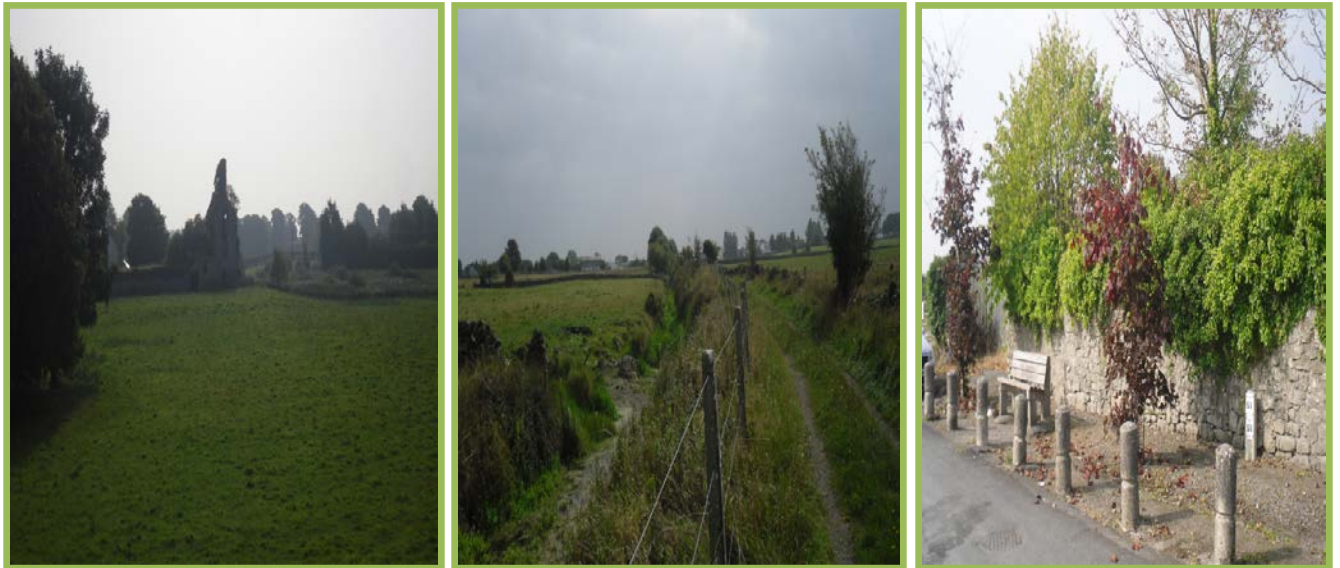


**Revised SEA STATEMENT
Of the
Headford Local Area Plan
2015-2021
Strategic Environmental Assessment**



December 2015
Forward Planning
Galway County Council
Áras an Chontae
Prospect Hill
Galway



**Comhairle Chontae na Gaillimhe
Galway County Council**

**The SEA Statement of The Headford Local Area Plan 2015-2021 as amended on
the 17th December 2015.**

Table of Contents

Section 1	3
Introduction	3
1.1 Terms of Reference	3
1.2 SEA Definition	3
1.3 Legislative Context	3
1.4 Content of the SEA Statement	3
1.5 Implications of SEA for the Local Area Plan	4
1.6 Ministerial Direction	4
Section 2	7
How Environmental Considerations were integrated into the	7
Local Area Plan	7
2.1 Consultations	7
2.2 Early Identification and Evaluation of Alternatives	7
2.3 Evaluation of the Policies and Objectives of the Draft Local Area Plan (January 2015)	7
2.4 Evaluation of the Material Alterations made to the Headford Local Area Plan (July 2015)	8
2.5 Conclusions	19
Section 3	20
Submissions & Observations Received Through Local Area Plan Process	20
3.1 Introduction	20
3.2 SEA Submissions	20
Section 4	25
Alternative Plan Scenarios Considered at Material Alteration Stage	25
4.1 Introduction	25
4.2 Description of the Alternative Scenarios	25
4.2.1. Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015) ..	25
4.2.2. Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015) with Further Minor Modifications	26
4.2.3. Adopt as per Draft Headford LAP 2015-2021 (January 2015)	26
4.2.4. Adopt as per Draft Headford LAP 2015-2021 (January 2015) with Further Minor Modifications	26
4.3. Assessment of Alternatives	26
4.3.1 Option 1 - Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015)	26

4.3.2	Option 2 – Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015) with Further Minor Modifications.....	27
4.3.3	Option 3 – Adopt as per Draft Headford LAP 2015-2021 (January 2015).....	27
4.3.4	Option 4 – Adopt as per Draft Headford LAP 2015-2021 (January 2015) with Further Minor Modifications	27
4.4	Assessment of the Environmental Implications of the Material Alterations to the Draft Headford Local Area Plan.....	27
4.5	Assessment of the Environmental Implications of the Further Modifications to the Material Alterations to the Draft Headford Local Area Plan (September 2015).....	28
4.6	Final Ministerial Direction.....	29
Section 5	31
Conclusions	31
5.1	Introduction	31
5.2	Future Amendments to the Headford Local Area Plan 2015-2021	31
5.3	Input of the SEA process on the preparation of the Headford Local Area Plan 2015-2021	31
Appendix A	32
	Final Ministerial Direction-Section 31 of the Planning and Development Act 2000, as amended- Decision to Issue a Direction relating to Headford Local Area Plan 2015-2021.....	32
Appendix B	32
	Strategic Environmental Assessment (SEA) of Further Modifications to the Material Alterations to the Draft Headford Local Area Plan made at the meeting of Galway County Council on the 28 th of September 2015.....	32
	Appropriate Assessment (AA) of Further Modifications to the Material Alterations to the Draft Headford Local Area Plan made at the meeting of Galway County Council on the 28 th of September 2015	32

Section 1

Introduction

1.1 Terms of Reference

This is the Strategic Environmental Assessment 'Statement' (*Updated January 2016*¹) for the Headford Local Area Plan 2015-2021 prepared in accordance with the requirements of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI 436 of 2004).

1.2 SEA Definition

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

1.3 Legislative Context

Directive 2001/42/EC of the European Parliament and of the Council of Ministers, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including land use planning. The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (SI No. 435 of 2004) and the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). Both sets of Regulations became operational on 21 July 2004. The SEA Directive and the instruments transposing it into Irish Law require that after the adoption of a plan or programme, the plan or programme making authority is required to make a Statement available to the public, the competent environmental authorities and, where relevant, neighbouring countries. This Statement is referred to as a SEA Statement (DEHLG, 2004)².

1.4 Content of the SEA Statement

The SEA Statement is required to include information summarising:

- a) How environmental considerations have been integrated into the Local Area Plan
- b) How:
 - the Environmental Report,
 - submissions and observations made to the planning authority on the proposed Local Area Plan and Environmental Report, and
 - any transboundary consultations

have been taken into account during the preparation of the Local Area Plan.

- c) The reasons for choosing the Local Area Plan as adopted, in the light of the other reasonable alternatives dealt with, and
- d) The measures decided upon to monitor the significant environmental effects of implementation of the Local Area Plan

¹ The SEA Statement has been revised and updated to reflect the Final Ministerial Direction which was received on the 17th December 2015. The Ministerial Direction is included in Appendix A at the end of this report.

² Department of the Environment, Heritage and Local Government (2004) Implementation of SEA Directive (2001/42/EC): Guidelines for Regional Authorities and Planning Authorities Dublin: Government of Ireland.

1.5 Implications of SEA for the Local Area Plan

As a result of the aforementioned legislation, the Headford Local Area Plan 2015-2021(January 2015) underwent a SEA screening which identified that there were no likely significant effects of the Draft Plan on the environment and, therefore, full SEA Report was not required.

The Draft LAP and the associated SEA Screening Report were placed on public display on Friday the 30th of January 2015 until Friday 13th March 2015. Further to the display of the Draft LAP the Elected Members and the Chief Executive resolved to make amendments to the LAP. On assessment of the proposed amendments, there were a number of amendments that were considered to be 'material' and therefore required to be placed on public display. The Material Alterations were screened for Appropriate Assessment and Strategic Environmental Assessment; the screening concluded that one or more of the material alterations required a full Appropriate Assessment and Strategic Environmental Assessment. It was determined that 8 weeks was required to complete these assessments and accordingly determined that the assessments would be completed on or before the 31st of July 2014.

The Material Alterations and the Environmental Assessments were placed on public display, which occurred from Friday the 24th July 2015 to Friday the 21st of August 2014. The purpose of the Environmental Report on the Material Alterations is to provide a clear understanding of the likely environmental consequences of adopting the said Material Alterations.

Following the consultation period on the proposed Material Alterations and associated Environmental Report and the receipt of submissions, the Chief Executive prepared his report. The Chief Executive Report was circulated to the elected Members on the 9th September 2015.

At the Council Meeting of the 28th September 2015 the Elected Members made a number of "Further Modifications" and these modifications were further assessed and it was determined that a number of the Material Alterations which were modified were not in accordance with an environmental led plan and a recommendation was made that they should revert back to the Draft Plan as published in January 2015.(The Strategic Environmental Assessment(SEA) and the Appropriate Assessment of Further Modifications to the Material Alterations to the Draft Headford Local Area Plan 2015-2021 made at the Galway County Council Meeting on the 28th September 2015 is attached for information purposes in Appendix B at the end of this document).

At each stage of the process the Elected Members took into account the findings of the SEA Screening Report, Strategic Environmental Assessment (SEA) Screening Report and Environmental Report for Material Alterations and Strategic Environmental Assessment (SEA) of Further Modification to the Material Alterations as appropriate.

1.6 Ministerial Direction

A Notice of Intent to Issue a Ministerial Direction was issued by the Minister of State for Housing and Planning and Co-Ordination of Construction 2020 on the 20th October 2015. The Notice and content of the Draft Ministerial Direction was on public display between Friday 30th October 2015 and 12th November 2015, and submissions and observations were invited.

Nine submissions/observations were received on the Draft Ministerial Direction. A Chief Executive's Report was prepared under Section 31 of the Planning and Development Act 2000(as amended) and was issued to the Minister on the 1st of December 2015.

