. Submissions from the prescribed bodies are summarised below: -

Department of Housing, Planning and Local Government

The submission from the Department of Housing, Planning and Local Government notes the additional and amended objectives and made no further comments. No amendments were proposed on foot of this submission.

Environmental Protection Agency (EPA)

The submission from the EPA welcomes the inclusion of the new Section 5.11 – ‘Integration of Environmental Considerations’, and acknowledges the inclusion of amendments to further support cycling and public transport usage, and to integrate the Transport Strategy for Dublin 2016-2035 into Section 5.4. In relation to potential future amendments the submission notes that the City Council should determine whether the implementation of such would likely to have significant effects on the environment. The submission also raises the need to prepare a SEA statement following adoption of the Plan. No further amendments were proposed on foot of this submission. The preparation of this report is in line with the EPA’s submission request.

Fingal County Council (FCC)

FCC supports the overall strategy for the Ballymun LAP which is to facilitate and coordinate development opportunities on a number of key sites while at the same time

addressing issues such as infrastructure, economic development, public realm and community/sporting facilities to achieve a sustainable city neighbourhood. In relation to the Material Alterations the submission from FCC supports the new: -

- Movements Objectives proposed for inclusion at the end of Section 5.4.6 - MOA, MOB, MOC.
- Wording and objectives to be included in Section 5.8 (Sports, Recreation & Open Space) relating to the provision of a new home for Ballymun Kickhams.

The submission notes that the mutual planning strategy between DCC and FCC will aim to optimise the relationship of future development with Metro North and maximise the benefits of having a high capacity public transport system running through Ballymun. No further amendments were proposed on foot of this submission.

Irish Water (IW)

The submission from Irish Water does not anticipate that the proposed material alterations will impact on its ability to facilitate the Ballymun LAP. The submission advises that Irish Water will only be in a position to confirm water and wastewater availability for site specific new development through Irish Water's pre-comment enquiry process. No further amendments were proposed on foot of this submission.

Transport Infrastructure Ireland (TII)

The submission from TII observes and welcomes the inclusions in Chief Executive Reports no. 199/2017 and no. 254/2017 which have taken account of TII's submission and also the member's motions to the Draft LAP.

The submission requests that the Plan takes account of the critical need to safeguard the strategic function of the national road network in the area, in particular the M50 motorway. In response the CE proposed the inclusion of the following wording (new wording in green) within Proposed Amendment No. 6 from report 199/2017, as follows: -

"Given the location of the M50 lands, adjoining junction 4 of the M50, a key Trans European Transport Network within Ireland, it is imperative that all proposals for these lands take account of the M50 Demand Management Project and the Department of Housing, Planning, Community and Local Government's 'Spatial Planning and National Roads Guidelines' to safeguard the strategic function of the national road network in the area.

3 Consideration of Alternatives

3.1 Introduction

This section describes the alternative scenarios considered for the Draft Ballymun Local Area Plan 2017-2023, as set out in Chapters 6 and 7 of the SEA Environmental Report which accompanied the Draft LAP.

The issue of alternatives is a critical function of the SEA process and necessary to evaluate the likely environmental consequences of a range of alternative development strategies for the plan area, within the constraints imposed by environmental conditions. The SEA Statement reflects the content of Section 20(3)(f) of the Planning and Development Act 2000, as amended.

Following the public consultation on the Draft LAP, options considered under alternatives nos. 3 and 4, were subject to further amendments as detailed below.

3.2 Legislation Context

Article 5 of the SEA Directive requires the consideration of reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme and the significant environmental effects of the alternatives proposed. It states under Article 5(1) that: -

'Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.'

In accordance with SEA guidelines the alternatives put forward should be reasonable, realistic and capable of implementation. They should also be in line with the appropriate strategic level at which the Plan will be implemented within the national and City planning hierarchy. The Ballymun Local Area Plan 2017-2023 will be framed within a policy context set by a hierarchy of National, Regional and City level strategic plans as well as the Irish and European legislative framework. Therefore the options for alternatives are limited, and a scenario such as the 'do-nothing' situation was not included as it is neither reasonable nor realistic.

