

***Strategic
Environmental
Assessment***

*Prepared by RPS on
behalf of Clonmel Borough
Council & South Tipperary
County Council.*

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Abbreviations

AA	Appropriate Assessment
CDP	County Development Plan
C&EDP	Clonmel and Environs Development Plan 2013 - 2019
DAFM	Department of Agriculture, Food and the Marine
DAHG	Department of Arts, Heritage and the Gaeltacht
DCENR	Department of Communication, Energy and Natural Resources
DECLG	Department of Environment, Community and Local Government
EC	European Community
EIA	Environmental Impact Assessment
EPA	Environmental Protection Agency
EU	European Union
GIS	Geographic Information System
NHA, pNHA	Natural Heritage Area, proposed Natural Heritage Area
NPWS	National Parks and Wildlife Service
NSS	National Spatial Strategy
OTI	Objectives, Targets and Indicators
RMP	Recorded Monuments and Places
RPG	Regional Planning Guidelines
SAC	Special Area of Conservation
SEA	Strategic Environmental Assessment
SPA	Special Protection Area

1. Introduction

Strategic Environmental Assessment (SEA) is a process for evaluating, at the earliest possible stage, the likely environmental effects of implementing a Plan or other strategic action in order to ensure environmental considerations are appropriately addressed in the decision-making process, both during their preparation and prior to adoption of a Plan.

The European Directive (2001/42/EC) on the Assessment of the Effects of Certain Plans and Programmes on the Environment (the SEA Directive) was transposed into national legislation by the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435/2004), as amended by S.I. 200 of 2011 and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436/2004), as amended by S.I. 201 of 2011. The Clonmel and Environs Development Plan 2013 - 2019 (hereafter referred to as 'C&EDP') falls under the remit of S.I. 436/2004 and S.I. 201/2011.

SEA legislation requires that the Plan making authority make available a statement summarising how the SEA and consultations have been taken into account in the Plan (Section 13I of S.I. 436/2004). This statement is referred to as the SEA Statement.

This is the SEA Statement of the C&EDP 2013 Strategic Environmental Assessment. Figure 1.1 shows Clonmel and Environs' location within the wider area and current administrative boundary.

The SEA process comprises of four main steps and these have been followed for the SEA of the C&EDP 2013 - 2019 as outlined in Table 1.1. An illustration of the key steps in the SEA process is also shown in Figure 1.2.

Step	Requirement in relation to C&EDP
1 – Screening	The requirement to carry out SEA of the C&EDP is mandatory in accordance with both Articles 2 and 3 of the SEA Directive as the Plan is: a) subject to preparation and adoption by a local authority and b) it is prepared for land use which will set the framework for future development consent of projects listed in the EIA Directive.
2 – Scoping	An initial SEA Scoping Issues Paper was issued to the relevant Environmental Authorities and Development Plan statutory consultees in December 2011. During this time the Pre-Draft Public Consultation Period also took place. The EPA responded by letter dated 6th January 2012 enclosing the EPA's initial submission which consisted of an SEA Guidance document with respect to the C&EDP and SEA Pack dated 11th October 2011. A further Scoping Report was sent to the five environmental authorities on the 19th April 2012 and responses were requested by 18th May 2012. No formal responses were received at this stage of the consultation process.
3 – Environmental	The draft C&EDP, together with the SEA Environmental Report and AA went on

<p>Assessment and Environmental Report</p>	<p>public display from the 12th October 2012 to the 21st December 2012.</p> <p>A total of 43. no submissions were received, reviewed and proposed amendments were made as a result, these were documented in the s. 12(4) Managers' Report which went on public display on 21st June 2013 to 22nd July 2013. All such amendments were screened as part of the SEA and Appropriate Assessment processes.</p> <p>During this stage once again, submissions received (14 no. in total) were reviewed and recommendations were made and documented in the S. 12(8) Manager's Report dated August 2013. These recommendations were again screened for SEA / AA prior to adoption of the final Plan.</p>
<p>4 – SEA Statement</p>	<p>This SEA Statement reports on how environmental considerations and the consultations for the C&EDP have been integrated into the adopted Plan.</p>

Table 1.1: Steps Followed in the SEA Process for C&EDP 2013

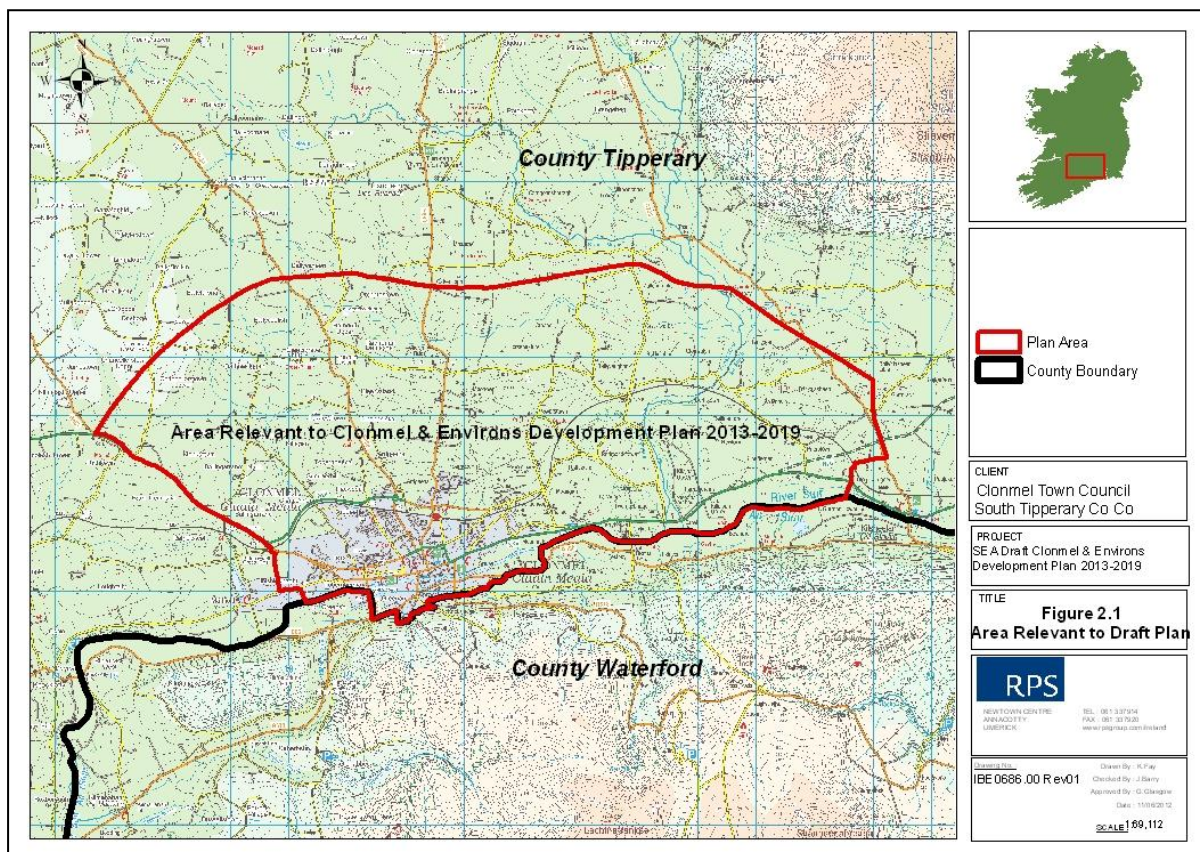


Figure 1.1: Clonmel & Environs Development Plan Area & Administrative Boundary

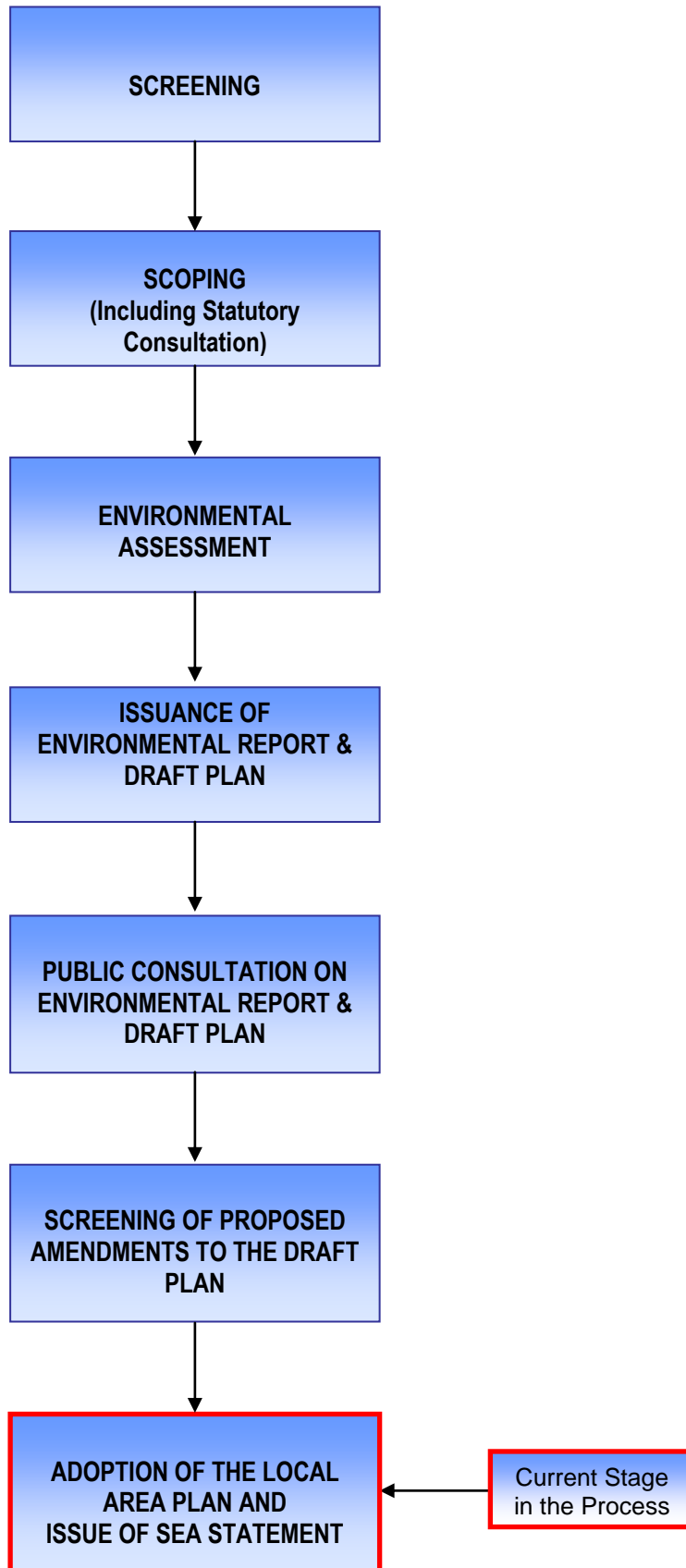


Figure 1.2: Overview of SEA Process

1.1 Content of the SEA Statement

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 within the adopted Plan. 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.