Having considered the Chief Executives Report and recommendation as well as the written submissions and observations received on the notice of intent to issue a Ministerial Direction on the Draft Headford Local Area Plan 2015-2021, the Minister decided on the 17th December 2015 to issue a Final Direction for the Headford Local Area Plan as follows:

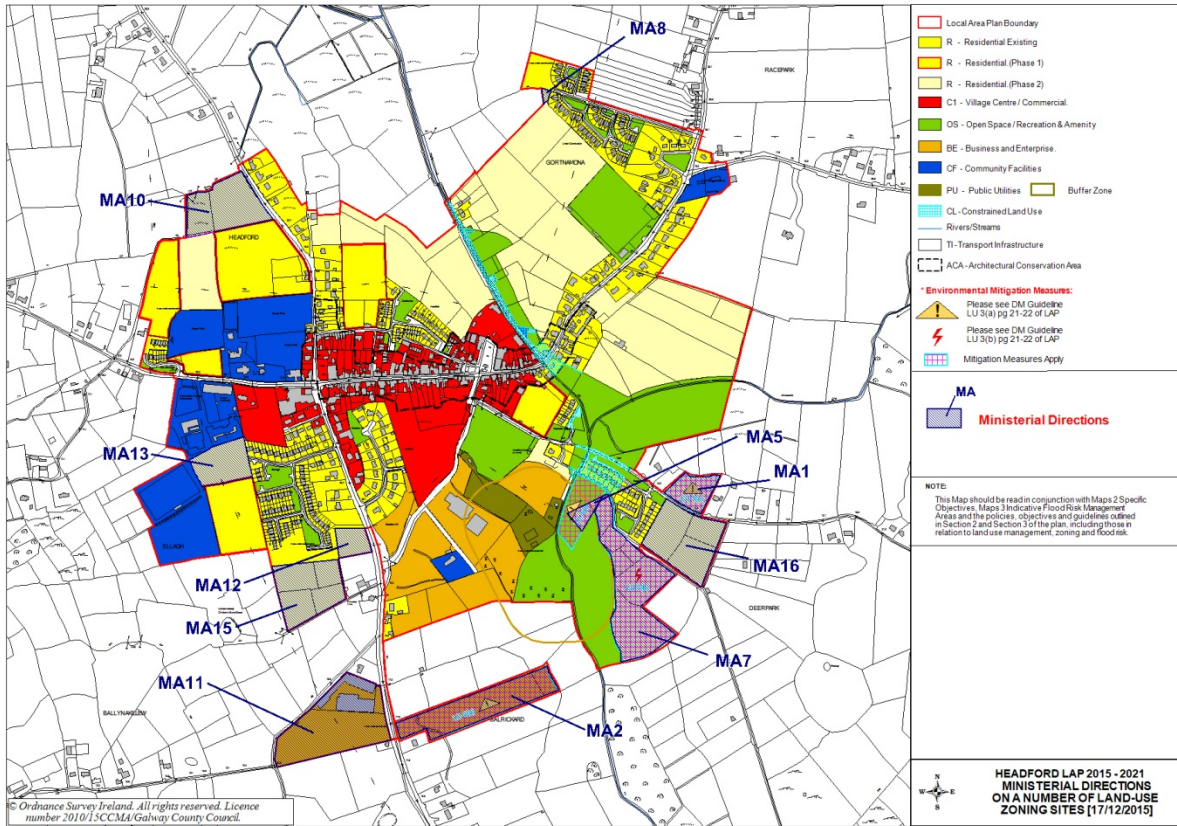
The following measures are required to be taken to comply with the Final Direction:

(a). The maps entitled Headford LAP 2015 - 2021 Map 1A /1B Land Use Zoning of October 2015 which sets out the zoning objectives for the town of Headford in the Headford Local Area Plan 2015-2021 is to be amended by taking account of the changes listed in the table below;

(b). The Local Area Plan boundary as shown in Map 1A, 1B, 2A and 3A is to be amended to reflect the changes listed above.

The following table illustrates the list of Material Alterations and the action that is required to implement the above measures.

MAAs	Adopted Plan	Final Plan as amended
	Current Zoning	Revert to
MA1	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA2	Business and Enterprise	No Zoning. Outside draft plan boundary
MA5	Residential (Phase 2)	Open Space / Recreation & Amenity
MA7	Residential (Phase 2)	Open Space / Recreation & Amenity
MA8	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA10	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA 11	Business and Enterprise	No Zoning. Outside draft plan boundary
MA12	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA13	Residential (Phase 2)	Community Facilities
MA15	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA16	Residential (Phase 2)	No Zoning. Outside draft plan boundary



This SEA Statement will reflect the implications of the Final Ministerial Direction and this document will be updated from that which was sent to the Environmental Authorities after the Headford Local Area Plan was adopted at the Galway County Council meeting of the 28th September 2015.

Section 2

How Environmental Considerations were integrated into the Local Area Plan

2.1 Consultations

A pre-draft screening report was sent to the Environmental Protection Agency (EPA), the Department of the Environment, Community and Local Government (DECLG), the Department of Communications, Energy and Natural Resources (DCENR), the Department of Agriculture, Fisheries and Food (DAFF) and the Department of the Arts, Heritage and the Gaeltacht (DAHG) indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the environmental report could be made to Galway County Council.

Galway County Council considered that at the draft stage (January 2015), the Headford LAP would have environmental implications but these were not likely to be significant in terms of the criteria set out in Schedule 2A of S.I No.436/2004 and therefore a Strategic Environmental Assessment Report was not deemed necessary.

After the period of public consultations on the draft plan stage, the Elected Members made a number of amendments which were considered to be 'material' and therefore required to be placed on public display. The Material Alterations were screened for Appropriate Assessment and Strategic Environmental Assessment; the screening concluded that one or more of the material alterations required a full Appropriate Assessment and Strategic Environmental Assessment.

Further information on the aforementioned submissions is provided under Section 3.2.

2.2 Early Identification and Evaluation of Alternatives

A range of alternative scenarios for the future development of the plan area were identified at an early stage in the process and evaluated for their likely significant environmental effects.

Communication of the findings of this evaluation helped the Plan-making team to make an informed choice as to which alternative was to be put before the Elected Members as the proposed Plan. Communication of this evaluation to the Elected Members through the SEA Screening Report helped the Elected Members to make an informed choice with regard to the making of the Local Area Plan.

2.3 Evaluation of the Policies and Objectives of the Draft Local Area Plan (January 2015)

Section 3 of the Local Area Plan was reviewed to ensure that the policies, objectives and Guidelines were assessed from an environmental perspective to ensure that there were sufficient mitigation measures in place to ensure that there were no adverse impacts on the environment. The following sections of the plan were examined in detail:

- Residential Development;
- Social and Community Development;
- Economic Development;
- Transportation Infrastructure;
- Utilities Infrastructure-Water, Water Supply, Climate Change, Flood Risk Management, Waste Management & Telecommunications;
- Built & Cultural Heritage;
- Natural Heritage & Biodiversity.

As part of reviewing each section listed, policies and objectives were carefully examined to ensure that the wording of these policies and objectives was sufficient to ensure that the local environment would be protected from potential adverse impacts. In addition to the analysis of the policies and objectives, there was an examination of the Habitats and Environmental Receptors associated with each land use zoning type. In this section each land use zoning proposed within the plan area was examined in detail to ensure the location of the zonings were in the most appropriate location and that there was sufficient policies and objectives (Namely Objective DS3 and DS4) to ensure that potential environmental issues are considered when development applications are present for these areas.

2.4 Evaluation of the Material Alterations made to the Headford Local Area Plan (July 2015)

The assessment of the Material Alterations was conducted in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004). The Screening of the proposed Material Alterations(MA1-MA23) to the Draft Plan was undertaken using specified criteria for determining the likely significant environmental impacts of a variation as set out in Schedule 2A of SEA Regulations (S.I. 435 of 2004).

As outlined in the previous SEA screening exercise for the Draft Plan, in some instances policies/objectives of the draft Plan, if taken in isolation, might be considered to give rise to significant affects on the environment. However throughout the plan there are policies and objectives which provide for the protection of the environment and therefore the plan should be considered it its entirety, including support documents.

The SEA Screening Report addressed potential effects of the Material Alterations to the Draft Headford LAP 2015-2021 having regard to the following criteria outlined as part of Schedule 2A of the SEA Regulations:

1. The area likely to be affected,
2. The probability, duration, frequency and reversibility of effects,
3. The cumulative nature of the effects,
4. The transboundary nature of the effects,
5. The risk to human health or the environment (e.g. due to accidents),
6. The magnitude and spatial extent of the effect (geographical area and size of the population likely to be affected),
7. The value and vulnerability of the area likely to be affected due to:
 - special natural characteristics or cultural heritage,
 - exceeded environmental quality standards or limit values, and
 - intensive land use, and
8. The effects on areas or landscapes, which have recognised National, European Union or International protection status.

As part of the Strategic Environmental Assessment (SEA) Screening Report & Environmental Report for Material Alterations to the Draft Plan 2015-2021, each of the material alterations (including re-zonings, new policies or amendments to policies and text) were examined under the criteria included as part of Schedule 2A of the SEA Regulations outlined above.

The Screening Report concluded that a SEA Environmental Report was required on seven of the Material Alterations proposed, as it was considered that the Material Alterations proposed would be likely to cause significant environmental effects. The remaining Material Alterations (MA8-23) have been screened out. Pursuant to Section 20(3)(f) of the Planning and Development Act 2000,as amended and having regard to the Planning and Development (Strategic Environmental Assessment Regulations) 2004 (as amended) and the content of the proposed Material Alterations to the Draft Plan, it was determined that having regard to the nature, extent and location of proposed Material Alterations and the potential for environmental impact that a SEA is required to be carried out in respect of these Material Alterations.

The scope of SEA Report was restricted by reason of Section 20(3)(f), which states that only an assessment “as respects one or more than one proposed material alteration” is required. It was therefore considered that in order to fully incorporate the proposed Material Alterations, cognisance was taken of the SEA Screening Report accompanying the Draft Headford Local Area Plan 2015-2021 and the SEA for the Galway County Development Plan 2015-2021.

All environmental parameters were considered in the context of preparing this SEA, however, given the restriction of the scope of the report as per Section 20(3) (f) of the Planning and Development Act 2000, (as amended), the following areas were examined. These included:

1. Water, and in particular, flooding,
2. Population, Human Health and Quality of Life,
3. Biodiversity, Flora and Fauna, and
4. Wastewater Treatment.

These topics were considered predominantly in relation to Material Alteration No. 1-7, however, a zone of influence outside this area was also considered to be important, owing to potential effects on flooding, water, habitats, etc. Further detail on the existing environment in relation to environmental parameters was provided in the SEA Screening for the Draft Headford Local Area Plan 2015-2021 (January 2015).

In determining the scale, location and distribution of zoned lands as per the Proposed Material Alterations to the Draft Plan – May 2015 there was no rationale provided by the Elected Members for the inclusion of the following changes in the land use:

- MA1-Include the lands within plan boundary and zone Residential Phase 2;
- MA2-Include the lands within plan boundary and zone Business & Enterprise;
- MA3-Zone subject lands located outside of the buffer zone area as Residential Phase 2;
- MA4-Rezone lands from Residential –Existing Residential (With Constrained Land Use) and Recreation, Amenity and Open Space to Residential Phase 2;
- MA5-Rezone lands from Recreation, Amenity and Open Space to Residential-Phase 2;
- MA6-Extend the plan boundary and zone all lands as Residential-Phase 2;
- MA7-Rezone the subject lands identified outside of the flood zone area as Residential –Phase 2

For the purpose of clarity Table 2.2 has been included from the Strategic Environmental Assessment (SEA) Screening Report & Environmental Report (July 2015) for Material Alterations to the Draft Plan 2015-2021 which examined the Material Alterations with the four environmental parameters outlined above.