The alternatives proposed have been assessed against the relevant Environmental Protection Objectives (EPOs) established for the key aspects of the environment likely to be affected by the Plan's implementation. The evaluation process resulted in the identification of potential impacts and informed the selection of the preferred development scenario for the Ballymun LAP.

3.3 Reason for Choosing the Alternatives as Chosen for the Draft LAP

This section summarises Section 6 and 7 of the Environmental Report which evaluates the various Alternatives chosen and their impact on the Environmental Protection Objectives as set out in Section 4 of the Environmental Report.

Article 5 of the SEA Directive requires the plan-making authority to identify, describe and evaluate alternative ways of realising the objectives of the plan. As stated in the Directive an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.

For the Ballymun LAP, the alternatives were based on four of the larger key sites in the LAP area and the scope of opportunities that they could offer.

3.3.1 Alternative No. 1: Coultry, Main Street

Location: Site no. 6, Main Street

This site comprises an area of land under DCC ownership, in addition to a terrace of 8 no. houses (of which 2 no. are in DCC ownership). Development options considered as part of the LAP process included (1) retaining the existing terrace of 8-houses and building around them, or (2) demolishing the houses to make way for a more comprehensive redevelopment option. The LAP supports the second option, i.e. demolition of the 8 no. houses, on the basis of maximising the development potential along a public transport route.

For this site two alternatives were examined:

Alternative 1A: To develop the site while retaining Nos. 18-25 Coultry Gardens in situ.

This option would require new Main Street development to step-down significantly and integrate with the 2-storey terrace. Nos. 18-25 Coultry Gardens are of radburn-style development thus requiring access arrangements to be retained to both the front and rear of the houses. The existing off-set nature of the access road from Coultry Road creates a difficult junction with Coultry Link Road, unsuitable to serve the entire site. Without the option for demolition, new development would be arranged on a more constrained site. Not only would the building area be limited but considerations such as loss of light, overlooking and set-backs/ separation distances would have to be factored in and this in turn would reduce overall density on the site.

Alternative 1B: Acquire and Demolish No. 18-25 Coultry Gardens

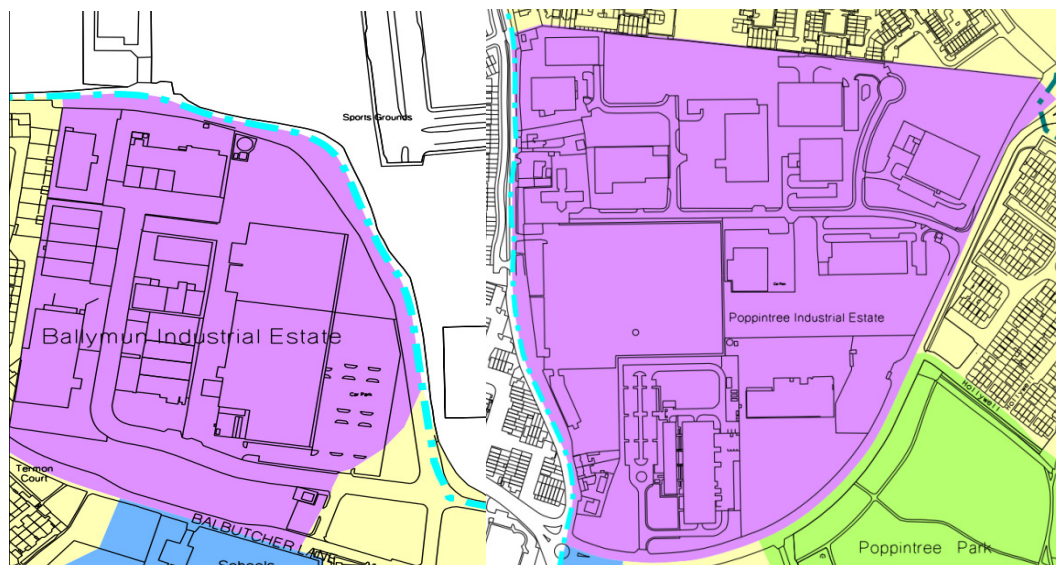
In order to maximise the development potential of the site, it is proposed to acquire and demolish Nos. 18-25 Coultry Gardens. This creates a large site capable of delivering development at a quantum and density suitable for a site adjoining Main Street, a QBC and the future Metro route (located within 200m of the stop for the previously permitted Metro North scheme). The site could be developed in line with the Z4 District Centre zoning and SDRA designation for mixed uses that will cater for extensive commercial, community and residential services. As an unencumbered site, a more coherent, direct and appropriate access can also be put in place to serve the entire site. It is noted that BRL previously acquired Nos. 62-65 Country Gardens to facilitate a comprehensive redevelopment of the adjoining site to the east.