In accordance with section 13I of the Planning and Development (Strategic Environmental Assessment) Regulations, 2004 (as amended), the Planning Authority is required to prepare a statement summarising the following: -

- a) *“how environmental considerations have been integrated into the Plan,*
- b) *how*
 - (i) *the environmental report pursuant to article 13C,*
 - (ii) *submissions and observations made to the planning authority in response to a notice under section 12(1) or (7) of the Act, and*
 - (iii) *any consultations under article 13F, have been taken into account during the preparation of the plan,*
- c) *the reasons for choosing the plan, as adopted, in light of the other reasonable alternatives dealt with, and*
- d) *the measures decided upon to monitor, in accordance with article 13J, the significant environmental effects of implementation of the plan”.*

This SEA Statement summarises the above mentioned considerations and follows a similar format to that outlined above.

1.2 Environmental Assessment of the Plan

The C&EDP sets out the overall strategy for the sustainable development of Clonmel Town and its environs from 2013-2019. The previous C&EDP was adopted in 2008. This Plan builds on the 2008 Plan in seeking to build on Clonmel Town’s strengths and to provide a focused approach to planning for future growth in a coherent, sustainable, spatial fashion. The main aim of the C&EDP is to enable Clonmel to fulfill its regional role to its greatest potential and to promote and develop the town as the primary growth centre for South County Tipperary.

The Plan has been prepared and developed against a backdrop of consultations through meetings and written submissions. The Plan, as the main public statement for the area, provides a vision for the town and environs to evolve, giving statutory context for guiding development in the interests of the proper planning and sustainable development.

The Environmental Assessment involved assessing the potential impacts of elements proposed in the draft Plan. This was done by first gathering and assessing all available baseline information on indicators described in the SEA Directive i.e. biodiversity, flora and fauna, population, water, soil, climate change, material assets, cultural heritage and landscape. It was considered necessary to combine some indicators in order to avoid unnecessary duplication.

The process involved a series of meetings/workshops attended by members of the RPS SEA and AA team and various Clonmel Borough Council and South Tipperary County Council departmental staff including the planning officers preparing the draft Plan. There was continued discussion and liaison between the project teams to check on and improve the updates to the Plan. Also with regard to changing elements as the Plan evolved, any new impacts were identified and evaluated.

2. How Environmental Considerations HAVE BEEN Integrated into the Plan

2.1 Introduction

Integration of the SEA and the C&EDP was achieved through close involvement of relevant team members at all stages of the project, including SEA scoping, review of the existing environment and generation of policies and objectives. The SEA, AA, Strategic Flood Risk Assessment (SFRA) and C&EDP teams participated in several meetings and telephone discussions in relation to development of alternatives, gathering of baseline environment, development of land use zonings and development of policy and text recommendations for inclusion in the draft Plan.

This section outlines how the Plan evolved and at what stages the SEA influenced the Plan.

2.2 Baseline Data Collection

From the outset, a key aspect of the SEA (and AA) has been the collection of relevant environmental baseline data for the administrative area covered by the Plan area. This was achieved through consultation with and review of various existing databases and data sets available through Clonmel Borough and South Tipperary County Councils' and organisations such as the EPA, National Parks and Wildlife Service and the Geological Survey Ireland.

Through detailed discussions at the beginning of the draft plan and SEA process, the plan team identified that the baseline environment of the environmental report should be limited to relevant data only and based on GIS mapping where possible. Collection of this information has allowed the identification of key environmental sensitivities, sensitive areas and pressure points within and surrounding the Plan area. GIS mapping has been used in the Environmental Report to illustrate the data, where possible, in order to allow easy visual recognition of pressures and sensitivities in and around Clonmel Town and its environs. Detailed consultation took place during the preparation and gathering of baseline data and GIS mapping preparation to inform the SEA and AA.

The key environmental issues identified as a result of review of the baseline environment are set out in Table 2.1 below. These environmental pressures have been used to inform the SEO's used to assess the alternative scenarios for the development of the town and the draft plan policies and objectives.

Issue Area	Existing Environmental Pressures
Flora, Fauna and Biodiversity	<p>Within 15km of Clonmel and its Environs there are 3 SACs - Lower River Suir which is located within the Plan Boundary, the Nire Valley Woodlands SAC and the Comeragh Mountains SAC which are located approximately 10 km to the south of the Plan area. There are ecological sites of international, national and local importance located within the Plan area. The River Suir SAC is of particular importance.</p> <p>Population growth and associated development has potential to put pressure on designated sites within and in the vicinity of the town.</p> <p>Existing pressures in the town have led to losses of biodiversity and flora and fauna through the construction of hard standing surfaces as a by product of development.</p>

Issue Area	Existing Environmental Pressures
	<p>The area has experienced pressure from development associated with an urban centre which has developed in order to cater for significant population increases. This has led to pressure on local river systems such as the River Suir which is a SAC.</p> <p>Any development that could lead to fragmentation of the network of protected areas and ecological corridors required to support the movement of species and to sustain habitats, ecological processes and functions, can have serious impacts for biodiversity and qualifying features of Natura 2000 sites.</p>
Population and Land Use	<p>In order to achieve population growth within Clonmel town to achieve critical mass and meet the town's projections set out under the RPGs, it will be necessary to support growth rates per annum over and above those experienced in the last inter censal period. This growth will give rise to the following considerations with respect to impact on the environment:</p> <p>There will be a need to achieve balanced population growth in the town central areas and the adjoining suburban areas in order to achieve balanced growth and development;</p> <p>In order for new housing to meet population projections (population increase of approximately 4,500 persons) there will be a demand for development on greenfield lands which puts pressure on agricultural lands and open spaces;</p> <p>Local services and social infrastructure will be required in tandem with growth in population, particularly in relation to schools and leisure facilities;</p> <p>New population is likely to put pressure on utilities i.e. electricity and telecommunications etc., and public services i.e. waste water and water supply resources, etc.</p> <p>New development is likely to put increased pressure on the existing transportation networks as the greatest increase in population will be in the environs and not the urban area, if trends continue.</p> <p>New development must not contribute to flood risk in the town or downstream of the town.</p> <p>New development must occur in the framework of the prevention of Climate Change and put in place measures to reduce energy consumption and lower the production of green house gases.</p>
Soil	<p>Soil erosion and potential resulting contaminated surface water run-off from construction works has a major potential to impact on water quality, civic infrastructure and fisheries resources.</p> <p>Development pressure on land outside of the urban area may restrict the agricultural potential of these soils and decrease the sustainable production of food within proximity to urban areas.</p> <p>Areas with a high proportion of gley soils (i.e. heavy wet soils) such as that seen in</p>

Issue Area	Existing Environmental Pressures
	<p>parts of the town environs may not be suitable for the location of on-site wastewater treatment systems from one-off housing as there may be insufficient depth of free draining subsoil's. Therefore, there is increased risk of contamination of surface waters in these areas.</p> <p>Areas with high proportions of vulnerable groundwater (i.e. shallow depths to bedrock) in these karst areas are highly susceptible to contamination from on-site wastewater treatment system discharges such as septic tank effluent associated with one-off housing. In addition, land use activities such as land spreading of organic wastes and inorganic fertilizers or spraying of crops can also impact on groundwater quality.</p>
Water	<p>The water quality status of River Suir downstream of Clonmel is currently classified "moderate". The objective of the Water Framework Directive is to ensure that all water bodies achieve "good" status by 2021, and as this section of the River Suir is less than good status, improvements are necessary.</p> <p>All discharges from the Clonmel WWTP are to surface water and the River Suir which runs adjacent to the plant. All discharges from the plant are the subject of a discharge license. Regular monitoring is carried out by the Council, Aecom and the EPA and demonstrates that the discharge from Clonmel wastewater treatment plant does not significantly impact the River Suir. Overloading of the WWTP as a result of increased development within the town has the potential to impact the River Suir.</p> <p>Urban runoff is also likely to contribute to the pollution of watercourses.</p> <p>It is considered that the completion of projects arising out of the WSIP (Water Services Investment Programme) will resolve the majority of issues regarding any potential wastewater treatment constraints up to 2017. This will allow for wastewater treatment capable of serving sustainable and in some instances, appropriate higher density development of the area, without any negative impact on the achievement of the objectives of the WFD.</p> <p>Existing water supply will need to be augmented to cater for long term future demand. It is an objective of the Council to seek to identify opportunities to augment the Clonmel Borough and Rural Water Supply Scheme as part of the Water Services Investment Programme.</p> <p>According to EPA Drinking Water Remedial Action List Q1 of 2012 the Clonmel Poulavanogue water supply which supplies part of the town had an inadequate treatment for Cryptosporidium. The EPA Drinking Water Remedial Action List recommendation is to abandon this source and replace with supply from a new Clonmel water supply.</p>

Issue Area	Existing Environmental Pressures
Climate	<p>Flood risk has become a major issue in Clonmel due to the severity and frequency of flood events in recent years. The primary concern is the provision of an effective means of protecting the town from excessive flooding. Changes in the occurrence of severe rainfall events as a result of climate change over the next 50 to 100 years would be likely to increase the frequency and severity of flooding events and inundation, which could result in damage and loss to houses and infrastructure.</p> <p>Flooding risks could be further exacerbated by:</p> <ul style="list-style-type: none"> • Inappropriate located urban development increasing the speed and volume of run-off; • Changes to geomorphological processes such as sediment transport, siltation and erosion. <p>Flooding can also cause erosion of bank sides and sediment release from bank collapse and from surrounding lands when inundated lands become very unstable. It can also destroy riparian vegetation and habitats for various insect bird and mammal species. If severe enough it may destroy ecological networks and corridors between various fragmented habitats.</p> <p>Flooding may also cause the release of dangerous chemicals if industrial chemicals come into the waterways via flooded industrial sites, inundated municipal and industrial wastewater treatment facilities. These dangerous substances are detrimental to plant and fish species. The immediate threats to ecosystems and biodiversity as a result of flood risk is primarily related to unsustainable land use practices.</p>
Cultural Heritage	<p>The accommodation of further development in Clonmel has the potential to cumulatively impact upon the heritage features of the area.</p> <p>Development which involves material alterations or additions to protected structures can detract from the special character of the structure and its settings, and have the potential to result in the loss of features of architectural or historical interest.</p> <p>Development on sites adjoining protected monuments, places or structures can also impact the setting of these cultural heritage items.</p> <p>Potential for improvement of cultural heritage facilities in the town including improvement and maintenance of the towpath along the river Suir.</p>
Landscape	<p>There are a number of protected landscapes, scenic routes and protected views surrounding the town within the jurisdiction of South Tipperary County Development Plan and the Waterford County Development Plan which are outside of the Plan area. It is important that recognition is given to these features in the preparation of the C&EDP to ensure that these features are not impacted upon going forward. As part of the development of the Plan consultation should be carried out with adjoining authorities regarding assets located outside of the Plan area.</p> <p>There is currently no habitat mapping for Clonmel Town available, thus it is necessary to rely on the composite mapping of relevant sites available to the Council.</p>