Table 2.1 Assessment of Material Alteration No. 1-7				
Material Alteration No:	Water & Flooding	Population, Human Health and Quality of Life,	Biodiversity, Flora and Fauna	Wastewater Treatment
<p>MA 1 Include subject lands within the plan boundary and zone Residential–Phase 2 as per attached map (<i>Material Alterations Proposed to the Draft Plan – Map 1A Land Use Zoning - Draft Headford Local Area Plan</i>). Constrained Land Use applicable to the developed area of these lands.</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA are located in both “Extreme Vulnerability and High Vulnerability” area. The proposed plan area is underlain by the ‘Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of “poor”, however according to the EPA’s status of 2011 the “Clare-Corrib Groundwater-body has improved in status to “good”. Surface water quality in the area is variable with water bodies ranging from ‘Poor’ to ‘Good’ status.</p> <p>The Headford River,Tributary of Corrib (IE_WE_G_30_3484), has an overall status of “moderate”. The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the ‘Other Villages’ in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan.</p> <p>The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning.</p> <p>Appropriate zoning of lands which are located within areas identified as having the potential for future flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life.</p> <p>*See Table 2.3 in relation to</p>	<p>The Headford landscape reflects the underlying limestone bedrock in the area, productive agricultural land, turloughs and limestone pavement. Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn,Bird Cherry,Devils Bit Scabious,Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects. These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole,Hedgehog,Stoat,Mice and Pgymy Screw.</p>	<p>The Headford WWTP is an activated sludge treatment process and uses sequential batch reactors with phosphate reduction and tertiary filtration. The existing treatment has design capacity of 3,000 PE. Final effluent for the waste water treatment plant discharges to the primary discharge point at the Headford Stream via 600mm concrete pipe and non-return flap valve.</p> <p>Any development resulting from the rezoning of the lands in question to Residential Phase 2 -residential dwellings. This type of developments will likely result in production of associated wastewater thereby creating the potential for significant environmental effects within high risk flood zones, Flood Zone A/B.</p>

	<p>overall status of the river water body as “good” and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. The lands subject to this MA are located in both Flood Zone A & B.</p>	the increase/reduction of Land Use Zoning.		
<p>MA 2 Include the subject lands within the plan boundary and zone Business & Enterprise, as per attached Map 1A</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA are located in both “Extreme Vulnerability and High Vulnerability” area. The proposed plan area is underlain by the ‘Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of “poor”, however according to the EPA’s status of 2011 the “Clare-Corrib Groundwater-body has improved in status to “good Surface water quality in the area is variable with water bodies ranging from ‘Poor’ to ‘Good’ status.</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the ‘Other Villages’ in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan. The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning. Appropriate zoning of lands which are located within areas identified as having the potential for future</p>	<p>The Headford landscape reflects the underlying limestone bedrock in the area, productive agricultural land, turloughs and limestone pavement. Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn, Bird Cherry, Devils Bit Scabious, Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects. These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole, Hedgehog, Stoat, Mice</p>	<p>The Headford WWTP is an activated sludge treatment process and uses sequential batch reactors with phosphate reduction and tertiary filtration. The existing treatment has design capacity of 3,000 PE. Final effluent for the waste water treatment plant discharges to the primary discharge point at the Headford Stream via 600mm concrete pipe and non-return flap valve. Any development resulting from the rezoning of the lands in question to Business and Enterprise will likely result in production of associated wastewater thereby creating the</p>

	<p>The Headford River, Tributary of Corrib (IE_WE_G_30_3484), has an overall status of “moderate”. The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as “good” and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. The lands subject to this MA are located in Flood Zone A.</p>	<p>flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life. *See Table 2.3 in relation to the increase/reduction of Land Use Zoning.</p>	<p>and Pgymy Screw.</p>	<p>potential for significant environmental effects within high risk flood zone, Flood Zone A/B.</p>
<p>MA3 Zone subject lands located outside of the buffer zone area, as Residential Phase 2, as per attached Map 1A.</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA are located in both an “Extreme Vulnerability and High Vulnerability” area. The proposed plan area is underlain by the ‘Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the ‘Other Villages’ in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan.</p>	<p>The Headford Landscape reflects the underlying limestone bedrock in the area, productive agricultural land, turloughs and limestone pavement. Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn, Bird</p>	<p>The Headford WWTP is an activated sludge treatment process and uses sequential batch reactors with phosphate reduction and tertiary filtration. The existing treatment has design capacity of 3,000 PE. Final effluent for the waste water treatment plant discharges to the primary discharge point</p>

	<p>(2009) the river water-body had an overall status of “poor”, however according to the EPA’s status of 2011 the “Clare-Corrib Groundwater-body has improved in status to “good”.</p> <p>Surface water quality in the area is variable with water bodies ranging from ‘Poor’ to ‘Good’ status.</p> <p>The Headford River, Tributary of Corrib (IE_WE_G_30_3484), has an overall status of “moderate”. The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as “good” and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. A small parcel of these lands are located in a Flood Zone A.</p>	<p>The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning.</p> <p>Appropriate zoning of lands which are located within areas identified as having the potential for future flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life.</p> <p>*See Table 2.3 in relation to the increase/reduction of Land Use Zoning.</p>	<p>Cherry, Devils Bit Scabious, Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects. These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole, Hedgehog, Stoat, Mice and Pgymy Screw.</p> <p>The Annacurtra River (Headford River) transverses the subject lands. The catchment is primarily a spawning and nursery system for a diverse range of fish species. The fish population is mostly Brown Trout with small number</p>	<p>at the Headford Stream via 600mm concrete pipe and non-return flap valve.</p> <p>Any development resulting from the rezoning of the lands in question to Residential Phase 2 will likely result in production of associated wastewater, thereby creating the potential for significant environmental effects within high risk flood zone, Flood Zone A/B.</p>
MA 4	The EPA groundwater	The LAP area covers	Features of local	The Headford WWTP is

<p>Rezone lands from Residential-Existing (with Constrained Land Use) and Recreation, Amenity & Open Space to Residential Phase 2 (Constrained Land Use applicable to the developed area of these lands).</p>	<p>vulnerability maps illustrates that the lands under consideration for this MA are located in a “High Vulnerability” area. The proposed plan area is underlain by the ‘Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of “poor”, however according to the EPA’s status of 2011 the “Clare-Corrib Groundwater-body has improved in status to “good” Surface water quality in the area is variable with water bodies ranging from ‘Poor’ to ‘Good’ status.</p> <p>The Headford River,Tributary of Corrib (IE_WE_G_30_3484), has an overall status of “moderate”. The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as “good” and therefore there is an upward trend in the quality status. The overall</p>	<p>114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the ‘Other Villages’ in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan. The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning. Appropriate zoning of lands which are located within areas identified as having the potential for future flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life *See Table 2.3 in relation to the increase/reduction of Land Use Zoning.</p>	<p>biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn,Bird Cherry,Devils Bit Scabious,Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects. These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole,Hedgehog,Stoat,Mice and Pgymy Screw. The Annacurtra River (Headford River) transverses the subject lands. The catchment is primarily a spawning and nursery system for a diverse range of fish species. The fish population is mostly Brown Trout with small number</p>	<p>an activated sludge treatment process and uses sequential batch reactors with phosphate reduction and tertiary filtration. The existing treatment has a design capacity of 3,000 PE. Final effluent for the waste water treatment plant discharges to the primary discharge point at the Headford Stream via 600mm concrete pipe and non-return flap valve. Any development resulting from the rezoning of the lands and the removal of the Constrained Land Use to Existing Residential will likely result in production of associated wastewater, thereby creating the potential for significant environmental effects within high risk flood zone, Flood Zone A/B.</p>
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	<p>objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. The lands subject to this MA are located in Flood Zone A.</p>			
<p>MA 5 Rezone the lands from Recreation, Amenity and Open Space to Residential-Phase 2 as per attached Map 1A.</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA is located in a “High Vulnerability” area. The proposed plan area is underlain by ‘Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of “poor”, however according to the EPA’s status of 2011 the “Clare-Corrib Groundwater-body has improved in status to “good” Surface water quality in the area is variable with water bodies ranging from ‘Poor’ to ‘Good’ status.</p> <p>The Headford River,Tributary of Corrib (IE_WE_G_30_3484), has an overall status of</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the ‘Other Villages’ in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan.</p> <p>The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning. Appropriate zoning of lands which are located within areas identified as having the potential for future flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct</p>	<p>Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn,Bird Cherry,Devils Bit Scabious,Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects. These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole,Hedgehog,Stoat,Mice and Pgymy Screw. The Annacurtra River (Headford River) transverses the subject lands. The catchment is primarily a spawning and nursery system for a diverse range of fish species. The fish population is mostly Brown Trout with small number</p>	<p>Any development resulting from the rezoning of the lands in question to Residential Phase 2 will likely result in production of associated wastewater, thereby creating the potential for significant environmental effects within high risk flood zone, Flood Zone A/B.</p>

	<p>“moderate”. The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as “good” and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. The lands subject to this MA are located in Flood Zone A & B.</p>	<p>effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life. *See Table 2.3 in relation to the increase/reduction of Land Use Zoning.</p>		
<p>MA 6 Extend the plan boundary and zone lands as Residential-Phase 2 as per attached Map 1A.</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA are located in a “High Vulnerability” area. The proposed plan area is underlain by the ‘Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of “poor”, however according to the EPA’s status of 2011 the “Clare-Corrib Groundwater-body has improved in status to</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the ‘Other Villages’ in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan. The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-</p>	<p>Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn,Bird Cherry,Devils Bit Scabious,Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects. These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole,Hedgehog,Stoat,Mice</p>	<p>Any development resulting from the rezoning of the lands in question to Residential Phase 2 will likely result in production of associated wastewater thereby creating the potential for significant environmental effects within high risk flood zone, Flood Zone A/B.</p>

	<p>“good” Surface water quality in the area is variable with water bodies ranging from ‘Poor’ to ‘Good’ status.</p> <p>The Headford River, Tributary of Corrib (IE_WE_G_30_3484), has an overall status of “moderate”. The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as “good” and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. The lands subject to this MA are located in Flood Zone A.</p>	<p>2021 – Core Strategy and Spatial Planning. Appropriate zoning of lands which are located within areas identified as having the potential for future flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life.</p> <p>*See Table 2.3 in relation to the increase/reduction of Land Use Zoning.</p>	<p>and Pgymy Screw.</p>	
<p>MA 7 Rezone the subject lands identified outside of the flood zone area as Residential – Phase 2, as per attached Map 1A.</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA are located in predominately an area of “Extreme Vulnerability, with</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the ‘Other Villages’ in the Core</p>	<p>Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn, Bird</p>	

	<p>a small section of the lands in High Vulnerability” area. The proposed plan area is underlain by ‘Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of “poor”, however according to the EPA’s status of 2011 the “Clare-Corrib Groundwater-body has improved in status to “good” Surface water quality in the area is variable with water bodies ranging from ‘Poor’ to ‘Good’ status.</p> <p>The Headford River, Tributary of Corrib (IE_WE_G_30_3484), has an overall status of “moderate”. The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as “good” and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p>	<p>Strategy of the County development Plan and is located within the fifth tier of the Settlement Strategy of the plan. The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning. *See Table 2.3 in relation to the increase/reduction of Land Use Zoning.</p>	<p>Cherry, Devils Bit Scabious, Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects. These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole, Hedgehog, Stoat, Mice and Pgymy Screw. There are a number of mature Beech trees in the old demesne near the village and bats have been observed foraging along the lane by the demesne walls</p>	
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2.5 Conclusions

Material Alteration's No.1-7 has been assessed in accordance with SEA criteria and Schedule 2B of SEA Regulations 2004 (as amended).

These assessment criteria concluded:

- the environmental characteristics of areas likely to be significantly affected;
- any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to the Birds Directive or Habitats Directive;
- the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan.

Section 3

Submissions & Observations Received Through Local Area Plan Process

3.1 Introduction

This section of the SEA Statement details how the Pre-Draft Screening Report, Draft SEA Screening Report, Strategic Environmental Assessment (SEA) Screening Report and Environmental Report for Material Alterations and submissions and observations made to the planning authority on the SEA process/reports generally have been taken into account during the preparation of the Plan.