Alternative Chosen: Given the location of the site along the Main Street and along a future Metro route, the complexity of the layout of the existing houses and road network serving them; together with the need to optimise best use of available land within the city, and in particular along public transport routes, the LAP favours the demolition of the 8 no. houses in order to optimise development potential of the site.

3.3.2 Alternative No. 2: Industrial Estates

Location: Ballymun and Poppintree Industrial Estates



Alternative 2A: Maintain the industrial uses of these lands

This alternative seeks to maintain these industrial estates for the stated zoning purpose of enterprise and employment creation. These Z6 lands are key employment locations within the city and strategically located close to Dublin Airport, M50/M1 network and proposed Metro.

In surveying the estates as part of the LAP preparation process (Q3 2016), the estates are deemed to operate at roughly 75-80% occupancy rate, and provide a considerable level of local employment.

Alternative 2B: Propose a re-zoning away from Z6

This alternative considered a rezoning of these lands as part of the City Development Plan review, under objective CEE04. Located within close proximity to schools, parks and a wide variety of community facilities, consideration was given to the suitability of these sites for residential purposes.

Alternative Chosen: Taking account of the existing employment basis within these estates, the need to create additional local employment, Ballymun's classification as a disadvantaged area (Pobal index), and the availability of land for housing in the LAP area, it is considered that these two industrial estates should remain employment centres for Ballymun and retain their Z6 zoning status. The LAP supports the growth and consolidation of these industrial estates.

3.3.3 Alternative no. 3: Balbutcher Lane Road Network

Location: Road network alterations along Balbutcher Lane North in Poppintree, for the road network adjoining Poppintree Community and Sports Centre.



● Road to be extinguished as per the Ballymun Masterplan

Extract from Dublin City Development Plan showing existing road network at Balbutcher Lane and Z9 lands either side

Alternative 3A: Extinguish section of Balbutcher Lane North

One alternative considered was to retain the Masterplan objective to extinguish a section of Balbutcher Lane North creating a cul-de-sac to the immediate north-east of No. 228 Balbutcher Lane, and with Balbutcher Lane north terminating at the 5-side of Poppintree Community and Sports Complex. Traffic would be redirected north through Hampton Wood to St. Margaret's Road; north along Carton Terrace, and with a new north-south link at Carrig Road. This alternative allows for the creation of a large area of open space (zoned Z9) to link directly with the Poppintree Community and Sports Centre.

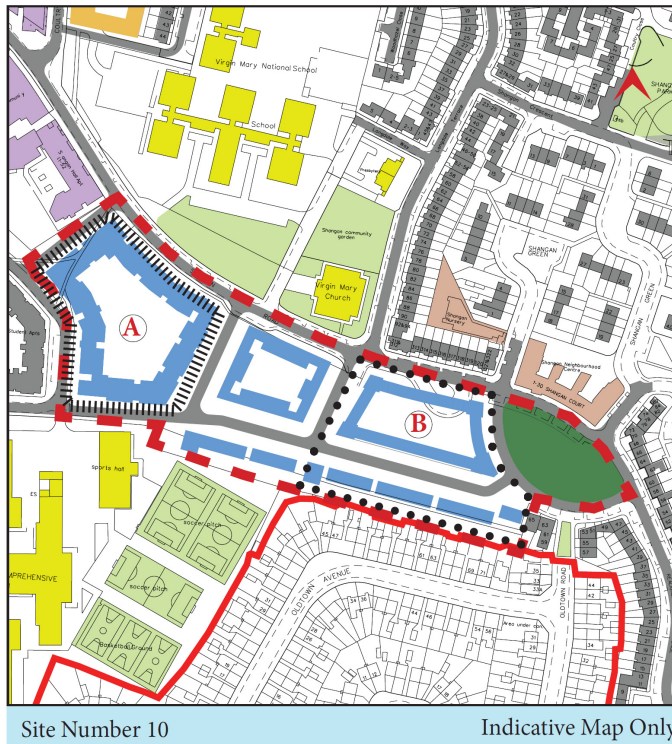
Alternative 3B: Retain Balbutcher Lane in its current format

The alternative is to retain the existing Balbutcher Lane in its current format. This scenario will require some modification to the intersection between Balbutcher Lane and Carton Terrace. It also divides the area of open space, zoned Z9 into two parts.