Issue Area	Existing Environmental Pressures
Material Assets	<p>At present the waste water treatment plant for the town is operating within capacity and while the current and projected population of Clonmel is well below the capacity of the plant, industries account for a significant allocation of the capacity. An upgrade to the treatment plant may be required as part of significant or large scale development.</p> <p>Congestion along the N24 due to through traffic and as a result of congestion at key times from local traffic is problematic. A new By-Pass for the town is considered necessary to alleviate traffic congestion, manage traffic circulation and enhance pedestrian movements within the town centre. New residential developments to the north of the town will be required to provide interconnector routes in order to address traffic management issues.</p> <p>Existing walking and cycling facilities within the town are required to be upgraded in order to reduce congestion and improve air quality within the town.</p>

Table 2.1: Existing Environmental Pressures

2.3 Environmental Assessment of the Plan

The SEA process involved consultation and meetings with members of the SEA and AA team and a number of specialists and Clonmel Borough and South Tipperary County Councils' who focussed on the significant environmental issues identified during the screening and scoping phases and assessment of baseline information for the area.

A system of Strategic Environmental Objectives was employed in the assessment of the draft Plan policies, objectives and actions. Development of these has been the result of comments made at the scoping stage, discussions with the Plan team and with reference to the sensitivity mapping produced for the baseline in the SEA.

The SEA reviewed each individual policy, objective and actions contained in the draft C&EDP against the objectives and associated assessment criteria developed for the SEA (see Table 2.2).

Where a negative assessment was recorded, the SEA provided suggested amendments in the form of changes, additions or deletions to text as a result of the assessments.

Objective 1 Biodiversity Flora and Fauna (BFF)	Protect and where appropriate, enhance biodiversity, particularly protected areas and protected species.
Objective 2 Population (P)	Improve people's quality of life based on high-quality residential, working and recreational environments and on sustainable transport.
Objective 3 Water (W)	Improve water quality and the management of watercourses to comply with the standards of the Water Framework Directive and incorporate the objectives of the Floods Directive into sustainable planning and development.
Objective 4 Soil (S)	Protect and, where appropriate, enhance the function and quality of the soil resource in the lands within the Plan area.
Objective 5 Climate (C)	Contribute to mitigation of, and adaptation to, climate change.

Objective 6 Cultural Heritage (CH)	Protect and, where appropriate, enhance the character, diversity and special qualities of rich cultural, architectural and archaeological, heritage in the Plan area.
Objective 7 Landscape (L)	Protect and, where appropriate, enhance the character, diversity and special qualities of landscapes and protected views in the Plan area.
Objective 8 Material Assets (MA)	Make best use of existing infrastructure and promote the sustainable development of new infrastructure.

Table 2.2: SEA Objectives and Detailed Assessment Criteria

2.4 Influence of SEA during preparation of the Plan

2.4.1 Residential Development Strategy – Alternatives Assessment

Detailed discussions and assessment took place as part of the preparation of the development strategy alternatives assessment of residentially zoned lands. The residential sites selected as part of the alternatives assessment will provide for 125 ha of the 155 ha of new residential development land required under the Core Strategy within the Plan area. An additional 30 ha of land located just outside the Plan boundary area on lands zoned for new residential use within the administrative area of Waterford County Council have also been included to make up this allocation.

As part of this process it was clear that the Clonmel Environs located within Waterford County Council area should be included within the C&EDP plan area as these lands essentially form part of the town, however these lands are not administratively connected in terms of development planning at present. This made review of the Core Strategy difficult and was a stumbling block in the preparation of a development strategy for the town.

As a result, the SEA recommended inclusion of text within the Plan outlining that future development plan reviews of the C&EDP should re-examine the plan boundary, particularly with regard to the Waterford Environs area with a view to ensuring housing land requirements for the settlement of Clonmel co-relate to the development plan for the town and its entire environs.

2.4.2 Land Use - Development Strategy

Detailed consultation took place between the Plan, SEA, AA and SFRA teams in preparation of the C&EDP. All parties reviewed and discussed the Core Strategy to ensure its compliance with the hierarchy of plans. As part of this review, detailed discussions took place with respect to population projections and targets, zoning allocations and uses. As part of this discussion it was proposed to extend the Primary Retail Area (PRA) of the town southwards. It was a recommendation of the SEA team not to extend the PRA southwards as this would result in higher order retail uses on lands closer to the River and more susceptible to flooding. The PRA was not extended in this direction as a result.

During the course of the preparation of the Plan, it was a proposed objective of the Plan to reduce the number of land use zonings relating to the Plan area in order to streamline and make land use objectives clearer. Initially it was proposed to change 'Commercial' zonings to 'Town Centre' zoning with respect to lands closest to the town and 'Industry' with respect to lands further out of the town (such as Poppyfields). During pre-draft discussions, it was a recommendation of the SEA team to re-introduce 'Commercial' zoning within the land use zonings as the SEA and SFRA was not supportive of the

extension of the town centre to sites which are susceptible to flooding. Furthermore, sites such as Poppyfields were re-zoned for 'Commercial' uses in line with the retail warehousing use on site.

2.4.3 Mitigation Measures Proposed as a Result of Assessments and Amendments Stages

Mitigation measures proposed as a result of the detailed assessment of policies and objectives of the C&EDP are set out in Table 2.3 below. Mitigation measures are proposed in the form of new policies / objectives and / or amendments to the text of policies / actions / objectives. The mitigation included in the assessment of policies and objectives does not refer to the general requirement for assessment of impacts on the environment but instead assumes requirements for environmental assessment in accordance with the normal development management process and EIA Directive as a given.

Column one of Table 2.3 firstly provides a comment or reason for inclusion of the mitigation measure. While column two sets out the mitigation measures and / or changes in **RED** (new text to be included) or by way of **STRIKETHROUGH** (text to be deleted) as proposed at pre-draft plan stage.

Column three identifies whether the proposed recommendation of the SEA were included within the draft Plan at draft Plan stage (Consultation period October to December 2012). Column four identifies whether the proposed recommendation of the SEA were included within the draft Plan at Amendment Stage (June/July 2013) or Adoption Stage (October 2013) (identified in **Green** at Amendment Stage and **Blue** on Adoption Stage).

Table 2.3: Mitigation Measures Proposed as a Result of Assessment of Policies, Actions and Strategic Objectives