3.2 SEA Submissions

The Environmental Protection Agency (EPA), the Department of the Environment, Community and Local Government (DECLG), the Department of Communications, Energy and Natural Resources (DCENR), the Department of Agriculture, Fisheries and Food (DAFF), the Department of the Arts Heritage and the Gaeltacht (DAHG) were all sent Pre-Draft Screening Reports, indicating that submissions or observations in relation to the scope and level of detail of the information to be included in the SEA reports could be made to Galway County Council.

The following written submissions were received from the Environmental Authorities with specific reference to the Pre-Draft Screening Report, Draft SEA Screening and the Strategic Environmental Assessment Screening Report for Material Alterations (These submissions were summarised in the relevant Chief Executives Report's) The content of these submissions were taken into account in formulating the SEA Screening Report(January 2015) and Strategic Environmental Assessment (SEA) Screening Report & Environmental Report on Material Alterations(July 2015) and the preparation of the Local Area Plan.

Submissions on Pre Draft Strategic Environmental Assessment Screening Report	Comment
Department of Arts, Heritage & Gaeltacht (NPWS)	The Department notes the preliminary findings of the "Pre-Draft Strategic Environmental Assessment Screening Report" submitted for the plan. It is stated that the screening must be relevant to the draft plan itself and when it is prepared and must be relevant to and cover any amendments or material alterations that may be made at a later stage in the plan making process. It is noted by the Department that they have not yet seen the draft plan. It is noted that the Council previously confirmed that the plan will be subject to screening for appropriate assessment. It is stated that screening should be carried out in accordance with section 117U of the Planning and Development Act, 2000 (as amended) and should assess in view of the best scientific knowledge, if the proposed plan, on its own and in combination with other plans and projects is likely to have a significant effect on an European site. In addition screening should be carried out with respect to the conservation

	<p>objectives of relevant sites.</p> <p>There are no nature conservation sites in the plan area. However the Headford River and plan area drain towards the European sites, Lough Corrib cSAC and Lough Corrib SPA.</p> <p>It is noted that based on information currently available, the key concern relates to the existing pressures and future threats to water quality in the lake arising from the plan and the plan area. In this regard it is noted that the potential effects of the draft plan must be considered in combination with effects on water quality arising from other plans and projects in the catchment when screening.</p> <p>The Department reconfirms the previous advice that scientific analysis and reasoning underpinning the findings and decisions reached when screening (or in the Natura Impact Report) should be presented as should the necessary objective information.</p> <p>It is noted that two key elements of the SEA screening exercise relate directly to screening for appropriate assessment in this case. These are (1)The issue of the value and vulnerability of the area likely to be affected due to exceeded Environmental Quality Standards or limit values and (2)The issue of the effects on areas which have recognised European Union protection status.</p> <p>The response to the former is that (future) development proposals will be assessed as to their acceptability and will not be permitted if adequate treatment cannot be assured. The response to the later includes the following: the Headford River is classified as “moderate” ecological status and flows into Lough Corrib but “that the site is not considered to be highly vulnerable to impacts from the plan or development that arises from it”, subject to compliance with protective objectives from the County Development Plan and the new LAP</p> <p>The Department is concerned that these responses do not address the critical issues in relation to potential effects of the existing plan area and new draft plan on European sites. It is noted that these elements are pivotal to screening for appropriate assessment but are also important when screening for SEA.</p> <p>The Department remains of the view that there are potential risks that the plan on its own and in combination with other plans and projects could have significant effects on a European site in view of its conservation objectives and that an</p>
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	appropriate assessment is required. It is noted that this has potential consequences for the SEA screening exercise and at a minimum it is recommended that the responses to the two issues in the paragraph above should be given further consideration and revised.
Environmental Protection Agency	
	A specific comment made to the plan as follows: -Attention to the fact that the Radiological Protection Institute of Ireland has classified that area as a “High Radon Area” -The Western CFRAMS should be taken into account and integrated as appropriate into the plan and it should be ensured that water quality is protected in accordance with WFD Western River Basin District Management plan. -In terms of the protection of biodiversity, the plan should afford designated and undesignated sites (NHAs, Natura 2000 sites) and associated ecological corridors and linkages appropriate protection in the preparation of the plan.
Submissions on Draft Headford Local Area Plan	Comment
Department of Arts,Heritage and the Gaeltacht	The SEA screening process may not be concluded until it has been determined that the land use plan, individually or in combination with other plans and programmes, will not have a significant effects on a European site in view of its conservation objectives and it has been determined that an Appropriate Assessment is not required.
Environmental Protection Agency	The submission notes the Planning Authority’s determination in relation to the Screening for SEA in relation to the draft plan. It reminds Galway County Council of their obligations to determine whether or not any future proposed amendments/variations would likely have a significant effect on the environment, taking account of the SEA Regulations 2004, Schedule 2A Criteria, and also to the requirements of Article 6 of Council Directive 92/43/EEC on the conservation of natural habitats and of wild flora and fauna, and the Habitats Directive. The EPA also advises the Planning Authority to ensure that the policies and objectives of the plan are in accordance with those in the Galway County Development Plan 2015-2021, in particular Chapter 2 & Chapter 12 of the County Development Plan. The submission also notes that adequate infrastructure should be in place or required to be put in place to service any development proposed/authorised during the lifetime of the plan. Attention is directed the SEA Regulations including S.I. No. 201 of 2011, the DoEHLG Circular (PSSP 6/2011) in relation to ‘ <i>Further Transposition of the</i>

	<p><i>EU Directive 2011/42/EC on Strategic Environmental Assessment (SEA)</i> and the European Communities (Birds and National Habitats) Regulations 2011, all which should be referred to and integrated into the Plan.</p> <p>In relation to specific comments on the plan, the EPA highlight that Headford is classified as a high radon area and this should be taken into account in the development of the plan area.</p> <p>Finally, the submission notes the list of Environmental Authorities who are required to be consulted as part of the SEA process, as appropriate under S.I No. 201 of 2011.</p>
Submissions on the Material Alterations to the Draft Headford Local Area Plan	Comment
Department of Communications, Energy and Natural Resources on behalf of Geological Survey of Ireland	The submission states that the GSI agrees with the Recommendations of the Environmental Report for the Material Alterations to the Draft Headford Local Area Plan (2015-2021) and supports that Material Alterations (MA 1-7) should not be zoned/rezoned.
Environment Protection Agency	<p>The submission notes the Planning Authority's determination in relation to the Screening for SEA of the Material Alterations to the draft plan and the findings of the assessment in relation to MA1-MA7, where potential for likely significant effects have been identified.</p> <p>Specific comments on the alterations are as follows:</p> <ul style="list-style-type: none"> • Flood Risk Considerations: The EPA remind GCC that the material alterations should be set in the context of complying with the requirements of <i>The Planning System and Flood Risk Management Guidelines</i> and the proposed rezoning of MA1-MA6 should be reconsidered in this context. • Biodiversity Considerations: The submission notes the identified impacts associated with MA 7 and the EPA agrees with the SEA recommendation that the lands should be rezoned from the current proposed use in light of the assessment findings of the SEA. • Additional Zoning of Residential Phase 2 Lands: The submission notes the additional increase in R2 lands and considers that there are sufficient lands already zoned to meet the current and future residential development needs. It also states that the amount of R2 lands may need to be reconsidered, based on the amount of residential lands already zoned. It should also be ensured that development in the plan is linked to the availability and include commitments to provide

	<p>adequate and appropriate critical infrastructure in advance of development being granted.</p> <ul style="list-style-type: none">• Commitments to the requirements of the Habitats, SEA, WFD and Floods Directive should be, provided in relation to the developments that may arise out of the implementation of the amendments;• SEA Alternatives Considered <p>The submission acknowledges and concurs with the recommendations of the SEA regarding preferred option 3 being the most appropriate for the plan.</p> <ul style="list-style-type: none">• SEA Conclusions <p>The EPA acknowledges and supports the findings of the SEA Recommendations in relation to not proceeding with Material Alterations MA1-MA7 on environmental grounds.</p> <ul style="list-style-type: none">• Finally, the submission refers to the SEA Statement and outlines what the SEA statement should contain and requests that a copy is sent to any environmental authority consulted.
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Section 4

Alternative Plan Scenarios Considered at Material Alteration Stage

4.1 Introduction

This section describes the alternative scenarios considered at the Material Alterations Stage of the Draft Plan (July 2015). The Headford Local Area Plan that went on display in January 2015, Galway County Council determined that the plan as published did not require an Environmental Report and that a Strategic Environmental Assessment Screening sufficed. However as result of the amendments that the Elected Members made at the Council Meeting on the 27th May 2015 it was determined that some of these amendments were "Material Alterations" and that one or more of the Material Alterations required a full Strategic Environmental Assessment (as outlined in Section 3 above).

The issue of alternatives is a critical function of the SEA process and necessary to evaluate the likely environmental consequences of a range of alternative development strategies for the plan area, within the constraints imposed by environmental conditions. The SEA Statement is restricted by Section 20(3)(f) of the Planning and Development Act 2000, as amended which concentrates on 'Material Alterations' only, not the overall local area plan approach.

There were various options available to the Elected Members with regard to alternative approaches which could have been pursued, and it was these alternatives which will be analysed in line with the requirements of the SEA Directive and Regulations.

A 'Do Nothing' approach is not considered a reasonable and realistic approach as Galway County Council had determined a Strategic Environmental Assessment is required to be carried out in respect of the proposed Material Alterations to the Local Area Plan.

In accordance with the Planning and Development Act 2000, (as amended) the options available to the Elected Members, that were realistic and capable of implementation, included:

1. Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015),
2. Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015) with further minor modifications,
3. Adopt as per Draft Headford LAP 2015-2021 (January 2015), and
4. Adopt as per Draft Headford LAP 2015-2021 (January 2015) with further minor modifications.

4.2 Description of the Alternative Scenarios

4.2.1. Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015)

The Elected Members choose to adopt the Proposed Material Alterations to Draft Headford Local Area Plan 2015-2021, and associated SEA and AA. The Draft Headford Local Area Plan and Material Alterations as proposed at the Elected Members meeting of 27th May 2015 have been subject to SEA Screening. The Material Alterations, MA's 1-7, have been screened in for potential significant effects on the environment. Material Alteration No's.1-7 have been assessed under the criteria set out in Annex I of the SEA Directive and Schedule 2B to the Planning and Development (SEA) Regulations 2004 (as amended). Material Alteration No's 1-6 have been subject to the Justification Test as detailed in the *The Planning System and Flood Risk Management Guidelines for Planning Authorities and Circular PL2/2014* and **had failed** the Justification Test. Material Alteration No.7 is not in accordance with the proper planning and sustainable development of the plan area, as the removal of the Open Space/Recreation & Amenity zoning and the replacement with Residential Phase 2 has not been justified.

4.2.2. Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015) with Further Minor Modifications

The Elected Members choose to adopt the Proposed Material Alterations to the Draft Headford LAP 2015-2021, and associated SEA and HDA with further modifications.

The Draft Headford Local Area Plan 2015-2021 and Material Alterations as proposed at the Elected Members meeting of 27th May 2015 has been subject to SEA Screening. Material Alterations MA8-MA25 has been screened out for potential significant effects on the environment. However the rezoning of lands that are subject of **MA 1- MA 7 does not appear to follow an environmental-led approach and environmental criteria was not considered in the decision making process.** The overall impact of this alternative on the receiving environment cannot be fully assessed at this stage as the 'Minor Amendments' are a future consideration. It can be noted, however, that as a principal proposal, the zoning of the sites in relation to MA1-MA7 is not in compliance with proper planning and sustainable development of the plan area and in contravention of *The Planning System and Flood Risk Management Guidelines for Planning Authorities and associated Circular PL2/2014*. Thereby it is considered that by permitting development to occur in an ad-hoc and unrestrictive manner without regard for environmental sensitivities and constraints e.g. potential residential development with associated wastewater facilities within Flood Zone A/B could have a significant impact on the local environment.