Alternative Chosen: During the LAP preparation process all outstanding road and infrastructure projects required to serve the area and individual sites were reviewed. The sporting provision was also reviewed in consultation with local clubs and providers. No clear sporting use was identified for the adjoining Z9 lands. It was further noted that the wayleave through this area has been substantially diverted north to St. Margaret's Road, thus potentially allowing future development on the adjoining lands. In the absence of any clear sporting requirement it is not considered necessary to alter the road network at this location.

3.3.4 Alternative no. 4: Shangan Road Housing Site

Location: Site No. 10, Shangan Road (see Chapter 6 of LAP)



Alternative 4A: Develop the site for residential uses only

This alternative would see residential development across the entirety of the site at various densities to integrate with existing development. It is estimated that the site could accommodate c. 150-180 residential units, with buildings of 4/5 storey development adjacent to the Civic Centre and 2/3 storeys adjoining Oldtown Avenue and Shangan Road/ Avenue. The development would align with objectives of the draft LAP and City Development Plan core strategy to provide sustainable residential densities in the city, within proximity to public transport, services and amenities.

Alternative 4B: Provide sporting uses alongside residential development

This alternative would see a mix of residential and sporting uses for this site. The no. 1 priority project identified at the sporting consultation workshop was for the provision of an enlarged all-weather pitch to the rear of the Trinity Comprehensive School. In order to accommodate this option it would be necessary to reduce the amount of land allocated for residential purposes thus reducing the density of the overall site. This alternative allows for the creation of a sporting hub when viewed alongside the existing gym, Futsal Dome and tennis courts.

Alternative Chosen: Both of these alternatives were considered during the LAP preparation process, and both are considered to have significant benefits for the local population. It is considered that a final decision on the use of these lands is best made following the review of GAA facilities for the area (objective SR08 of the Draft LAP; SRO8 deleted and replaced with SRO12 in adopted Plan) and the review of the Z9 lands to the west of Carton Terrace (objective SR07 of the Draft Plan; SRO7 amended and renumbered SRO9), to avoid an over provision of open space viewed against the need to provide housing within the City.

3.4 Environmental Assessment of Alternatives

Section 7 of the Environmental Report sets out the evaluation process of the various alternatives as set out in Section 6 of the Report as the Environmental Protection Objectives (EPOs) previously identified in Section 4 of the Report. The EPO's are outlined below in Table 2.

Table 2 (see also Section 4 Table 12 of the Environmental Report)

Environmental Protection Objectives	
ENVIRONMENTAL RECEPTOR	ENVIRONMENTAL PROTECTION OBJECTIVE
Population and Human Health	PHH To create a sustainable compact city in which to live, work and/or visit. <i>(other EPOs relating to population and human health are covered under each of the environmental headings below)</i>
Biodiversity/Flora & Fauna	BFF To protect and where appropriate enhance the diversity and range of habitats, species and their resources within the LAP area.
Air Quality & Noise	AN1 To protect good air quality status and minimise all forms of air pollution (i.e. Nitrogen oxides & Particulate Matter). AN2 To maintain and, where possible, improve the good acoustical quality for the current and future residents of the plan area.
Climatic Factors	CF To minimise emissions of greenhouse gases.
Water	W1 To comply with EU Water Framework Directive to ensure and maintain good ecological status of all receiving water in the LAP area. W2 To reduce and manage the risk of flooding. W3 To provide adequate wastewater treatment, water distribution and drainage networks.
Material Assets	MA1 To reduce traffic levels by encouraging modal change from car to more sustainable modes of transport such as public transport, walking & cycling. MA2 To reduce the generation of waste and adopt a sustainable approach to waste management.
Cultural Heritage	CH To protect and conserve the cultural heritage including the built environment and settings; archaeological (recorded monuments, architectural structures, materials and urban fabric) and manmade landscape features.
Landscape & Soils	LS To protect and where appropriate enhance the character, diversity and special qualities of Ballymun's landscapes and soils.