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
Specific Town Centre Actions			
<p>Negative impacts with respect to B/FF and S due to development of hardstanding in car parks. Recommend inclusion of following text: <i>Surface car parks should include permeable or semi permeable surfacing to reduce surface water run off and mitigate against contribution to flooding.</i></p>	<p>TC 6 The Council will, as part of a Car Parking Strategy to be prepared during the lifetime of this Plan, examine opportunities to increase and improve the car parking facilities in and serving the town centre with particular emphasis on Suir Island and Mary Street with the improvement of surface car parking areas under the Public Realm and Traffic Calming Programme. The Strategy will include the consideration of one multi-storey car park in or immediately adjacent to the PRA.</p> <p>Surface car parks should include permeable or semi permeable surfacing to reduce surface water run off and mitigate against contribution to flooding.</p>	<p>New text included in Section 9.19 setting out that 'Surface car parks should be permeable or semi-permeable surfacing to reduce surface water run-off and mitigate against contribution to flooding'.</p>	<p>No further changes.</p>
Economy, Employment and Education Policies			
<p>This policy is not site specific therefore it is difficult to assess. On this basis recommend inclusion of a pre-request that this policy will be subject to 'other planning and sustainable development considerations relevant to the proposal or its surroundings'. This will allow future assessments to take relevant environmental considerations into account.</p>	<p>Policy ECON 3: Non-Conforming Uses Where commercial/employment/industrial enterprises exist as non-conforming but long established uses, it is the policy of the Council to facilitate their continued operation where appropriate subject to other planning and sustainable development considerations relevant to the proposal or its surroundings. Where such uses have ceased, the Council will generally only consider redevelopment for new uses that conform with the land use zoning for the area.</p>	<p>As part of the Development Management process, consideration to other protective policies and actions of the Plan will also be considered therefore this wording change is not required.</p>	<p>No further changes.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
Infrastructure Policies			
<p>Given the strategic nature and extent of this proposal recommend inclusion of text specifically outlining the requirement to undertake AA screening and to adhere to EIA requirements.</p>	<p>Policy INF 2: Protection of Reservation Corridor for the Re-alignment of the N24 It is the Policy of the Council to ensure that the reservation corridor for the proposed N24 by-pass of Clonmel remains free from development and the Council will support NRA road development proposals in the interest of improved traffic capacity and movements for the town which will be subject to AA Screening and EIA requirements.</p>	<p>Section 9.7 and 7.2 of draft Plan provides an overall objective for EIA and AA.</p>	<p>No further changes.</p>
<p>Potential for negative impacts on B/FF P, S, W, C and M if developments are granted planning permission and inadequate water supply available. Recommend rewording this Policy to ensure that development will only take place where appropriate and sustainable water supply is in place.</p> <p>According to EPA Drinking Water Remedial Action List Q1 of 2012 the Clonmel Poulavanogue water supply had an inadequate treatment for Cryptosporidium and the proposed action programme recommends abandoning this source and replace with supply from a new Clonmel water supply. Recommend inclusion of text to ensure that the Council will provide adequate treatment of water supplies.</p>	<p>Policy INF 6: Drinking Water It is the policy of the Council to facilitate the adequate provision, treatment and upgrading of the Water Supply Network in line with development. Development proposed in this plan will only take place where appropriate and sustainable water supply is in place.</p>	<p>Recommendation included in draft Plan as follows: 'It is the policy of the Council to facilitate the adequate provision, treatment and upgrading of the Water Supply Network in line with development.'</p>	<p>This policy was further amended as follows at amendment stage in June 2013: It is the policy of the Council to promote the standards and objectives of the south-eastern river basin management plan and to facilitate and monitor the adequate provision, treatment and upgrading of the Water Supply Network in line with development. Proposals for development will be required to demonstrate that an appropriate and sustainable water supply is in place prior to occupation.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>Potential for negative impacts on B/FF P, S, W, C and M if developments are granted planning permission with inadequate waste water provision.</p> <p>Recommend rewording this Policy to ensure that development will only take place where appropriate wastewater provisions are in place.</p>	<p>Policy INF 7: Wastewater It is the policy of the Council to facilitate the provision, upgrading and maintenance of adequate and appropriate Waste Water Service Network in Clonmel to service new development and in assessing planning applications will require the following measures to be met by applicants; (a) Proposed developments to comply with the detailed requirements of the Council including the River Basin Management Plan and the protection of the Lower River Suir cSAC and water status. (b) Proposed developments to connect to the public sewer where available. (a) Development proposed in this plan will only take place where appropriate and sustainable waste water infrastructure is in place which will secure the objectives of the relevant River Basin Management Plan and the protection of Natura 2000 sites with water dependant habitats or species. This must be provided and be operational in advance of the commencement of any discharges from development. (b) Waste water infrastructure must be capable of treating discharges to ensure that water quality in the receiving river does not fall below legally required levels. Sustainable Urban Drainage Systems (SUDS) will be required for all developments discharging within or upstream from Natura 2000 sites with water dependant habitats or species.</p>	<p>Recommendation included in draft Plan as follows: 'It is the policy of the Council to facilitate the provision, upgrading and maintenance of adequate and appropriate Waste Water Service Network in Clonmel to service new development and in assessing planning applications will require; (a) Proposed developments to comply with the detailed requirements of the Council including the River Basin Management Plan and the protection of the Lower River Suir cSAC and water status. (b) Proposed developments to connect to the public sewer where available.'</p>	<p>No further changes.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>Overall positive effects with respect to flooding impacts on the town. Recommend inclusion of Guidance and recommendations of SFRA directly within the development Plan for ease of reference.</p>	<p>Policy INF 15: Flood Risk Assessment The Planning Authority will require development proposals to have regard to the potential flood risk to the development itself and its impact for flood risk elsewhere. Applications shall comply with the recommendations of Section 7 of the C&EDP Strategic Flood Risk Assessment. The council will prohibit new development within floodplains other than development which satisfies the justification test, as outlined in the Planning System and Flood Risk Management Guidelines for Planning Authorities, within Clonmel.</p>	<p>Section 9.6 of the Draft Plan sets out that with regard to new development and Flood Risk, all proposals for new development must have regard to, and where necessary demonstrate compliance with, the Flood Management & Mitigation Measures contained within the attached SFRA (Volume 2) and the River Suir CFRAM (when available) (See also Maps 5 & 5a).</p>	<p>Policy further amended at Amendment stage in June 2013 as outlined in Green and amended further in October 2013 on adoption of the plan as outlined in Blue as follows:</p> <p>Policy INF 15: Flood Risk Assessment</p> <p>The Planning Authority will require development proposals to have regard to the potential flood risk to the development itself and its impact for flood risk elsewhere. Applications shall have regard to “the Planning System and Flood Risk Management – Guidelines for Planning Authorities 2009” and comply with the recommendations of Section 7 of the C&EDP Strategic Flood Risk Assessment. The council will prohibit new development within floodplains other than development which satisfies the justification test, as outlined in The Planning System and Flood Risk Management Guidelines for Planning Authorities, 2009. After the publication of the OPW River Suir Catchment Flood Risk Management Plan (expected to be 2016) and its associated Flood Risk Maps, the Council will also apply the relevant findings and recommendations set out therein in assessing flood risk in the plan area. In the event of a conflict arising between the C&EDP Strategic Flood Risk Assessment and the OPW Flood Risk Maps, the recommendations of the OPW Flood Risk Maps will take precedent.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>New SEA policy recommendation based on EPA scoping submission.</p>	<p>Policy INF 16: Protection of Floodplains and wetlands The council will protect and enhance floodplains and wetlands subject to flooding as vital green infrastructure which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reducing the need to provide flood defences in the future.</p>	<p>As part of the interaction between the Plan, SEA, AA and SFRA and noting the location of fixed defences including embankments on the northern bank, the Plan provides for amenity zoning to the embankments and along the southern bank to Flood Zone C on Greenfield sites.</p>	<p>This policy was included at Amendment stage in June 2013 as follows:</p> <p>Policy INF 16: Protection of Floodplains and wetlands</p> <p>The council will protect and enhance floodplains and wetlands subject to flooding as vital green infrastructure which provides space for storage and conveyance of floodwater, enabling flood risk to be more effectively managed and reducing the need to provide flood defences in the future.</p>
<p>New Policy Recommendation as Water Framework Directive surface water status for some parts of Clonmel and Environs area is classified as 'Moderate' and small areas to the north east and west are classified as 'Poor'.</p>	<p>Policy INF 17: Water Framework Directive It is the policy of the Council to improve the surface water status for the area and implement objectives and measures for individual water bodies as set out in the South Eastern River Basin Management Plan (SERBMP) and associated Programme of Measures (POM)</p>	<p>Text in relation to same in draft Plan on page 120.</p>	<p>This action was included at amendment stage in June 2013 as follows:</p> <p>110 The council are committed to improving the surface water status for the area and support the objectives and measures for individual water bodies as set out in the South Eastern River Basin Management Plan (SERBMP) and associated Programme Of Measures (POM).</p>
<p>New SEA policy recommendation based on EPA scoping submission.</p>	<p>Policy INF 18: South Eastern Catchment Flood Risk Assessment The council is committed to implementing the outcomes of the South Eastern Catchment Flood Risk Assessment and Management (SECFRAM) study when complete.</p>	<p>Section 9.6 of the Draft Plan sets out that with regard to new development and Flood Risk, all proposals for new development must have regard to, and where necessary demonstrate compliance with, the Flood management & Mitigation Measures contained within the attached SFRA (Volume 2) and the River Suir CFRAM (when available) (See also Maps 5 & 5a).</p>	<p>This following action was also included at amendment stage in June 2013 as follows:</p> <p>19 The council are committed to the implementation of on-going maintenance, evaluation of integrity and performance of flood defences during the lifetime of the plan and this will take place in consultation with the relevant statutory agencies.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>New SEA policy recommendation as per comments in INF 6 above.</p>	<p>INF 19: Local Authority Development All Local Authority development within the plan area will be subject to adhere to the policies, objectives and development management requirements of this Plan.</p>	<p>Recommendation not included within draft Plan as Local Authority development is subject to the same requirements as private developers.</p>	<p>No further changes.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
Specific Infrastructure Actions			
<p>New SEA policy recommendation based on review of baseline environment and EPA scoping submission.</p> <p>According to EPA Drinking Water Remedial Action List Q1 of 2012 the Clonmel Poulavanogue water supply had an inadequate treatment for Cryptosporidium and the proposed action programme recommends abandoning this source and replace with supply from a new Clonmel water supply.</p>	<p>I 7 The Council is committed to obtaining a new water abstraction point from the River Suir at Marfield including ancillary water treatment facilities. Anticipating long term future demand the Council will seek to identify opportunities to augment the Clonmel Borough and Rural Water Supply Scheme as part of the Water Services Investment Programme.</p>	<p>Text included in section 5.2 of Plan setting out that the Councils intention is to reduce reliance on Poulavanogue as a source of raw water and to implement the WSIP as funding becomes available.</p>	<p>Section 5.2 Drinking Water updated at amendment stage in June 2013 as follows:</p> <p>Clonmel currently receives its water supply from sources at Poulavanogue, Glenary, Caherclough North and Monroe. The Poulavanogue and Glenary supplies are from mountain streams. The Caherclough North and Monroe supplies are from a ground water source that were installed and commissioned as advance works under the Clonmel Town & Rural Water Supply Scheme. A third borehole will be commissioned in late 2012.</p> <p>Clonmel currently receives its water supply from three water supply schemes; Glenary, Poulavanogue and Monroe.</p> <p>The Glenary Water Treatment Plant (WTP) was constructed in 1964. Raw water is abstracted from the Glenary River, an upland river and fed by gravity to the treatment plant. The WTP is a conventional surface water treatment plant incorporating chemical coagulation, settlement tanks, rapid gravity filters, chlorination and fluoridation. There are two outlet pipes from the WTW. One pipe feeds into Ardnagassaun Reservoir (Capacity 4500cu M) and the other pipe feeds directly into supply. The Glenary Scheme serves the areas east and west of the town.</p>

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			<p>The main source of raw water for the Poulavanogue Water Treatment Plant is the Lyranearla River and is supplemented by nugents stream and Boola River during periods of low flow. The WTP has been in operation since 1933. Treatment is by slow sand filtration followed by chlorination and fluoridation. The upland source is vulnerable to rapid colour change. The WTP is unable to remove colour. The Ragwell Reservoir (capacity 2200cum) previously provided storage for the Poulavanogue scheme.</p> <p>This reservoir was taken out of commission as a result of excessive leakage. The Poulavanogue Scheme currently supplies the town centre area and Davis Road area. Glenary and Poulavanogue Water Supply Schemes rely on upland rivers for raw water abstraction. Issues with supply can occur during periods of dry weather when river yield is low.</p> <p>The Monroe supply is from groundwater borehole sources located north of Clonmel. There are boreholes at Monroe, Caherclough North and a third borehole was commissioned at Carrigawillin In late 2012. the water is classified as hard water. The scheme supplies all areas of Clonmel north of Frank Drohan Road (N24) with the exception of the Powerstown area. The chlorinated supply was installed and commissioned as advance works under the Clonmel Town & Rural Water Supply Scheme.</p> <p>The primary objective of the Clonmel Town & Rural Water Supply Scheme is to...</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
New SEA policy recommendation based on EPA scoping submission.	1 8 The Council is committed to developing a water conservation and leak detection programme.	This new Action has been included within the draft Plan.	No further changes.
Housing Policies			
Inclusion of sustainability as a criterion in this policy should ensure impacts to biodiversity, flora and fauna, soils, water quality, air quality and climate, cultural heritage and landscape are avoided or at least minimised, provided that these issues are considered during planning of new development or extension / refurbishment of existing development.	Policy HSG 7: Neighbourhood Centres It is the policy of the Council to ensure the provision of appropriate sustainable neighbourhood centres incorporating retail, service and community facilities in conjunction with new residential development where required and appropriate. Such Neighbourhood Centre type shops shall not compete with the town centre commercial role and will be assessed under the provisions of the Guidelines for Planning Authorities - Retail Planning 2012, the County Retail Strategy 2010 and any amendment thereof.	As part of the Development Management process, consideration to other protective policies and actions of the Plan will be considered.	No further changes.
Built and Natural Heritage, Amenity and Recreation Policies			
Overall considered to be a positive policy. However recommend inclusion of a map illustrating trees worthy of protection.	Policy AH 9: Tree Preservation It is the policy of the Council to seek the protection of healthy mature trees that are significant features in the landscape. Development that requires the felling of such trees will be discouraged. Recommendation for inclusion of text as follows: The Council will undertake a survey of healthy mature trees in the Plan area in order to identify those worthy of ongoing protection in advance of the next Statutory Plan.	Policy updated as follows: AH 9 updated as follows: 'The Council will undertake a survey of healthy mature trees in the Plan Area in order to identify those worthy of ongoing protection in advance of the next statutory plan'.	No further changes.
New SEA policy recommendation based on EPA scoping submission.	Policy AH 10: The Council will endeavor to prepare Landscape Character Assessment and obtain Habitat Mapping for the Plan Area in order to identify those worthy of ongoing protection in advance of the next statutory plan.	New Policy AH 10 included within Plan.	This following amendment was made to action AH 10 at amendment stage in June 2013 as follows: AH 10 The Council will endeavour to prepare Landscape Character Assessment and obtain Habitat Mapping for the Plan Area in order to identify these landscapes and habitats worthy of ongoing protection in advance of the next statutory plan.