4.2.3. Adopt as per Draft Headford LAP 2015-2021 (January 2015)

The Elected Members choose not to adopt the Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015), and associated SEA and HDA and revert back to the Draft Headford LAP 2015-2021 (January 2015). The Draft Headford LAP 2015-2021 was screened for SEA and it was determined that the potential for significant environmental effects did not exist. The development option seeks to support the consolidation of the village centre to accommodate future growth, promote the sequential development of the remainder of the urban core, including infill development and the development of vacant, brownfield and under-utilised sites in the village centre, ensuring that serviced lands close to the centre and public transport options are the primary focus for development in the short to medium term. Generally all undeveloped lands included in the Headford LAP area and within Flood Zones A and B were zoned for Open Space, Recreation and Amenity, and where lands that were developed and within Flood Zones A and B, a Constrained Land Use was applied as required under Circular PL2/2014. The plan as published in January 2015 with the zonings as outlined above were in compliance with the international, national, regional guidelines on the protection of water resources and the sustainable approach to land use planning. This plan is an environmentally led policy framework for the sustainable development of the Headford area.

4.2.4. Adopt as per Draft Headford LAP 2015-2021 (January 2015) with Further Minor Modifications

The Elected Members choose not to adopt the Proposed Material Alterations to the Draft Headford LAP 2015-2021 (May 2015), and associated SEA and HDA and revert back to the Draft Headford LAP 2015-2021 (January 2015) with further modifications. The overall impact of this alternative on the receiving environment cannot be fully assessed at this stage as the further modifications are a future consideration. It can be noted, however, that as a principal proposal, the Draft Headford Local Area Plan 2015-2021 (January 2015) is considered to be in compliance with proper planning and sustainable development with an overarching environmental-led approach.

4.3. Assessment of Alternatives

4.3.1 Option 1 - Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015)

This is the least desirable option, as the likely significant environmental effects on the receiving environment conflict with '*The Planning System and Flood Risk Management Guidelines for Planning Authorities*', *Circular PL2/2014* and SEA Screening of Headford LAP and are unlikely to be mitigated. This option envisages inappropriate lands i.e. lands classified as Flood Zone A/B for residential, business and enterprise development without taking into consideration environmental considerations. Consequently it is open for development associated with residential, business and enterprise to occur on lands which have

been classified in the highest flood risk category. This strategy would put unnecessary and undue pressure on lands which are environmentally sensitive, and it would cause undue negative impacts on a number of the environmental parameters. By adopting such an approach, which can be considered lacking in environmental planning considerations, the potential development of this area could occur in a manner which is not integrated; it would present significant environmental problems and would be contrary to the principles of sustainable development. This option would be contrary to the orderly and sustainable development of the plan area.

4.3.2 Option 2 – Adopt as per Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015) with Further Minor Modifications

It is unclear what the likely significant environmental effects on the environment will be as a result of the modifications. It can only be noted that the principal of the Proposed Material Alterations to Draft Headford LAP 2015-2021 (May 2015) without further modification would present significant environmental issues and would be contrary to the principles of sustainable development.

4.3.3 Option 3 – Adopt as per Draft Headford LAP 2015-2021 (January 2015)

This option allows for planned development and represents a sustainable environmental-led approach to planning in the Headford LAP area. Development will be focused in areas with capacity to accommodate development without causing significant environment effects. Significant restrictions will be put in place to development in areas designated for environmental purposes as well as areas of significant environmental importance or where threats to natural resources prevail, such as ground and surface waters. This scenario is based on the principles of sustainable development, which means that the plan is promoted in accordance with international, national, regional and county guidelines and the plan area is also covered by the objectives and policies of the *Galway County Development Plan 2015-2021* and the mitigation measures proposed in this plan. In conclusion, this environmental-led planned approach to development of the area incorporating the principles of sustainable development is the option best suited to Headford.

4.3.4 Option 4 – Adopt as per Draft Headford LAP 2015-2021 (January 2015) with Further Minor Modifications

It is unclear what the likely significant environmental effects on the environment will be as a result of the modifications. It can only be noted that the principal Draft Headford LAP 2015-2021 without amendments represents the optimum strategy for the development of the plan area taking in to account the requirement to zone a sufficient quantum of land to meet population growth targets and taking in to account the requirement to have a balance between diverse social, economic, and physical criteria. The Draft Headford Local Area Plan (January 2015) reflects the consideration of issues such as flood risk assessment, availability of services, sequential testing, planning history, and consolidation of the urban form.

4.4 Assessment of the Environmental Implications of the Material Alterations to the Draft Headford Local Area Plan

The proposed Material Alterations (MA1-MA7) were subject to SEA in accordance with Section 20(3)(f) of the Planning and Development Act 2000, as amended and the Planning and Development (Strategic Environmental Assessment Regulations) 2004 (as amended).

In this regard, the SEA process has identified that to facilitate Material Alteration No's. 1-7, as per the Proposed Material Alterations to the Draft Headford Local Area Plan 2015-2021, would result in a segregated and haphazard approach to sequential planning, and result in the potential for significant adverse environmental effects. These effects included the potential for likely significant environmental effects on local hydrology/hydrogeology, water quality, human health and biodiversity, as outlined in table 2.1.

It was clear from what has been outlined in the Strategic Environmental Assessment (SEA) Screening Report & Environmental Report for Material Alterations (July 2015) that the Material Alterations (MA1-7) were not in accordance with an environmental led plan and the following table was the clear

recommendation of the report that the plan should revert back to the land use zonings as published as part of the Draft Headford Local Area Plan 2015-2021 in January 2015.

Material Alteration	SEA Recommendation
MA1	Lands should not be included within the plan boundary and zoned Residential Phase 2. Revert back to the Draft Plan as published in January 2015.
MA2	Lands should not be included within the plan boundary and zoned Business and Enterprise. Revert back to the Draft Plan as published in January 2015.
MA3	Lands should not be re-zoned from Open Space/Recreation & Amenity to Residential Phase 2. Revert back to the Draft Plan as published in January 2015 and retain the zoning Residential Phase 2 & Open Space/Recreation & Amenity.
MA4	Lands should not be rezoned from Existing Residential (with Constrained Land Use) and Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.
MA5	Lands should not be rezoned from Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.
MA6	Lands should not be included within the plan boundary and zoned Residential Phase 2. Revert back to the Draft Plan as published in January 2015.
MA7	Lands should not be rezoned from Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.

4.5 Assessment of the Environmental Implications of the Further Modifications to the Material Alterations to the Draft Headford Local Area Plan (September 2015)

At the Council Meeting of the 28th September 2015, the Elected Members made a number of further modifications to the Material Alterations. In the course of the meeting these were further assessed from an SEA and AA perspective (Documents attached in Appendix B).

The removal of lands located within Flood Zones A and B from the plan boundary in the lands subject to Material Alterations 1, 2 and 5 would reduce the risk of environmental impacts due to impacts associated with flood events however there are still concerns regarding the remaining lands within these sites and potential impact on local biodiversity, flora and fauna. Therefore it is recommended that the lands subject to these Material Alterations would revert back to the Draft plan as published in January 2015.

Material Alteration No.3 and 4 have reverted back to the Draft Local Area Plan as published in January 2015 and Material Alteration No 6 has been removed from the plan boundary. These can now be screened out as they will not pose a significant environmental risk. However there are a number of Material Alterations (MA1, MA2, MA5 & MA7) that are not in accordance with an environmental led plan and the following table illustrates that the plan should revert back to the land use zonings as published as part of the Draft Headford Local Area Plan 2015-2021 in January 2015.

Material Alteration	SEA Recommendation
MA1	Lands should not be included within the plan boundary and zoned Residential Phase 2. Revert back to the Draft Plan as published in January 2015.
MA2	Lands should not be included within the plan boundary and zoned Business and Enterprise. Revert back to the Draft Plan as published in January 2015.
MA5	Lands should not be rezoned from Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.
MA7	Lands should not be rezoned from Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.

The Members decided to adopt the Material Alterations to the Headford Local Area Plan with some modification as outlined above with mitigation measures on a number of sites which was outlined in the

document “Appropriate Assessment of Further Modifications to the Material Alterations to the Draft Headford Local Area Plan 2015-2021” (Document attached in Appendix B) on sites relating to MA1, MA2, MA5 & MA7. The recommendation of the document “The Strategic Environmental Assessment (SEA) to the further Modifications to the Material Alterations to the Draft Headford Local Area Plan 2015-2021” (Document attached in Appendix A) made at the Council meeting of Galway County Council on the 28th of September 2015 has not changed and the sites should revert back to the Draft Plan as published in January 2015.

4.6 Final Ministerial Direction

As outlined in Section 1.6 the Headford Local Area Plan 2015-2021 was subject to a Final Ministerial Direction which was received by the Planning Authority on the 17th of December 2015. A number of the sites which formed part of the Ministerial Direction were also sites that the SEA had recommended should revert back to the Draft Plan. For the purpose of clarity the table contained in section 4.5 of this document is replicated with an additional column illustrating the Final Ministerial Direction.

There are a number of additional sites (MA8, 10, MA11, MA12, MA13, MA15 and MA16) which have also been amended to reflect that of the Draft Plan as published in January 2015.

Material Alteration	SEA Recommendation	Final Ministerial Direction
MA1	Lands should not be included within the plan boundary and zoned Residential Phase 2. Revert back to the Draft Plan as published in January 2015.	Site Removed. Revert Back to Draft Plan as published in January 2015.
MA2	Lands should not be included within the plan boundary and zoned Business and Enterprise. Revert back to the Draft Plan as published in January 2015.	Site Removed. Revert Back to Draft Plan as published in January 2015.
MA5	Lands should not be rezoned from Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.	Revert to Recreation, Amenity and Open Space as per Draft Plan as published in January 2015.
MA7	Lands should not be rezoned from Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.	Revert to Recreation, Amenity and Open Space as per Draft Plan as published in January 2015.
Additional Sites that have also been amended as a result of Final Ministerial Direction		
Material Alteration		Final Ministerial Direction
MA8	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA10	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA11	Business and Enterprise	No Zoning. Outside draft plan boundary
MA12	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA13	Residential (Phase 2)	Revert to Community Facilities as per Draft Plan as published in January 2015.
MA15	Residential (Phase 2)	No Zoning. Outside draft plan boundary
MA16	Residential (Phase 2)	No Zoning. Outside draft plan boundary

The evaluation of alternatives carried out in section 4.2 and 4.3 of this report illustrated that the preferred alternative was to revert to the Draft Plan as published in January 2015. The overall net effect of the Ministerial Direction correlates with that of the SEA evaluation and recommendation outlined in section 4.2 and 4.3. The Ministerial Direction allows for the planned development and represents a sustainable environmental-led approach to planning in the Headford LAP area. Development will be focused in areas with capacity to accommodate development without causing significant environment effects. Significant restrictions will be put in place for development in areas designated for environmental purposes as well as areas of significant environmental importance or where threats to natural resources prevail, such as ground and surface waters. The plan as finalised with the Ministerial Direction is based on the principles of sustainable development, which means that the plan is promoted in accordance with international, national, regional and county guidelines and the plan area is also covered by the objectives and policies of the *Galway County Development Plan 2015-2021* and the mitigation measures proposed in this plan.