The impact of each alternative was assessed against the EPO's using the following assessment key: -

Table 3 (see also section 7.1 of the Environmental Report)

SYMBOL	IMPACT ON THE ENVIRONMENTAL PROTECTION OBJECTIVE
+	Significant Beneficial Impact
?	Uncertain impact
X	Significant Adverse Impact
0	No Relationship, or Insignificant Impact

The evaluation of the various alternative scenarios was tested against the EPOs and this was detailed in Section 7.2 of the Environmental Report.

The tables set out below provide a summary of the four key sites (See also section 7.3.1 – 7.3.4 of the Environmental Report): -

3.4.1 Alternative No. 1: Coultry, Main Street

Table 4 below summarises the environmental assessment of the alternatives considered for Site 6, Main Street (north of the Boiler House).

Table 4: No. 1 Alternative Summation

EPO	Alternative 1A Retain nos. 18-25 Coultry Gardens and develop vacant lands around them.	Alternative 1B Acquire and demolish Nos. 18-25 Coultry Gardens to make way for a comprehensive redevelopment option.
PHH	x	+
BFF	x	+
AN1	x	+ / x
AN2	x	+
CF	x	+ / x
W1	x	+ / x
W2	x	+
W3	x / 0	+ / x
MA1	0	+
MA2	0 / x	+ / x
CH	0	0
LS	0	+

Alternative Chosen 1B: Given the location of the site along the Main Street and along a future Metro route, the complexity of the layout of the existing houses and road network serving them; together with the need to optimise best use of available land within the city, and in particular along public transport routes, the LAP favours the demolition of the 8 no. houses in order to optimise development potential of the site.

3.4.2 Alternative No. 2: Industrial Estates

Table 5 below summarises the environmental assessment of the alternatives considered for the Ballymun and Poppintree Industrial Estates.

Table 5: No. 2 Alternative Summation

EPO	Alternative 2A To maintain these industrial estates for the stated zoning purpose of enterprise and employment creation.	Alternative 2B To favour a rezoning of these lands to residential as part of the City Development Plan review, under objective CEE04.
PHH	+	+
BFF	0 / +	+ / x
AN1	0 / x	+
AN2	0 / x	+
CF	0 / x	+ / x
W1	0 / x	+
W2	0 / +	+
W3	0 / x	+
MA1	0	+
MA2	0 / x	+ / x
CH	0	0
LS	0	+

Alternative Chosen 2A: Taking account of the existing employment basis within these estates, the need to create additional local employment, and the availability of land for housing in the LAP area, it is considered that these two industrial estates should remain employment centres for Ballymun and retain their Z6 zoning status. The LAP supports the growth and consolidation of these industrial estates.

3.4.3 Alternative No. 3: Balbutcher Lane Road Network

Table 6 below summarises the environmental assessment of the alternatives considered for the road network in Poppintree.

Table 6: No. 3 Alternative Summation

EPO	Alternative 3A Retain Ballymun Masterplan objective to remove a section of Balbutcher Lane creating a cul-de-sac to the immediate north-east of No. 228 Blabutcher Lane, and with Balbutcher Lane north terminating at the 5-side of Poppintree Community and Sports Complex.	Alternative 3B Retain the existing Balbutcher Lane road network in its current format. This scenario will require some modification to the intersection between Balbutcher Lane and Carton Terrace. It also divides the area of open space, zoned Z9 into two parts.
PHH	0 / +	0
BFF	+	x
AN1	0	0
AN2	0	0 / +
CF	0	0
W1	0	0
W2	+	0
W3	+	0
MA1	0 / +	+
MA2	x	0
CH	0	0
LS	0	0

Alternative Chosen 3B: During the LAP preparation process all outstanding road and infrastructure projects required to serve the area and individual sites were reviewed. The sporting provision was also reviewed in consultation with local clubs and providers. No clear sporting use was identified for the adjoining Z9 lands. It was further noted that the wayleave through this area has been substantially diverted north to St. Margaret's Road, thus potentially allowing future development on the adjoining lands. In the absence of any clear sporting requirement it is not considered necessary to alter the road network at this location.