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
New SEA policy recommendation based on EPA scoping submission.	<p>Policy AH 11: Habitats and Species It is the policy of the Council to fulfil the requirements of the Natural Habitats Regulations, SI 94 of 1997 as amended by in 1998 and 2005 and Wildlife Act where relevant and appropriate. The Council will ensure that an Appropriate Assessment is carried out for any proposed development likely to have a significant impact on proposed Natural Heritage Areas (pNHAs), Natural Heritage Areas (NHAs), Statutory Nature Reserves, Refuges for Fauna, Annex I habitats, or rare and threatened species including those species protected by law and their habitats. Ensure appropriate avoidance and mitigation measures are incorporated into development proposals as part of any ecological impact assessment and protect against invasive species.</p>	Section 7.2 and Policy AH 5 of draft Plan provides an overall objective for AA and protection of the Lower River Suir SAC.	<p>Section 7.2 and Policy AH 5 were also updated at Amendment stage in June 2013. Policy AH 5 as amended is outlined below and Section 7.2 has been amended as follows:</p> <p>7.2.1 Special Areas of Conservation</p> <p>...The maintenance of habitats and species at favourable conservation condition and the management of features of the landscape important for the ecological coherence of within this Natura 2000 site at favourable conservation condition is an objective of this plan and will contribute towards the overall maintenance of those habitats and species at national level....</p>
New SEA policy recommendation based on EPA scoping submission.	<p>Policy AH 12: Consultation The council will undertake consultation with the Inland Fisheries Ireland, the EPA, the National Parks and Wildlife Service or other agencies, as necessary when considering potential adverse effects on the environment of the plan area.</p>	As a matter of course consultation takes place with statutory bodies during the development management process.	<p>This following amendment was made to action AH 5 at amendment stage in June 2013 as follows:</p> <p>Policy AH 5: Lower River Suir</p> <p>It is the policy of the Council to maintain the habitats and species within the Lower River Suir SAC site at favourable conservation status. Appropriate assessment screening shall be undertaken with respect to any project(s) that may arise with potential to adversely impact on the Lower River Suir SAC in accordance with article 6 of the habitats directive and shall be carried out in consultation with the NPWS and other key stakeholders such as Inland Fisheries Ireland.</p>
New SEA policy recommendation based on EPA scoping submission.	<p>Policy AH 13: Fisheries It is the policy of the Council to ensure the protection of fisheries where appropriate.</p>	AA requirement deals with impact on fisheries. Therefore a separate policy not required.	No further changes.