Section 5

Conclusions

5.1 Introduction

As outlined in this document, The Draft Headford Local Area Plan 2015-2021 as published in January 2015, the SEA Screening Report identified that there was not a likely significant effects to the Draft Plan on the environment and, therefore a Strategic Environmental Report was not required. However as a result of the Material Alterations that was made by the elected Member's at the Council meeting in May 2015, it was determined that one, or more of these Material Alterations required an Environmental Report to be completed. At the Council meeting of the 28th September 2015, the Elected Members made a number of further modifications and these were assessed from a SEA/AA perspective (Documents attached in Appendix B) prior to the final adoption of the Headford Local Area Plan 2015-2021. These assessments were conveyed to the elected Members prior to the plan being adopted.

It should be noted that there is no other guidance in the Planning and Development Act 2000, (as amended) or the SEA Regulations (as amended) which direct the preparation of an SEA Statement on Proposed Material Alterations to a Local Area Plan. It should also be noted that the 2004 Regulations do not easily align with the requirements of the Planning and Development Act regarding 'modifications' to the Draft Plan. As outlined previously, Section 20(3) (f) of the Planning and Development Act 2000, as amended states that

"The planning authority shall determine if a strategic environmental assessment or an appropriate assessment or both such assessments, as the case may be, is or are required to be carried out as respects one or more than one proposed material alteration to the draft local area plan".

The SEA Environmental Report on the Material Alterations was carried out in accordance with Section 20(3) (f) of the Planning and Development Act 2000 and this report reflects the content and implications of the Final Ministerial Direction.

As already outlined in section 1.6 and 4.6 of this report the Headford Local Area Plan was subject to a Final Ministerial Direction which was received on the 17th December 2015, the evaluation and preferred alternative as recommended by the SEA at the Material Alteration and the further Modification stage (See Appendix B) was to revert back to the Draft Plan. In effect the Ministerial Direction correlates with that of these SEA recommendations. The plan is now very similar to that of the Draft Plan as published in January 2015 in which it was determined at that stage that the plan would have environmental implications but these were not likely to be significant in terms of the criteria set out in Schedule 2 A of S.I No.436/2004 and therefore a Strategic Environmental Report was not deemed necessary.

5.2 Future Amendments to the Headford Local Area Plan 2015-2021

It should be pointed out that any future amendments/variations to the Headford Local Area Plan 2015-2021 will require a SEA Screening to fully assess the amendments to ensure that no likely significant effects on the environment would occur as a result of the proposed amendment/variation.

5.3 Input of the SEA process on the preparation of the Headford Local Area Plan 2015-2021

The Strategic Environmental Reports prepared (SEA Screening, SEA Determination on the Material Alterations & The Strategic Environmental Assessment of Further Modifications to the Material Alterations) have given a valuable environmental input into the preparation of the Headford Local Area Plan 2015-2021. Throughout the process the recommendations of the SEA was conveyed to the plan making team and to the Elected Members which allowed an informed decision to be made in the preparation of the plan.

Appendix A

Final Ministerial Direction-Section 31 of the Planning and Development Act 2000, as amended- Decision to Issue a Direction relating to Headford Local Area Plan 2015-2021

Appendix B

Strategic Environmental Assessment (SEA) of Further Modifications to the Material Alterations to the Draft Headford Local Area Plan made at the meeting of Galway County Council on the 28th of September 2015

Appropriate Assessment (AA) of Further Modifications to the Material Alterations to the Draft Headford Local Area Plan made at the meeting of Galway County Council on the 28th of September 2015

Appendix A

DIRECTION IN THE MATTER OF SECTION 31 OF THE PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED BY S.21 OF THE PLANNING AND DEVELOPMENT (AMENDMENT) ACT 2010)

HEADFORD LOCAL AREA PLAN 2015-2021 DIRECTION 2015

“Local Area Plan” means the Headford Local Area Plan 2015-2021

“The Planning Authority” means Galway County Council

WHEREAS the functions of the Minister for the Environment, Community and Local Government under the Planning and Development Acts 2000 to 2014, other than Chapter 1 of Part VI of the Planning and Development Act 2000, have been delegated to the Minister of State at the Department of the Environment, Community and Local Government pursuant to the Environment, Community and Local Government (Delegation of Ministerial Functions) Order 2014 (S.I. 524 of 2014).

WHEREAS the Minister of State at the Department of the Environment, Community and Local Government is, for the reasons set out in the Statement of Reasons hereto, of the Opinion that

- (i) Galway County Council in making the Headford Local Area Plan 2015-2021 has ignored or has not taken sufficient account of the submissions made by the Minister for the Environment, Community and Local Government in August 2015,

and

- (ii) the Headford Local Area Plan 2015-2021 is not in compliance with the requirements of s.19, s.20 and s.28 of the Planning and Development Act 2000 (as amended).

NOW, THEREFORE in exercise of the powers conferred on him by s.31 of the Planning and Development Act 2000 (as amended), the Minister of State at the Department of the Environment, Community and Local Government hereby directs as follows:

- (1) This Direction may be cited as the Planning and Development (Headford Local Area Plan 2015-2021) Direction 2015.
- (2) The County Council Galway County is hereby directed to take the following steps with regard to the Headford Local Area Plan 2015-2021 (“the Local Area Plan”).
 - i. The map entitled Headford LAP 2015 – 2021 Map 1A Land Use Zoning of October 2015 which sets out the zoning objectives for the town of Headford in the Headford Local Area Plan 2015-2021 is to be amended by:
 - a. Removing the zoning objective for lands zoned Residential (Phase 2) as part of the adopted material alterations, namely part of MA1, MA5, MA8 and the entirety of MA7, MA10, MA12 – MA13 and MA15 – MA16. For ease of reference the Department has superimposed the specific lands on to adopted Map 1A Land Use Zoning Map. Refer to Map in Appendix 1, the blue outline and hatching identifies Residential (Phase 2) to be removed and the green outline and hatching identifies the Business & Enterprise zoning to be removed.

and

Reverting to the zoning objectives on these specific land parcels as per Headford LAP 2015 – 2021 Draft Map 1A entitled “Land Use Zoning” of the Draft Headford Local Area Plan 2015-2021 (published January 2015) as set out in the table below. The effect of this amendment will be that the zoning objective for the lands outlined in blue and green hatching will revert to the zoning objective as *per* the map included in the draft Headford Local Area Plan 2015-2021 of January 2015. The Draft Headford LAP Map 1A Land Use Zoning is attached at Appendix 2 for ease of reference.

In addition Map 1B of the Headford Local Area Plan 2015-2021 is to be amended to reflect the above amendments.

The Local Area Plan boundary as shown in Map 1A, 1B, 2A and 3A is to be amended to reflect the above amendments.

MA's	Adopted Plan	Draft Plan (Published January 2015)
	Current Zoning	Revert to
MA1	Residential (Phase 2)	No Zoning. Outside draft plan boundary.
MA2	Business and Enterprise	No Zoning. Outside draft plan boundary.
MA5	Residential (Phase 2)	Open Space / Recreation & Amenity
MA7	Residential (Phase 2)	Open Space / Recreation & Amenity
MA8	Residential (Phase 2)	No Zoning. Outside draft plan boundary.
MA10	Residential (Phase 2)	No Zoning. Outside draft plan boundary.
MA11	Business and Enterprise	No Zoning. Outside draft plan boundary.
MA12	Residential (Phase 2)	No Zoning. Outside draft plan boundary.
MA13	Residential (Phase 2)	Community Facilities
MA15	Residential (Phase 2)	No Zoning. Outside draft plan boundary.
MA16	Residential (Phase 2)	No Zoning. Outside draft plan boundary.

STATEMENT OF REASONS

- 1) A written submission on the on the proposed material alterations to the draft Headford local area plan was made to Galway County Council on behalf of the Minister for the Environment, Community and Local Government in August 2015.

The submission identified three significant issues of concern as regards compliance of the local area plan with the Galway County Development Plan 2015 - 2021, the Planning Act and certain guidelines published by the Minister under Section 28 of the Act. The Planning Authority was asked to reconsider these and uphold the alignment of the Headford Local Area Plan with the planning authority's own Galway County Development Plan.

The Planning Authority was advised that failure to address the issues satisfactorily in line with its statutory and policy responsibilities could result in the Minister using the powers available to him under the Planning and Development Act to ensure that the relevant statutory and policy requirements are upheld.

Despite this, on 28 September 2015, the Elected Members voted by resolution to adopt 11 of the proposed Material Alterations, as previously placed on public display.

Additional allocation of phase 2 residential zoned land

Nine of the material amendments adopted, namely, MA1, MA5, MA7, MA8, MA10, MA12, MA13, MA15 and MA16 provide for additional zoning of land for residential phase 2 development (approx. 12ha). This additional residential phase 2 zoning constitutes excessive zoning of land for housing and is inconsistent with the core strategy of the County Development Plan and contrary to Section 19(2) of the Planning Act as regards a local area plan being consistent with the objectives of the development plan, its core strategy and regional planning guidelines.

Additional allocation of Business & Enterprise (B&E) zoned land

Two land parcels totaling 7.02ha were zoned for B&E in the material alterations of the Draft Headford Plan. These lands are disconnected and disjointed from the main zonings of the rest of the town.

Material amendments MA2 and MA11 were deemed not to be in compliance with Section 6.3(b) of the Planning Guidelines on Sustainable Urban Development because they constitute 'leapfrogging' and would not support the orderly development of Headford. Accordingly, the Department recommended that these Material Alterations were not adopted and that the Plan should revert back to the Draft Plan as published in January 2015.

In conclusion, the additional land zoned for Residential (phase 2) by way of material alterations, namely part of MA1, MA5, MA8 and the entirety of MA7, MA10, MA12 – MA13 and MA15 – MA16 is not consistent with the Galway County Development Plan 2015 – 2021 Core Strategy statutory and policy requirements relating to the Headford Local Area Plan at both national and local levels which would have significant adverse

implications for this town and its current and future inhabitants. Significantly, the infrastructure requirements of such additional development as regards public services, does not appear to have been factored in to the decision to materially amend the local area plan.

Also the additional allocation of Business & Enterprise (B&E) zoned land by way of material alterations, namely part of MA2 and the entirety of MA11 is not in compliance with Section 6.3(b) of the Planning Guidelines on Sustainable Urban Development.

In light of the above the Minister is of the opinion that the Planning Authority has ignored, or has not taken sufficient account of the said written submission, in that the Planning Authority proceeded to adopt a policy objective which would be inconsistent with national Government policy (Galway County Development Plan Core Strategy, the Regional Planning Guidelines, National Spatial Strategy and National policy statutory guidelines).

- 2) The decision by the members to alter the policy in regard to the zoning objectives as outlined in this direction do not provide for proper planning and sustainable development and therefore the Headford Local Area Plan 2015-2021 is not in compliance with the requirements of s.19, s.20 and s.28 of the Planning and Development Act 2000 (as amended).