3.4.4 Alternative No. 4: Shangan Road Housing Site

Table 7 below summarises the environmental assessment of the alternatives considered for Shangan (Site No 10 in Chapter 6 of LAP).

Table 7: No. 4 Alternative Summation

EPO	Alternative 4A To provide residential development across the entire site.	Alternative 4B To provide residential development and an extension of the sporting facilities to the rear of the Trinity Comprehensive school (all weather pitch).
PHH	+	+
BFF	+	+ / x
AN1	+	+ / x
AN2	0	x
CF	+ / x	+ / x
W1	+	+
W2	+	+
W3	+ / x	+ / x
MA1	+	+
MA2	0	0
CH	0	0
LS	+	+

Alternative Chosen 4A & 4B: Both of these alternatives were considered during the LAP preparation process, and both are considered to have significant benefits for the local population. It is considered that a final decision on the use of these lands is best made following the review of GAA facilities for the area (objective SR08 of the LAP; SRO8 deleted and replaced with SRO12 in adopted Plan) and the review of the Z9 lands to the west of Carton Terrace (objective SR07 of the Draft Plan; SRO7 amended and renumbered SRO9), to avoid an over provision of open space viewed against the need to provide housing within the City.

3.5 Amendments to Alternatives

A number of amendments were made in relation to Alternative Nos. 3 and 4 above, following the publication of the Draft LAP: -

Alternative no. 3

- Following the public consultation phase of the Draft LAP requests were received to provide a skate and bike park and / or allotments and a community farm in Ballymun. It is an objective of the adopted plan (SRO9) to review the use of the site to the north of this road for such uses or residential development (the latter would

involve a variation to the Development Plan). Alterations to this road network may be considered as part of these proposals. Such development proposals would require planning permission and the environmental assessment would thus be assessed in greater detail as part of this process. (A Development Plan variation would also be subject to a SEA and AA process).

Alternative no. 4

- Following the public consultation phase of the Draft LAP requests were received to provide a site for Ballymun Kickhams / enhanced GAA facilities. Site no. 31 (Balcurris) was identified as a potential location for such uses to be explored as per objective SRO12. Subsequently the alternative proposal to provide sporting uses alongside residential development has since been excluded and the site brief for site no. 10 Shangan amended. The selection of Alternative no.4B in the adopted Plan still accords with the overriding vision and ethos of the Draft Plan which is for the consolidation of development, maximising resources and reducing travel patterns.

These amendments were subject to Strategic Environmental Assessment and Appropriate Assessment determinations.

4 Monitoring Measures and Reporting

4.1 Introduction

Article 10 of the SEA Directive requires that monitoring should be carried out in order to identify at an early stage any unforeseen adverse effects due to the implementation of the Plan, and to be able to take remedial action if required. Monitoring is carried out by reporting on a set of indicators which enable positive and negative impacts on the environment to be measured. Environmental targets and indicators were developed during the SEA process and were developed during the SEA and the preparation of the Plan; see Section 4 of the Environmental Report. The monitoring is based on these indicators.

Section 10 of the Environmental Report (Table 25 of ER and see also Appendix 1 below) sets out the Monitoring Programme. The monitoring programme has been devised having regard to the existing monitoring systems in place and in use by Dublin City Council. Monitoring plays an important role in assessing whether the LAP is achieving its environmental objectives and targets, whether these need to be re-examined and whether the proposed mitigation measures are being implemented. It also enables at an early stage, the identification of any unforeseen adverse effects and enables appropriate remedial action to be taken.

The monitoring programme is subject to review at each reporting stage to reflect new data. Should this identify significant adverse impacts (such as impacts on designated sites etc) early on in the implementation of the LAP, this should trigger a review of both the LAP and associated monitoring programme. All information gathered from planning applications and reports submitted which include information on any surveys carried out or environmental constraints mapping should be integrated into the monitoring programme.

4.2 Indicators and Targets

This section sets out the proposed monitoring measures in accordance with Article 10 of the SEA Directive which requires that *“significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen effects, and to be able to undertake appropriate remedial action”*. A monitoring programme has been devised having regard to the existing monitoring systems in place and in use by Dublin City Council.