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<p>New SEA policy recommendation based on EPA scoping submission.</p>	<p>Policy AH 14: Riverside The Council will make the best use of the river side location of the Clonmel Urban Area by improving the relationship between the built environment and watercourses in urban design terms and only developing town centre sites adjacent to watercourses subject to the outcome of detailed flood risk assessment and appropriate assessment. The Council will support enhancement of amenity spaces along the River Suir watercourse dependent upon clear demonstration that there will be no impact to the integrity of a Natura 2000 site in accordance with Article 6 of the Habitats Directive or significant adverse effects on other environmental receptors.</p>	<p>Section 7.3.1 of the draft Plan refers to the Riverside Amenity area. An 'Amenity' land use zoning objective exists and covers areas adjoining the River. Section 9 also addresses SEA and AA at project level.</p>	<p>Section 7.3.1 of the draft Plan which refers to Riverside Amenity was amended as follows at Amendment stage in June 2013.</p> <p>The River Suir has been a major influence on the town's development during its existence and it is the interaction between the built environment and the river which gives Clonmel its unique character. However, the full potential of the river as an amenity and recreational asset for the town has not been fully realised to date. The Council will actively pursue the further sustainable and appropriate development and improvement of existing green spaces within the Plan area prioritising Suir Island and the creation of links from Mulcahy Park, Suir Island, and Denis Burke Park. The improvement of the riverside walk along the River Suir Towpath is also a priority for the Council.</p>
<p>New SEA policy recommendation based on EPA scoping submission.</p>	<p>Policy AH 15: Green Infrastructure The council will provide for the long-term protection and improvement of the quality of the natural environment within the plan area and provide ecological and recreational linkages in order to enhance biodiversity, the conservation status of special habitats; air, water and soil quality as well as the amenity value of these areas.</p>	<p>See above Ref 7.3.1.</p>	<p>See above Ref 7.3.1.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>New SEA policy recommendation based on EPA scoping submission.</p>	<p>Policy AH 16: Implementation of Relevant Regulations It is the policy of the Council to implement of the requirements of the Drinking Water Regulations, Groundwater Regulations, Habitat Regulations, Surface Water Regulations, Urban Waste Water Discharge (Authorisation) Regulations and Waste Water Treatment Regulations.</p>	<p>A number of these regulations are referred to within the draft Plan. As standalone legislation, specific policies outside of their consideration in the preparation of the Plan including via the SFRA, SEA and AA are not considered necessary for inclusion.</p>	<p>No further change.</p>
<p>Specific Built and Natural Heritage, Amenity and Recreation Actions</p>			
<p>New SEA policy recommendation based on EPA scoping submission.</p>	<p>AH 9 The council will create an integrated and coherent green infrastructure network to enhance biodiversity and quality of life, provide for sustainable water management and a green setting for the urban area.</p>	<p>Section 7.3.1 of the draft Plan refers to the Riverside Amenity area. An 'Amenity' land use zoning objective exists and covers areas adjoining the River as well as elsewhere throughout the Plan area.</p>	<p>Section 7.3.1 of the draft Plan which refers to Riverside Amenity was amended as follows at Amendment stage in June 2013</p> <p>The River Suir has been a major influence on the town's development during its existence and it is the interaction between the built environment and the river which gives Clonmel its unique character. However, the full potential of the river as an amenity and recreational asset for the town has not been fully realised to date. The Council will actively pursue the further sustainable and appropriate development and improvement of existing green spaces within the Plan area prioritising Suir Island and the creation of links from Mulcahy Park, Suir Island, and Denis Burke Park. The improvement of the riverside walk along the River Suir Towpath is also a priority for the Council.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
Community and Social Facilities Policies			
<p>Parts of the Heywood Road site are located in Flood Zone B and therefore recommend that regard to the SFRA recommendations within this policy.</p> <p>There are protected trees located on this site and any proposed development should have regard to them.</p> <p>Recommend inclusion of text within policy outlining that any proposals on the Heywood Road site should be subject to a traffic management / mobility management plan.</p>	<p>Policy CS1: Education</p> <p>It is the policy of the Council to continue to work with education providers to service the town and its hinterland to attain the highest possible educational standards for its citizens. The expansion of existing educational facilities and the development of a new primary and secondary educational campus on lands north of the N24 at Heywood Road will be encouraged. Any proposed development on this site should have regard to the recommendations of the SFRA and will be subject a traffic management / mobility management plan will be an integral part of the proposal.</p>	<p>Section 9.6 of the draft Plan sets out that with regard to new development and Flood Risk, all proposals for new development must have regard to, and where necessary demonstrate compliance with, the Flood management & Mitigation Measures contained within the attached SFRA (Volume 2) and the River Suir CFRAM (when available) (See also Maps 5 & 5a). Detailed recommendation not yet included within draft Plan.</p>	<p>No further change.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>Detailed discussions took place as part of the alternatives assessment and resulting residential development strategy for the town. The sites selected within this development plan boundary will provide for 123 ha of the 153ha new residential development land required under the Core Strategy. An additional 30 ha was made available just outside the plan boundary area on lands zoned for new residential use within the administrative area of Waterford County Council. Recommend inclusion of text within Plan as follows: The Council will investigate the possibility of incorporating the environs of Clonmel within the Waterford County Council's administrative area into the next statutory plan for Clonmel.</p>	<p>Recommend inclusion of a new Section 8.10 with respect to Community and Social Actions as follows:</p> <p>The Council will investigate the possibility of incorporating the environs of Clonmel within the Waterford County Council's administrative area into the next statutory plan for Clonmel.</p>	<p>New text included within Section 8.9 of draft Plan as follows:</p> <p>'The Council will investigate the possibility of incorporating the environs of Clonmel within the Waterford County Council administrative area into the next statutory plan for Clonmel.'</p>	<p>No further change.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
Opportunity Sites – Design Briefs			
<p>Opportunity Site No. 1: Suir Island and former Clonmel Arms located at Sarsfield Street is located within the zone of archaeological potential and the northern strip of the Clonmel Arms site is partially located within the ACA and both sites contain a number of Protected Structures. Therefore recommend inclusion of text to ensure that any development on this site should be designed with due cognisance to the cultural heritage features located thereon and any proposals shall be subject to a detailed report prepared by an appropriately qualified person to ensure protection of cultural heritage features on site.</p> <p>Section C of opportunity site no. 1 Description: should note this relates to Clonmel Arms site specifically for clarification purposes.</p> <p>Given the strategic nature and size of the subject site and its location in close proximity to an SAC, recommend inclusion of text within design brief to set out that any proposed development on site will be subject to AA screening.</p> <p>Main recommendations of JBA Suir Island Justification test should be included within development brief for Suir Island and former Clonmel Arms site as follows:</p>	<p>Opportunity Site No. 1: Suir Island and former Clonmel Arms</p> <p>.....</p> <p>c) The Clonmel Arms site shall be redeveloped to include less vulnerable uses as a mixed use town centre scheme, with a high quality retail anchor unit with office and/or residential uses over on the upper floors.</p> <p>d) Suir Island shall be developed as the ‘Green Heart’ of the town through the provision of water compatible uses including with extensive formal and informal/natural garden areas, footpaths and views across the Suir subject to the protection of the existing habitats. The island is suitable for a dedicated urban sports and leisure complex/emporium and it is envisaged that this could cater for new indoor and outdoor sports and leisure activities for all ages.</p> <p>.....</p> <p>g) Any development on opportunity Site No. 1 shall have regard to the site specific issues set out in the accompanying SFRA as follows:</p> <ul style="list-style-type: none"> • ‘Refurbishment of existing development should be undertaken in such a way as to minimise flood risks, including change to a less vulnerable use and installation of property level protection measures. Water compatible uses may be allowed to complete the masterplanning of the site, and opportunities for environmental enhancement through natural and man-made parkland and amenity space should be sought. • Should new development be proposed for the island, it should be accompanied by a site scale detailed management plan, which would build upon the outputs of the flood relief scheme, but should also include an examination of hazard, velocity and time of inundation, and should propose suitable management and mitigation measures, along with an emergency plan in the event of defence failure. This will be informed by the CFRAM outputs as they become available. It is particularly important that the capability of blue-light services to manage the additional risks be addressed. Ideally, this management plan should be informed by a similar plan, or set of procedures, for the whole town. <p>h) Any development on this site should be designed with due cognisance to the cultural heritage features located thereon and any proposals shall be subject to a detailed report prepared by an appropriately qualified person.</p> <p>i) Any proposed development on site will be subject to AA screening.</p>	<p>Section 9.7 and 7.2 of draft Plan provides an overall objective for EIA and AA.</p> <p>Section 9.6 of the draft Plan sets out that with regard to new development and Flood Risk, all proposals for new development must have regard to, and where necessary demonstrate compliance with, the Flood management & Mitigation Measures contained within the attached SFRA (Volume 2) and the River Suir CFRAM (when available) (See also Maps 5 & 5a)..</p>	<p>The following further changes were made to Opportunity Site No. 1: Suir Island and former Clonmel Arms located at Sarsfield Street at amendment stage:</p> <p>... The potential for the development of a raised plaza along the quays with views overlooking the River Suir and Suir Island and the development of a raised pedestrian link along Sarsfield Street and across the River Suir should be considered and developed if feasible and subject to project level strategic environmental assessment and appropriate assessment screening. This approach would effectively link the Main Street with the amenity potential of Suir Island... Opportunity Site No. 1</p> <p>d) Suir Island shall be developed as the „Green Heart“ of the town with extensive formal and informal/natural garden areas, footpaths and views across the Suir subject to the protection of the existing habitats within the special area of conservation. The island is suitable for a dedicated urban sports and leisure complex/emporium and it is envisaged that this could cater for new indoor and outdoor sports and leisure activities for all ages.</p> <p>f) The development of the site shall incorporate car-parking especially at ground floor level with potential for access underneath raised footpath/plaza area. The development of Suir Island shall incorporate car-parking and coach parking at appropriate locations with easy access to the town centre via the proposed footbridge.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>Opportunity Site No. 2: Kickham Barracks has potential for negative impacts on Protected Structure on site. Recommend inclusion of text to ensure that any development on this site should be designed with due cognisance to the cultural heritage features located thereon and any proposals shall be subject to a detailed report prepared by an appropriately qualified person to ensure protection of cultural heritage features on site.</p> <p>As per the SFRA this site is located within flood zones A and B. Recommendations of JBA Suir Island Justification test of Kickham Barracks site (No. 5) should be included in Appendix 1, opportunity site no. 2 description.</p> <p>Given the strategic nature, size of the subject site and given its location close to an SAC, recommend that design brief should note that any proposed development on site will be subject to AA screening.</p>	<p>Opportunity Site No. 2: Kickham Barracks</p> <p>j) Any development on opportunity Site No. 2 shall have regard to the site specific issues set out in the accompanying SFRA as follows:</p> <ul style="list-style-type: none"> • Development across the site should be allocated sequentially, and within Flood Zone C, then B preferentially, but should not be so rigidly applied that development is constrained to unsustainable levels or does not deliver the mix of development type required. Flood Zone B is appropriate for less vulnerable uses (without working through the Justification Test), such as offices, eateries and education. • Flood risk to residential development can be managed, provided pre-development flood depths are less than 0.6m in the 1% AEP flood event, and the threshold levels can be raised above the 1% flood level. This is something that can be assessed at the development management stage of the site planning, and will be achievable in some parts (if not all) of Flood Zone B, and potentially in some parts of Flood Zone A. One of the requirements for the residential developments should be the availability of evacuation routes to higher ground, which means the front of the site would (probably) not be appropriate for residential uses – the site specific detailed FRA would show this. • An assessment of the impact of climate change on the development would also need to be undertaken, either through a Climate Change Adaptation Strategy for Clonmel, or on a site specific basis. <p>k) Any development on this site should be designed with due cognisance to the cultural heritage features located thereon and any proposals shall be subject to a detailed report prepared by an appropriately qualified person.</p> <p>l) Any proposed development on site will be subject to AA screening.</p>	<p>Section 9.7 and 7.2 of draft Plan provides an overall objective for EIA and AA.</p> <p>Section 9.6 of the draft Plan sets out that with regard to new development and Flood Risk, all proposals for new development must have regard to, and where necessary demonstrate compliance with, the Flood management & Mitigation Measures contained within the attached SFRA (Volume 2) and the River Suir CFRAM (when available) (See also Maps 5 & 5a).</p>	<p>No further changes.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>Opportunity site no. 3 includes proposals for a new vehicular bridge over the River Suir linking Davis Road and Coleville Road which could have potential impacts on the River Suir SAC. Recommend inclusion of location of this bridge in the design brief map. Design brief should note that any proposed development on site will be subject to AA screening.</p> <p>It is proposed to retain land use zoning of 'Commercial' from the C&EDP, 2008. The justification test prepared on this site as part of SFRA recommends that development at this site should be restricted to water compatible or less vulnerable uses as per the Strategic Area No. 3 description within the SFRA. Recommend inclusion of text to this effect - see adjacent.</p> <p>Recommendations of JBA Suir Island Justification test of Davis Road site (No. 3) should be included in Appendix 1, opportunity site no. 3 description – see adjacent text.</p>	<p>Opportunity Site No. 3: Davis Road The area is defined as a flood risk area, thus new development must have a low sensitivity should be restricted to water compatible or less vulnerable uses to reduce flood risk and not contribute to increased flood-risk elsewhere.</p> <p>Any proposal to develop strategic area number 3 shall illustrate how it is compatible with and can contribute to the delivery of the following Development Objectives:</p> <p>i) Any development on opportunity Site No. 3 shall have regard to the site specific issues set out in the accompanying SFRA set out as follows:</p> <ul style="list-style-type: none"> • Finished floor levels should be set at an initial minimum level which would equate to the 1 in 100 year level; this varies along the length of the site, so needs to be determined on a case by case basis. To reach this floor level, land raising would need to be carried out. As the area is behind defences (under normal operating conditions), compensatory storage would NOT need to be provided; nor would there be a requirement to include a freeboard allowance. • The masterplanning stage of development management should include by a site scale detailed flood risk assessment and management plan. The FRA must consider the impact of climate change and residual flood risk (including non-erection of demountables and overtopping of walls) and management of such risk, on a site specific level. • The FRA should build upon the outputs of the flood relief scheme, but should also include an examination of hazard, velocity and time of inundation, and should propose suitable management and mitigation measures, along with an emergency plan in the event of defence failure. It is important that this plan also considers the risk to other sites, and the management of same. Ideally, this management plan should be informed by a similar plan, or set of procedures, for the whole town. The plan should identify areas within the site of highest risk (for example, due to depth or speed of flooding), and should inform the allocation of development within the site based on vulnerability and hazard (rather than just flood extent). Appendix B of the Planning System and Flood Risk Management provides more guidance. • On the basis of this assessment, it may be determined that a lower finished floor level for non-residential use could be permitted, to a minimum of 600mm below the 1 in 100 year level. This would be the case if management of the residual flood risk was accepted by the developer, and the proposed development was based on flood resilient design. <p>j) Any proposed development on site will be subject to AA screening</p>	<p>Section 9.7 and 7.2 of draft Plan provides an overall objective for EIA and AA.</p> <p>Section 9.6 of the draft Plan sets out that with regard to new development and Flood Risk, all proposals for new development must have regard to, and where necessary demonstrate compliance with, the Flood management & Mitigation Measures contained within the attached SFRA (Volume 2) and the River Suir CFRAM (when available) (See also Maps 5 & 5a).</p>	<p>The following further changes were made to Opportunity Site No. 3 at Amendment Stage in June 2013:</p> <p>It is envisaged that the key accesses to the site will be via a new roundabout to serve Dunnes Stores, Barle Motors, Marriot Radiators and the calf mart/service station sites and via the existing roundabout at the Silversprings Road roundabout. In the interest of road traffic Figure A1:4 illustrates the primary access points to the Master Plan site.</p> <p>c) New development shall continue the building line established by the eastern end of the showgrounds, barlo motors and marriott radiators with staff and customer be set forward adjacent to the Davis Road and car-parking shall to be provided to the rear. The use of high quality and innovative design will be encouraged.</p>

Comment and Mitigation	Policies and Objectives (Recommended changes in RED)	Changes to Policies & Actions of Plan at Pre-Draft Plan Stage (in RED)	Changes to Policies & Actions of Plan at Amendment Stage (Green at Amendment Stage and Blue on Adoption)
<p>Opportunity Site No. 4: Fair Oaks Food Site design brief should note that any proposed development on site will be subject to AA screening.</p> <p>Recommendations of JBA Suir Island Justification test of Fair Oaks (No. 1) should be included in Appendix 1, opportunity site no. 4 description – see adjacent text.</p>	<p>Opportunity Site No. 4: Fair Oaks Food Site Any proposal to develop site number 4 shall illustrate how it is compatible with and can contribute to the delivery of the following Development Objectives:</p> <p>f) Any development on opportunity Site No. 1 shall have regard to the site specific issues set out in the accompanying SFRA as follows:</p> <ul style="list-style-type: none"> • <i>This is a site with some existing development. The majority of this site is within Flood Zone C with a very low (less than 0.1%) probability of flooding. The site boundary encroaches on Flood ones A and B. From a flood risk management point of view development at this site is appropriate, but following the principles of the Planning Guidelines, is best avoided in Flood Zone B where less vulnerable or water compatible uses, such as a green corridor or amenity strip, should be encouraged.</i> <p>g) Any proposed development on site will be subject to AA screening.</p>	<p>Section 9.7 and 7.2 of draft Plan provides an overall objective for EIA and AA.</p> <p>Section 9.6 of the draft Plan sets out that with regard to new development and Flood Risk, all proposals for new development must have regard to, and where necessary demonstrate compliance with, the Flood management & Mitigation Measures contained within the attached SFRA (Volume 2) and the River Suir CFRAM (when available) (See also Maps 5 & 5a)..</p>	<p>The following further changes were made to Opportunity Site No. 4 at Amendment Stage in June 2013:</p> <p>Any proposal for all or part of to develop opportunity site number 4 shall illustrate how it is compatible with and can contribute to the delivery of the following Development Objectives: Opportunity Site No. 4</p> <p>e) There is opportunity for new development to incorporate south facing views over the River Suir and the Comeragh Mountains. In this respect, an appropriately located riverside viewing area shall be provided such as a plaza, riverside promenade etc subject to appropriate assessment screening and the presence of breeding otters.</p> <p>f) Any development on opportunity Site No. 4 shall have regard to the site specific issues set out in the accompanying SFRA and be screened for appropriate assessment of potential effects on the Lower River Suir special area of conservation.</p>
<p>Opportunity Site No. 5: LIT Tipperary Campus design brief should note that any proposed development on site will be subject to AA screening.</p>	<p>Opportunity Site No. 5: LIT Tipperary Campus Any proposal to develop site number 5 shall illustrate how it is compatible with and can contribute to the delivery of the following Development Objectives to be set out in Framework Plan for the site for the agreement of Clonmel Borough Council:</p> <p>.....</p> <p>e) Any proposed development on site will be subject to AA screening.</p>	<p>Section 9.7 and 7.2 of draft Plan provides an overall objective for EIA and AA.</p>	<p>No further changes.</p>