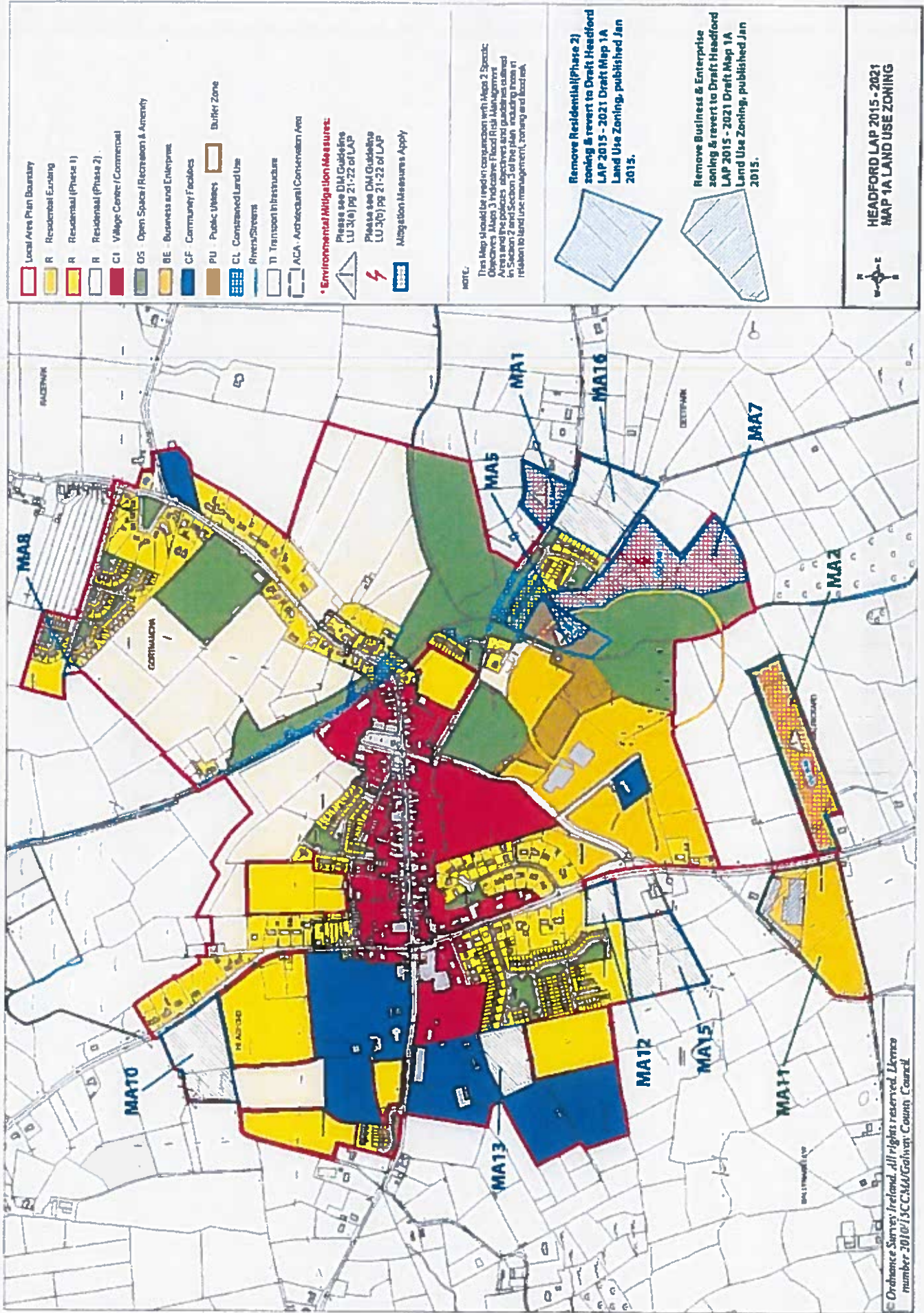
GIVEN under my hand,



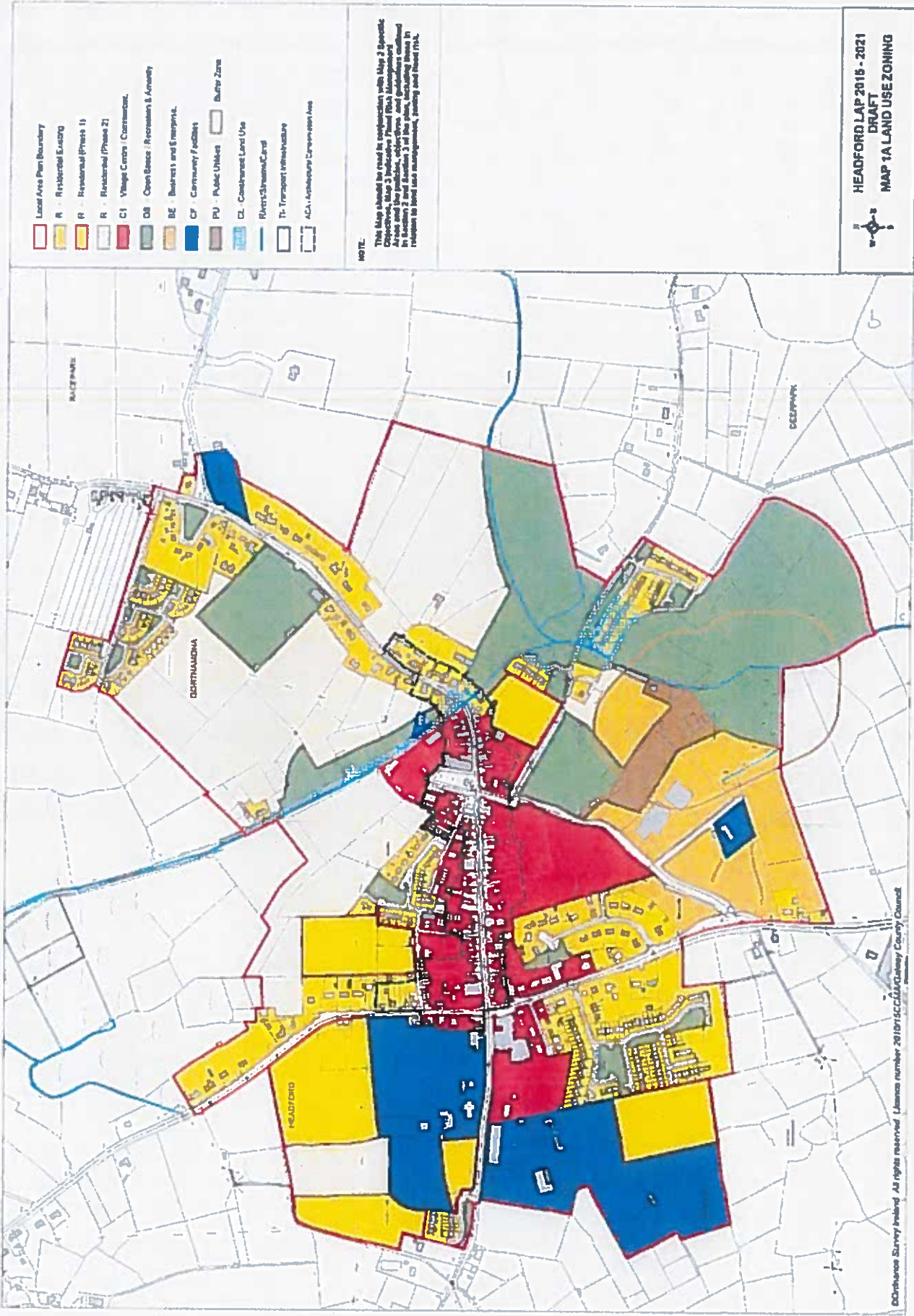
Minister for Housing, Planning and
Co-ordination of Construction 2020

this 17th day of December 2015.

APPENDIX 1



APPENDIX 2



Appendix B

Strategic Environmental Assessment (SEA) of Further Modification to the Material Alterations to the Draft Headford Local Area Plan made at the meeting of Galway County Council on the 28th September 2015.

Introduction

The modifications made to the proposed material alterations to the Headford Local Area Plan 2015-2021 at the meeting today (28th September 2015) of Galway County Council are considered in the view of the Strategic Environmental Assessment of the material alterations which was carried out in July 2015. The Table 1.1 has examined the Material Alterations (MA1, MA2, MA5 & MA7) with the four environmental parameters that were contained in the Environmental Report(July 2015). Table 1.2 illustrates the nett increase/decrease in zoned lands.

Table 1.1 Assessment of Further Modifications to Material Alteration No. 1,2,5 & 7

Material Alteration(July 2015)	Further Modification to Material Alteration-Galway County Council Meeting 28-9-15	Water & Flooding	Population, Human Health and Quality of Life,	Biodiversity, Flora and Fauna	Wastewater Treatment
<p>MA 1 Include subject lands within the plan boundary and zone Residential-Phase 2 as per attached map (Material Alterations Proposed to the Draft Plan – Map 1A Land Use Zoning - Draft Headford Local Area Plan). Constrained Land Use applicable to the developed area of these lands.</p>	<p>MA1 Remove parcel of land with the existing house from the plan boundary and retain zoning as per the MA (Residential Phase 2) on the remaining land.</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA are located in both "Extreme Vulnerability and High Vulnerability" area.</p> <p>The proposed plan area is underlain by the 'Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of "poor", however according to the EPA's status of 2011 the "Clare-Corrib Groundwater-body has improved in status to "good".</p> <p>Surface water quality in the area is variable with water bodies ranging from 'Poor' to 'Good' status.</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the 'Other Villages' in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan.</p> <p>The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning.</p> <p>Appropriate zoning of lands which are located within areas identified as having the potential for future flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life.</p> <p>*See Table 1.2 in relation to the increase/reduction of Land Use Zoning.</p>	<p>The Headford landscape reflects the underlying limestone bedrock in the area, productive agricultural land, turloughs and limestone pavement.</p> <p>Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn,Bird Cherry,Devils Bit Scabious,Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects.</p> <p>These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole,Hedgehog,Stoat,Mice and Pgymy Screw.</p>	<p>The Headford WWTP is an activated sludge treatment process and uses sequential batch reactors with phosphate reduction and tertiary filtration. The existing treatment has design capacity of 3,000 PE. Final effluent for the waste water treatment plant discharges to the primary discharge point at the Headford Stream via 600mm concrete pipe and non-return flap valve.</p> <p>Any development resulting from the rezoning of the lands in question to Residential Phase 2 -residential dwellings. This type of developments will likely result in production of associated wastewater thereby creating the potential for significant environmental effects adjacent to high risk flood zones, Flood Zone A/B.</p>

		<p>The Headford River, Tributary of Corrib (IE_WE_G_30_34 84), has an overall status of "moderate". The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as "good" and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. A section of the lands originally in the MA were located in both Flood Zone A & B. However as a result of the further modification these lands were removed from the plan boundary and the remaining lands retained</p>			
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		their zoning as Residential Phase 2.			
MA 2 Include the subject lands within the plan boundary and zone Business & Enterprise, as per attached Map 1A	MA2 Remove parcel of land from the plan boundary that are located in Flood Zone A & B and retain zoning of B & E on the remaining land.	The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA are located in both "Extreme Vulnerability and High Vulnerability" area. The proposed plan area is underlain by the 'Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of "poor", however according to the EPA's status of 2011 the "Clare-Corrib Groundwater-body has improved in status to "good" Surface water quality in the area is variable with water bodies ranging from 'Poor' to 'Good' status.	The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the 'Other Villages' in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan. The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning. Appropriate zoning of lands which are located within areas identified as having the potential for future flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life. *See Table 1.2 in relation to the increase/reduction of Land Use Zoning.	The Headford landscape reflects the underlying limestone bedrock in the area, productive agricultural land, turloughs and limestone pavement. Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn,Bird Cherry,Devils Bit Scabious,Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects. These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole,Hedgehog,Stoat,Mice and Pgymy Screw.	The Headford WWTP is an activated sludge treatment process and uses sequential batch reactors with phosphate reduction and tertiary filtration. The existing treatment has design capacity of 3,000 PE. Final effluent for the waste water treatment plant discharges to the primary discharge point at the Headford Stream via 600mm concrete pipe and non-return flap valve. Any development resulting from the rezoning of the lands in question to Business and Enterprise will likely result in production of associated wastewater thereby creating the potential for significant environmental effects adjacent to high risk flood zone, Flood Zone A/B.