4.3 Data Sources

Measurements for indicators generally come from existing monitoring sources, such as those maintained by Dublin City Council and other relevant authorities, e.g. the Environmental Protection Agency (EPA), the National Parks and Wildlife Service (NPWS) and the Central Statistics Office (CSO). The Development Management process in Dublin City Council will provide passive monitoring of various indicators and targets as applications come in. In the case where significant adverse effects, including positive, cumulative or indirect impacts have the potential to occur, i.e. impact on ecological networks for example, as a result of undertaking of individual projects, such instances should be identified and recorded and should feed into the monitoring process. Monitoring will focus on aspects of the environment that are likely to be significantly impacted on by the LAP. Where possible indicators have been chosen based on the availability of the necessary information and the degree to which data will allow the target to be linked directly to the implementation of the plan.

4.4 Monitoring

For the purposes of the Strategic Environmental Assessment (SEA) of the Ballymun LAP, the SEA in-house team developed environmental protection indicators (EPOs), targets and indicators early on in the SEA process; see Section 4 of the Environmental Report.

Monitoring of the indicators is essential in order to track the impacts of the proposed development on the environment. A monitoring programme setting out the environmental protection objectives, targets, indicators, frequency of reporting and department responsibility is included in the Environmental Report (see Table 25 of the Environmental Report: Monitoring Programme).

4.5 Responsibility

Dublin City Council will be responsible for gathering the monitored data, the preparation of the interim report and the implementation of corrective actions, if necessary.

4.6 Thresholds at which Corrective Action will be taken

- The occurrence of flood events
- Court cases taken by the Department of Culture, Heritage and the Gaeltacht regarding impacts upon archaeological heritage including entries to the Record of Monuments and Places;
- Complaints received from statutory consultees regarding avoidable impacts resulting from development which is granted permission under the LAP, and
- Boil notices on drinking water,

4.7 Conclusion

The Strategic Environmental Assessment carried out during the preparation of the LAP has ensured that any potential significant environmental impacts of the Plan have been identified and that they may have been given appropriate consideration. Consultation on the proposed plan and environmental report has further contributed to the development and finalisation of the adopted Local Area Plan. The SEA statement is not the final stage of the process as the plan will be monitored over its lifetime and reported on at regular intervals to assess its impact on the environment.

Appendix 1: Monitoring Programme (See also Table 25 of the Environmental Report)

Table 25: Environmental Protection Objectives, Targets & Indicators

Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency of Reporting	Department Responsible
Population and Human Health	<i>PHH To create a sustainable compact city in which to live, work and/or visit.</i>	Sustainable densities achieved in new residential/ mixed use schemes.	Average density of new residential development for LAP area.	Mid-LAP	Planning and Property, Development Department
		Increase in the number of residential properties.	Number of residential units commenced on site/ completed within LAP.	Mid-LAP	Planning and Property, Development Department
		Increased population within the LAP area.	Percentage increase in population based on CSO.	Mid-LAP based on 2016 census results	Planning and Property, Development Department
Biodiversity, Flora & Fauna	<i>BFF To protect and where appropriate enhance the diversity and range of habitats, species and their resources within the LAP area.</i>	No losses of relevant habitats species or their sustaining resources as a result of implementing the LAP.	Survey and monitor bird population.	Mid-LAP	Parks & Landscape Services
			Survey and monitor distribution of bat populations.	Mid-LAP	Parks & Landscape Services
			Evidence of recorded Protected Species.	Mid-LAP	Parks & Landscape Services
			Survey and monitor extent and distribution of invasive species.	Mid-LAP	Parks & Landscape Services
		All streets to be tree-lined where possible to encourage biodiversity connectivity.	No. of new trees planted in the LAP area.	Mid-LAP	Parks & Landscape Services
		New local parks provided	No. of new parks provided	Mid-LAP	Parks & Landscape Services

Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency of Reporting	Department Responsible
Air Quality and Noise	AN1 To protect good air quality status and minimise all forms of air pollution (i.e. Nitrogen oxides & Particulate Matter).	Maintain air quality status and meet value targets for named pollutants in line with Air Quality Framework Directives.	Values of monitored pollutants in the air, including the levels of Nitrogen Oxides (NO _x) and Particulate matter (PM ₁₀) not in breach of regulation limits.	Mid-LAP	Roads & Traffic – Noise & Air Section
		An increase in the population travelling to work or school by public transport or non-mechanical means.	% of population within the plan area travelling to work or school by public transport or non-mechanical means.	Mid LAP - To be based on 2016 Census results	Roads & Traffic Planning and Property, Development Department
	AN2 To maintain and, where possible, improve the good acoustical quality for the current and future residents of the plan area.	Minimise noise pollution.	% of residents exposed to noise levels above undesirable levels.	Mid-LAP	Roads & Traffic – Noise & Air Section
Climate Factors	CF To minimise emissions of greenhouse gases.	Decrease greenhouse gas emissions in line with national targets.	Average energy consumption of new residential housing stock Tonnes of CO ₂ /Capita/Year.	Mid-LAP	Environment and Engineering Department in association with Codema
Water (including flooding)	W1 To comply with EU Water Framework Directive to ensure and maintain good ecological status of all receiving water in the LAP area.	All water bodies to meet targets set in River Basin Management Plan of the Eastern River Basin District.	Ecological status of water bodies.	Mid-LAP	Environment and Engineering Department – Water Division

Environmental Receptor	Environmental Objective	Protection	Target	Indicator	Frequency Reporting	of	Department Responsible
Water (contd)	W2 To reduce and manage the risk of flooding.		Compliance with the OPW's Guidelines for Planning Authorities – The Planning System and Flood Risk Management.	Percentage of planning applications incorporating flood risk assessment and conditions requiring appropriate flood resilient measures for new developments.	Mid-LAP		Environment and Engineering Department (Planning and Property, Development Department)
			Provide Sustainable Urban Drainage Systems in all new developments.	Number of Sustainable Urban Drainage Systems implemented in new planning applications.	Mid-LAP		Environment and Engineering Department (Planning and Property, Development Department)
			Implement the Ballymun Surface Water Masterplan.	Provision of attenuation storage within Shangan and upgrade status of pipework in Coultrey Gardens and Sillogue Gardens	Mid-LAP		Environment & Engineering – Water Division (in association with Irish Water)
	W3 To provide adequate wastewater treatment, water distribution networks and drainage networks		Provision of adequate water, wastewater treatment and drainage infrastructure.	Capacity of water supply and wastewater infrastructure versus demand.	Mid-LAP		Environment & Engineering – Water Division (in association with Irish Water)

Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency of Reporting	Department Responsible
Material Assets (transport and waste management)	MA1 To reduce traffic levels by encouraging modal change from car to more sustainable modes of transport such as public transport, walking & cycling.	Extension and improvement of the cycling and walking network in the area.	Length of new cycling paths/lanes and walking routes developed and permeability linkages created.	Mid-LAP	Roads & Traffic Department
		Metro North to serve the area.	Metro North granted planning permission/ on site/ operational.	Mid-LAP	Roads & Traffic Department
	MA2 To reduce the generation of waste and adopt a sustainable approach to waste management.	Increased recycling.	% of waste recycled.	Mid-LAP	Environment & Engineering – Waste Division
Cultural Heritage	CH To protect and conserve the cultural heritage including the built environment and settings; archaeological (recorded monuments, architectural structures, materials and urban fabric) and manmade landscape features.	Ensure that the cultural heritage of the LAP area is maintained and protected from damage or deterioration	No. of archaeological sites investigated/ number of planning applications with input from or screened by the City Archaeologist.	Mid-LAP	Planning and Property, Development Department
			Provision of new square/ civic space across from St. Pappin's Church.		

Environmental Receptor	Environmental Protection Objective	Target	Indicator	Frequency of Reporting	Department Responsible
Landscape (including soil)	<i>LS To protect and where appropriate enhance the character, diversity and special qualities of Ballymun's landscapes and soils.</i>	Develop brownfield lands and vacant sites	Total area of brownfield lands and vacant sites developed/ granted planning permission.	Mid-LAP	Planning and Property, Development Department
		Develop new areas of open space	Number of new parks/ open spaces, green link through the M50 lands.	Mid-LAP	Parks & Landscape Services (Planning and Property, Development Department)