2.5 Cumulative Assessment of the Plan

Cumulative effects were addressed in relation to a number of potential combined pressures and in particular the close proximity of the C&EDP to the Marlfield Local Area Plan (which was also undergoing a full review at the time of preparation of the C&EDP). The SEA identified that large scale developments such as key opportunity sites (Suir Island, Clonmel Arms, Davis Road, Fair Oaks and LIT Campus) within Clonmel, Clonmel Town centre development and an integrated tourism scheme proposed in Marlfield could have potential to have cumulative effects if developed.

The SEA identified however that through integration of these objectives with the provision of other protective policies within the C&EDP would be expected to reduce direct negative impacts on environmental receptors, such as water quality, resulting from pressure on these. Any new development would also be subject to conform to the development management requirements of the C&EDP and the South Tipperary CDP 2009.

2.6 Influence of AA on the Plan

The purpose of AA is to ensure that the C&EDP 2013 does not contain any policies or objectives that could lead to negative impacts on the integrity of an EU designated site. The AA process was undertaken in parallel with the Plan making process and the SEA.

An Appropriate Assessment of the draft C&EDP was carried out in parallel to the SEA process. The AA process ensured that environmental considerations, specifically focused on Natura 2000 sites, were integrated into the Plan as it was developed. Under the EU Habitats Directive, any plan or project not directly connected with or necessary to the management of Natura 2000 sites, namely, Special Areas of Conservation (SAC) or Special Protection Areas (SPA), but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subjected to an AA of its implications for the site in view of the site's conservation objectives.

The administrative area of the Clonmel and Environs Plan includes include the Lower River Suir SAC, an important site that forms part of the Natura 2000 network. The river flows through Clonmel town and parts of the southern environs.

Based on the AA screening of Natura 2000 sites, it was concluded that the proposed C&EDP had potential for significant effects on the Lower River Suir SAC and a Stage II AA was therefore undertaken. Initial reviews of the policies and objectives included in the C&EDP indicated that there was a risk of adverse effects on the integrity of the Lower River Suir SAC unless appropriate mitigation was included within the plan. Mitigation measures in the form of specific objectives and policies designed to protect the environment have been included within the plan in order to ensure compliance with the Habitats Directive Article 6 requirements by integrating measures for the protection of Natura 2000 sites into all policy areas covered by the Plan. On the basis of the findings of the Stage II AA, it was concluded that the C&EDP has fully integrated the findings of the AA throughout the policies and objectives of the Plan, and therefore the implementation of the C&EDP is not likely to have significant adverse effects upon the integrity of any Natura 2000 site within or adjacent to the C&EDP area.

All proposed amendments to the draft C&EDP as well as material amendments were subsequently screened during the draft plan and amendment stages of the process with regard to AA. All

amendments were screened out and no mitigation measures were proposed as a result of the screening process.

3. Consultation Process

3.1 Scoping – Consultation Stage

Detailed consultation has taken place with respect to the Strategic Environmental Assessment and Appropriate Assessment of the C&EDP.

It should be highlighted at the outset that transboundary consultation took place with Waterford County Council as part of this SEA as they are the Plan makers and are also the relevant planning authority for lands surrounding Clonmel Town, immediately to the south of the Plan area. Therefore the plan making team preparing the C&EDP were already fully informed of all pertinent issues relating to lands adjoining Clonmel Town and Environs within Co. Waterford.

The first stage of consultation took place when an initial SEA Scoping Issues Paper was issued to the following parties (including the five prescribed Environmental Authorities) on 8th December 2011, requesting submissions by 13th February 2012. During this time the Pre-Draft Public Consultation Period also took place. The EPA responded by letter dated 6th January 2012 enclosing the EPA's initial submission which consisted of an SEA Guidance document with respect to the C&EDP and SEA Pack dated 11th October 2011 as outlined in Appendix A.

1. Department of the Environment, Community and Local Government
2. Planning and Spatial Policy Section , Department of the Environment, Community and Local Government
3. Development Applications Unit, Department of Arts, Heritage and the Gaeltacht
4. An Bord Pleanála
5. County Development Board
6. South Eastern Regional Authority
7. Cork County Council
8. Waterford County Council
9. Limerick County Council
10. North Tipperary County Council
11. Kilkenny County Council
12. Department of Agriculture, Fisheries and Food
13. Department of Communications, Energy and Natural Resources
14. Department of Justice and Equality
15. Department of Defence
16. Department of Education and Skills
17. Department of Jobs, Enterprise and Innovation
18. Department of Tourism, Culture and Sport
19. Department of Transport, Tourism and Sport
20. Environmental Protection Agency
21. Failte Ireland
22. Inland Fisheries Ireland
23. The Arts Council
24. Electricity Supply Board
25. Forfas
26. Health Service Executive South East Region
27. The Heritage Council
28. Health & Safety Authority
29. National Roads Authority

30. An Taisce
31. National trust of Ireland
32. Office of Public Works
33. Dublin Airport Authority
34. South East Regional Assembly
35. Eirgrid
36. Head of Communications & Research Office of the Ombudsman

The second round of consultation relating to the SEA took place in December 2011 and related to the 'official' scoping consultation stage. A Scoping Report was compiled in April 2012 outlining the scope and level of detail proposed for the SEA Environmental Report and was issued to the five statutory environmental authorities as prescribed under the Planning and Development (SEA) Regulations 2004 (as amended) including:

- Environmental Protection Agency (EPA);
- Department of Environment, Community and Local Government (DECLG);
- Department of Agriculture, Food and the Marine (DAFM);
- Department of Communications, Energy and Natural Resources (DCENR); and
- Department of Arts, Heritage and the Gaeltacht (DAHG).

No responses from the statutory consultees were received during this stage of the consultation process.

3.2 Draft Plan and Sea Environmental Report - Consultation Stage

The draft Plan and SEA Environmental Report period of consultation took place between 12th October 2012 and 21st December 2012. At this stage, the draft C&EDP was placed on public display along with the SEA Environmental Report and associated Appropriate Assessment. A total of 43 no. submissions were received during this stage of the consultation process. Consultation responses included submissions from the environmental authorities as well as the public, other stakeholders and statutory consultees.

Submissions and observations made in relation to the draft Plan, SEA Environmental Report and AA broadly covered the following key topics:

- EU directives, national/regional legislation, guidelines and policies;
- Drinking water supply and conservation;
- Wastewater treatment and urban wastewater discharge licensing;
- Groundwater protection;
- Hydrometrics and integration of water infrastructure;
- Flood prevention and management;
- Habitat mapping;
- Waste management;
- Air, noise and climatic factors;
- Alien species and noxious weeds;
- Landscape character assessment;
- Energy conservation;

- Transport, tourism and infrastructure;
- Human health and quality of life; and
- Mapping and listing natural and cultural heritage;
- Land Use zonings.

Most of the submissions received related to specific aspects of the C&EDP itself and did not relate specifically to the SEA Environmental Report and Appropriate Assessment. Submissions were received from the EPA, Department of the Arts, Heritage and the Gaeltacht and the Department of Environment, Community and Local Government during this period of consultation and are provided in Appendix A of this report. Detailed responses to these submissions are provided within the S. 12(4) Manager's Report.

All submissions made to the draft Plan were reviewed by the SEA and AA Team. A S.12 (4) Manager's Report on the submissions/observations received during the public display period was prepared setting out the proposed amendment to the draft C&EDP. Each of the proposed amendments to the draft C&EDP were screened by the SEA and AA Team. Each amendment was assessed against the strategic environmental objectives of this SEA. An addendum to the Manager's Report was prepared documenting this process. An Appropriate Assessment Screening of the material alterations was also undertaken. The SEA and AA Screening of Amendments document for this stage in the process is provided in Appendix B of this report.

No significant impacts as a result of implementing the proposed amendments were identified as part of this SEA and AA Screening process and therefore no mitigation measures were proposed on this basis.

3.3 Amendments to the Draft Plan - Consultation Stage

The final period of consultation took place between 21st June 2013 and 22nd July 2013 when proposed material amendments to the draft Plan was placed on public display.

A total of 14 no. submissions / observations were submitted during this stage of the consultation process. Submissions were received from the public, landowners, statutory and environmental authorities.

Submissions and observations made at this stage broadly covered the following key topics:

- Consultation with the NPWS that neither SEA nor Habitats Directive Assessment is required for significant infrastructure projects.
- Proposed addition of specific structure(s) to the Record of Protected Structures (RPS).
- Proposed designation of a Master Plan.
- Land Zoning
- Flooding
- Developmental Potential of Lands

Only submissions that relate to proposed Material Amendments to the Draft Plan were considered at this stage. No significant impacts as a result of implementing the proposed amendments were identified as part of this SEA and AA Screening process and therefore no mitigation measures were proposed on this basis.

Submissions were received during this period of consultation from the EPA and the Department of the Environment, Community and Local Government and are provided in Appendix A of this report. Detailed responses to these submissions are provided within the s. 12(8) Managers' Report.

3.4 Adoption of Clonmel & Environs Development Plan 2013-2019

Following the consideration of the Draft Plan, proposed Material Alterations and the Manager's Report, the Plan (as amended) was presented to the Elected Members for adoption in October 2013 and came in to effect on 4th November 2013.

As per the s.12 (8) of the Manager's Report two amendments to the plan were proposed. These have been screened in respect of SEA and AA. This screening document is provided in Appendix B of this report. The Screening report in respect of this final stage of amendments recommended a further clarification in respect of one of the proposed amendments on the grounds that it would potentially allow residential development on all commercially zoned land in an unplanned manner. This clarification was not incorporated by the County Council in the development plan as adopted on the grounds that in practice most of the commercial lands could not become available for or developed for residential purposes in any case.

4. Reasons for Choosing the Preferred Alternative

In line with the requirements of the SEA Directive and the corresponding implementing Irish legislation (S.I. 436 of 2004), consideration was given to reasonable alternatives for delivery of the C&EDP. 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. Alternatives must be realistic and capable of implementation and should present a range of different approaches within the statutory and operational requirements of the development Plan. It is noted that a "Do Nothing" option was not explored, as this was not considered reasonable, given the legislative requirement to update the Development Plan.

It is a mandatory objective of a Development Plan that sufficient lands are zoned for particular purposes. This is especially relevant in relation to the quantum and location of new residentially zoned lands. In this regard it is important to highlight that the 'Core Strategy' prepared in respect of the C&EDP identified that 153 ha of residentially zoned lands are required in order to facilitate future population projections for the Plan area¹.

On this basis, twenty-four undeveloped sites located within the Plan area were identified and assessed with a view to finding the most suitable sites for the preferred future development scenario to accommodate growth within the town. Each site was then assessed on the basis of a number of planning² and environmental³ criteria in order to determine the most suitable sites for residential zoning going forward.

The relevant twenty-four sites chosen for inclusion within this alternative site assessment had previously been zoned for residential uses (either existing or proposed new residential development) in the past as part of the C&EDP 2008 before the Core Strategy for the Plan area was adopted as a variation to the Plan in 2011.

While twenty-four sites were examined individually, there were a number of strategic options for the direction of growth of the town set out as follows:

1. Zoning lands for residential development on town centre infill sites and adjacent areas
2. Zoning lands for residential development to the north and/or south of the town centre and built-up area to create a more consolidated urban form
3. Zoning lands for residential development to the west and/or east of the town in a linear pattern, taking into account the linear features of Clonmel such as the River Suir, railway line and N24.
4. A mixed approach using elements of the foregoing.

Generally, subject to site specific constraints, it was decided to zone lands for residential development based on Option 4. Within Option 4 the primary focus of proposed residentially zoned lands is to the north of the town and within and adjacent the town centre. This approach seeks to achieve a compact urban form that encourages sustainable transport modes, avoids areas susceptible to flooding, particularly along the River Suir and its tributaries, and makes the most sustainable linkages with compatible land uses. Some lands have been zoned to the south, west and east of the town, on the sites closest to the town centre in these directions.

It was decided in general not to zone lands for residential development at the extreme eastern and western ends of the town. Lands previously zoned for residential development or considered for same,

¹ 30 ha of residential zoned lands are located within the administrative area of Waterford County Council.

² Alternative sites have been chosen by the Plan makers inputs with respect to planning criteria assessment has been provided by the Council with inputs from the SEA team.

³ Each alternative site has been assessed based on SEA Environmental Objectives as set out in Chapter 5 of this ER.

to the east of the town in particular (including a number of sites to which access would not be improved by the provision of the proposed inner relief road), were generally found to be the most rural in character, the most divorced from the urban fabric of the town and town centre facilities and the least conducive to improving land-use/transport co-ordination and improved modal split towards sustainable transportation methods.

The lands recommended for residential zoning are predominantly those nearest the town centre sequentially and/or lying adjacent existing built up areas. The line of the proposed relief road could form a boundary to the north of the town but it is not considered appropriate to maintain zonings along the entire route for the reasons outlined in the preceding paragraph.

The chosen 'Option 4' allows more opportunities for future linkages between developed urban land parcels through encouraging development on appropriately shaped land plots which lie adjacent each other in suitably sized land banks, or that are adjacent existing or proposed compatible uses. Factors such as current planning permissions for residential development and individual site constraints have also been taken into account.

The chosen option seeks to avoid placing sensitive residential uses on lands susceptible to flooding. Any lands where Flood Zones encroach partially will be subject to Flood Risk Assessment should any proposals for development be put forward. Impacts on the Lower River Suir SAC and on the cultural heritage of the town have also informed the decisions on residential zoning.

5. Monitoring Measures

Article 10 of the SEA Directive (2001/42/EEC) 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 to be able to undertake appropriate remedial action”*. The primary purpose of monitoring is to cross-check significant environmental effects which arise during the implementation stage against those predicted during the plan preparation stage.

The Directive leaves considerable flexibility to Member States in deciding how monitoring shall be arranged, however it is generally agreed that a mixture of “quantitative and qualitative indicators are required. The Directive recognises that the monitoring does not necessarily require new research activity and that existing sources of information can be used. In addition monitoring can be used to identify any information gaps and/deficiencies that were identified as part of the SEA process. Furthermore, Government Guidelines state that monitoring should concentrate on the likely significant effects identified in the Environmental Report (former Department of Environment, Heritage and Local Government 2004).

Monitoring will be based around the SEA Environmental Objectives, Indicators and Targets. The Objectives, Indicators and Targets for the various environmental topics are set out below in **Table 5.1**. The Indicators chosen are at a level, which is relevant to the Plan and are collated and reported on by a variety of government agencies including EPA, NPWS and Archaeological Survey.

Monitoring proposals must concentrate on likely significant environmental effects, which have been identified in the Environmental Report and the measures identified as necessary to prevent, reduce, or offset any significant adverse effects. The indicators/monitoring will act as an early warning sign so that appropriate remedial action is undertaken.

Responsibilities and Frequency of Reporting

Monitoring as per Table 5.1 will be carried out on an annual basis. The statutory Manager’s Report on progress in achieving objectives of the Clonmel & Environs Development Plan 2013-20198, takes place two years after the adoption of the Plan and *“shall include information in relation to the progress on, and the results of monitoring the significant environmental effects of implementation of the plan”*. If an objective or policy is having a significant adverse effect, a variation may be considered during the lifetime of the plan. It is largely the responsibility of Clonmel Borough Council and South Tipperary County Council to undertake the monitoring and to interpret the monitoring data relevant to Clonmel Town and its environs.

Draft Objectives	Draft Targets	Draft Indicators	Source and availability
<p>Objective 1 Protect and where appropriate, enhance biodiversity, particularly protected areas and protected species</p>	<ul style="list-style-type: none"> • No net loss of designated sites, species or habitats • Prevent further spread of alien/invasive species • No net loss of green linkages / ecological networks 	<ul style="list-style-type: none"> • Reported/Estimated levels of damage to designated sites/species/habitats as identified by GIS and AA • No. of developments receiving planning permission within or on boundary of designated sites. • No. of Habitats Directive/appropriate assessments carried out. • Loss of area of land actively managed for conservation • Numbers sites reported to contain alien/invasive species • Loss of green linkages / ecological networks identified through GIS 	<ul style="list-style-type: none"> • NPWS Article 17 Report • Planning / Environment Department • NPWS, Inland Fisheries Ireland • Environment Department • Environment Department • GIS
<p>Objective 2 Improve people's quality of life based on high-quality residential, working and recreational environments and on sustainable transport</p>	<ul style="list-style-type: none"> • No increase in population above core strategy population targets • Appropriate mix of tenure (including social housing in new residential developments) • Increase access to public transport from households 	<ul style="list-style-type: none"> • % change in population based on core strategy targets based on RPG figures • % of private and social housing in new developments • % mix of tenures based on housing strategy requirements • Construction/improvement of footpaths/greenways/cycle infrastructure 	<ul style="list-style-type: none"> • CSO • Planning Department • Housing Department • Roads Department
<p>Objective 3 Protect and, where appropriate, enhance the function and quality of the soil resource in the plan area</p>	<ul style="list-style-type: none"> • Increase in number of derelict buildings and brownfield sites being redeveloped • Increase in remediation of contaminated lands 	<ul style="list-style-type: none"> • Number of derelict buildings and brownfield sites being redeveloped based on commencement notices • Number of remediation cases of contaminated lands 	<ul style="list-style-type: none"> • Commencement notices • Environment/ Waste Department

<p>Objective 4 Improve water quality and the management of watercourses to comply with the standards of the Water Framework Directive and incorporate the objectives of the Floods Directive into sustainable planning and development;</p>	<ul style="list-style-type: none"> • Implementation of the Programme of Measures identified under the SERBD River Basin Management Plan. • Ensure wastewater collection system capacity is provided either prior to construction of new development or is developed in parallel. 	<ul style="list-style-type: none"> • % increase in waters achieving 'good status' as defined in the WFD. • Wastewater collection system capacity compared with wastewater collection demand from development in the Town. 	<ul style="list-style-type: none"> • EPA • Environment Department • EPA • Environment Department
<p>Objective 5 Protect and, where appropriate, enhance the character, diversity and special qualities of cultural, architectural and archaeological heritage in the plan area;</p>	<ul style="list-style-type: none"> • No impact on the fabric or setting of monuments on the Record of Monuments and Places (RMP) by development granted planning permission. • No impacts on the architectural heritage value or setting of protected structures by development granted planning permission. • No protected structures to be demolished because of long term neglect and dereliction. 	<ul style="list-style-type: none"> • Number of monuments on the Record of Monuments and Places (RMP), adversely impacted by development granted planning permission. • Redevelopment of Protected Structures that were previously vacant. • Number of protected structures on the Register of Derelict Sites • Annual restoration works to take place to Town Walls 	<ul style="list-style-type: none"> • The Archaeological Survey monitoring programme, Ireland • Buildings at Risk Register, Heritage Council Ireland. • Planning Department • Buildings at Risk Register, Heritage Council Ireland. • Planning Department
<p>Objective 6 Contribute to mitigation of, and adaptation to, climate change and air quality issues.</p>	<ul style="list-style-type: none"> • All new development applications within areas at risk of flooding to submit a flood impact assessment. • Increase access by households to sustainable forms of 	<ul style="list-style-type: none"> • No of new development applications within areas at risk of flooding without flood impact assessment. • Passenger numbers • Funding allocated to 	<ul style="list-style-type: none"> • Planning Department • Planning Department

	transport, including bus and rail services.	improvement of walking and cycle facilities	<ul style="list-style-type: none"> Roads Department
Objective 7 Protect and, where appropriate, enhance the character, diversity and special qualities of landscapes in the plan area	<ul style="list-style-type: none"> No negative alteration to protected views. 	<ul style="list-style-type: none"> Number of visual impact assessments received as part of development proposals. No of buildings over 5 stories in height. 	<ul style="list-style-type: none"> Council Planning Department
Objective 8 Make best use of existing infrastructure and promote the sustainable development of new infrastructure	<ul style="list-style-type: none"> Maximise development potential within urban envelope in order to reduce pressure on outlying rural areas 	<ul style="list-style-type: none"> Increase in population within urban area. 	<ul style="list-style-type: none"> CSO GeoDirectory

Table 5.1 Monitoring and Reporting Programme as outlined in the SEA