		<p>The Headford River, Tributary of Corrib (IE_WE_G_30_34 84), has an overall status of "moderate". The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as "good" and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. A section of the lands originally in the MA were located in both Flood Zone A & B. However as a result of the further modification these lands were removed from the plan boundary and the remaining lands retained their zoning as Business &</p>			
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		Enterprise.			
<p>MA 5 Rezone the lands from Recreation, Amenity and Open Space to Residential-Phase 2 as per attached Map 1A.</p>	<p>MA5 Remove parcel of land from the plan boundary that are located in Flood Zone A & B and retain Residential Phase 2 on the remaining land.</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA is located in a "High Vulnerability" area.</p> <p>The proposed plan area is underlain by 'Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of "poor", however according to the EPA's status of 2011 the "Clare-Corrib Groundwater-body has improved in status to "good"</p> <p>Surface water quality in the area is variable with water bodies ranging from 'Poor' to 'Good' status.</p> <p>The Headford River, Tributary of Corrib (IE_WE_G_30_34 84), has an overall</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the 'Other Villages' in the Core Strategy of the County Development Plan and is located within the fifth tier of the Settlement Strategy of the plan.</p> <p>The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning.</p> <p>Appropriate zoning of lands which are located within areas identified as having the potential for future flooding i.e. Flood Zones A and B, is an essential element of the Local Area Plan as these lands have the potential for direct effects on flooding regimes in the locality with potential for interrelationships and knock on effects on water quality, human health, housing and quality of life.</p> <p>*See Table 1.2 in relation to the increase/reduction of Land Use Zoning.</p>	<p>Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn, Bird Cherry, Devils Bit Scabious, Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects.</p> <p>These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole, Hedgehog, Stoat, Mice and Pgymy Screw.</p> <p>The Annacurtra River (Headford River) transverses the subject lands. The catchment is primarily a spawning and nursery system for a diverse range of fish species. The fish population is mostly Brown Trout with small number</p>	<p>Any development resulting from the rezoning of the lands in question to Residential Phase 2 will likely result in production of associated wastewater, thereby creating the potential for significant environmental effects adjacent to high risk flood zone, Flood Zone A/B.</p>

		<p>status of "moderate". The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as "good" and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p> <p>A Stage 2 SFRA was carried out as part of the preparation of the Headford Local Area Plan. A section of the lands originally in the MA were located in both Flood Zone A & B. However as a result of the further modification these lands were removed from the plan boundary, and the remaining lands retained their zoning as Residential Phase 2.</p>			
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<p>MA 7 Rezone the subject lands identified outside of the flood zone area as Residential – Phase 2, as per attached Map 1A.</p>	<p>MA7 Retain the zoning as per the Material Alterations</p>	<p>The EPA groundwater vulnerability maps illustrates that the lands under consideration for this MA are located in predominately an area of “Extreme Vulnerability, with a small section of the lands in High Vulnerability” area.</p> <p>The proposed plan area is underlain by ‘Clare-Corrib Ground Water-body (IE_WE_G_0020). According to the Water Framework Directive (2009) the river water-body had an overall status of “poor”, however according to the EPA’s status of 2011 the “Clare-Corrib Groundwater-body has improved in status to “good”</p> <p>Surface water quality in the area is variable with water bodies ranging from ‘Poor’ to ‘Good’ status.</p>	<p>The LAP area covers 114.13ha, and according to the 2011 census contains a population of 889 persons. Headford has been identified as one of the ‘Other Villages’ in the Core Strategy of the County development Plan and is located within the fifth tier of the Settlement Strategy of the plan.</p> <p>The quantum of lands zoned in the Draft Headford Local Area Plan 2015-2021 is in compliance with the population targets as set out in the Galway County Development Plan 2015-2021 – Core Strategy and Spatial Planning.</p> <p>*See Table 1.2 in relation to the increase/reduction of Land Use Zoning.</p>	<p>Features of local biodiversity importance include hedgerows and grassy verges which support trees, shrubs and wildflowers such as Ash, Hawthorn, Bird Cherry, Devils Bit Scabious, Ladies Smock and Bush Vetch which provide food and shelter for a variety of invertebrates and pollinating insects.</p> <p>These habitats are also important feeding and nesting sites for birds and small mammals including Bank Vole, Hedgehog, Stoat, Mice and Pgymy Screw.</p> <p>There are a number of mature Beech trees in the old demesne near the village and bats have been observed foraging along the lane by the demesne walls</p>	

		<p>The Headford River, Tributary of Corrib (IE_WE_G_30_34 84), has an overall status of "moderate". The River was at risk of not achieving good ecological or good chemical status/potential by 2015. The latest status in 2011(EPA) has the overall status of the river water body as "good" and therefore there is an upward trend in the quality status. The overall objective is to restore the status of the river, by 2021.</p>			
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Table: 1.2 Indicating the quantum of Land Use increased/decreased.

Material Alterations	Land Use Zoning as per Draft Plan	Land Use Zoning as per Material Alterations	Land Use Zoning as per Further Modification to Material Alterations	Nett increase/decrease in land use zoning
MA1	Outside Plan Boundary	Phase 2 Residential	Parcel of land susceptible to flooding removed from Plan Boundary and the remainder of site zoned Residential Phase 2	+0.7873ha
MA2	Outside Plan Boundary	Business & Enterprise	Parcel of land susceptible to flooding removed from Plan Boundary and the remainder of site zoned Business and Enterprise	+3.58ha-0.932ha=+2.654ha

MA5	Recreation, Amenity & Open Space	Phase 2 Residential		+0.9934ha-0.7573ha=+0.2361ha
MA7	Recreation, Amenity & Open Space	Partly Rezoned to Phase 2 Residential		+3.457ha

Table1.2 Indicating the quantum of Land Use increased/decreased.

Key: Areas highlighted in **Blue** are areas of land zoned R2 or B&E within flood zone A/B which has now been removed.

The removal of lands located within Flood Zones A and B from the plan boundary in the lands subject to Material Alterations 1, 2 and 5 will reduce the risk of environmental impacts due to impacts associated with flood events however there are still concerns regarding the remaining lands within these sites to the potential impact on local biodiversity, flora and fauna. Therefore it is recommended that the lands subject to these Material Alterations would revert back to the Draft plan as published in January 2015. Material Alteration No.3 and 4 has reverted back to the Draft Local Area Plan as published in January 2015 and Material Alteration No 6 has been removed from the plan boundary. These can now be screened out as the subject lands will no longer be zoned for development.

Recommendation

It is clear from what has been outlined in the previous report(July 2015) and the further Modifications that have been made at the Galway Council Meeting today the 28th of September 2015 that the Material Alterations (MA1,MA2,MA5 & MA7) are not in accordance with an environmental led plan and the following table is the clear recommendation of this report that the plan should revert back to the land use zonings as published as part of the Draft Headford Local Area Plan 2015-2021 in January 2015.

Material Alteration	SEA Recommendation of the 28 th September 2015
MA1	Lands should not be included within the plan boundary and zoned Residential Phase 2. Revert back to the Draft Plan as published in January 2015.
MA2	Lands should not be included within the plan boundary and zoned Business and Enterprise. Revert back to the Draft Plan as published in January 2015.
MA5	Lands should not be rezoned from Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.
MA7	Lands should not be rezoned from Recreation, Amenity & Open Space to Residential Phase 2. Revert back to the Draft Plan as published in January 2015.

Appropriate Assessment of Further Modification to the Material Alterations to the Draft Headford Local Area Plan made at the meeting of Galway County Council on 28th September 2015

The modifications made to the proposed material alterations to the Headford Local Area Plan at the meeting today (28th September 2015) of Galway County Council are considered here in view of the Appropriate Assessment of the material alterations which was carried out in July 2015.

Material Alterations Proposed by Members	Further Modification to Material Alteration-Galway County Council Meeting 28-9-15	Key issues that may lead to a potential impact on Natura sites	Potential Impact
<p>MA 1 Include subject lands within the plan boundary and zone Residential-Phase 2 as per attached map (<i>Material Alterations Proposed to the Draft Plan – Map 1A Land Use Zoning - Draft Headford Local Area Plan</i>).</p>	<p>Remove parcel of land with the existing house from the plan boundary and retain zoning as per the MA (Residential Phase 2) on the remaining land</p>	<ul style="list-style-type: none"> • Zoning of lands for residential development in close proximity to waterways with a direct hydrological link to Lough Corrib. • Zoning of development lands close to flood zones. 	<p>May impact on the qualifying habitats and species of the Lough Corrib SAC and SPA through: - Reduced habitat quality (water quality) - Disturbance to mobile species</p>
<p>MA 2 Include the subject lands within the plan boundary and zone Business & Enterprise as per attached Map 1A.</p>	<p>Remove parcel of land from the plan boundary that are located in Flood Zone A & B and retain zoning of B & E on the remaining land.</p>	<ul style="list-style-type: none"> • Zoning of lands for Business and Enterprise development in close proximity to waterways with a direct hydrological link to Lough Corrib. • Zoning of development lands close to flood zones. 	<p>May impact on the qualifying habitats and species of the Lough Corrib SAC and SPA through: - Reduced habitat quality (water quality) - Disturbance to mobile species</p>
<p>MA 5 Rezone the lands from Recreation, Amenity and Open Space to Residential-Phase 2 as per attached Map 1A.</p>	<p>Remove parcel of land from the plan boundary that are located in Flood Zone A & B and retain Residential Phase 2 on the remaining land</p>	<ul style="list-style-type: none"> • Zoning of lands for residential development in close proximity to waterways with a direct hydrological link to Lough Corrib. • Zoning of development lands close to flood zones. 	<p>May impact on the qualifying habitats and species of the Lough Corrib SAC and SPA through: - Reduced habitat quality (water quality) - Disturbance to mobile species</p>

Material Alterations Proposed by Members	Further Modification to Material Alteration-Galway County Council Meeting 28-9-15	Key issues that may lead to a potential impact on Natura sites	Potential Impact
MA 7 Rezone the subject lands identified outside of the flood risk zones and wastewater treatment plant buffer as Residential – Phase 2, as per attached Map 1A.	Zone Lands as per the Material Alterations	<ul style="list-style-type: none"> • Zoning of lands for residential development in close proximity to waterways with a direct hydrological link to Lough Corrib. • Zoning of development lands close to flood zones. • In combination effects with MA5 	May impact on the qualifying habitats and species of the Lough Corrib SAC and SPA through: - Reduced habitat quality (water quality) - Disturbance to mobile species

The removal of lands located within Flood zones A and B from the Plan boundary in the lands subject to Material Alterations 1, 2 & 5 will reduce the risk of impacts on the qualifying habitats of Lough Corrib SAC and SPA due to impacts associated with flood events. However, the zoning of the remainder of the subject lands for residential or commercial development in close proximity to flood zones and waterways still presents a risk of negative impacts on the Lough Corrib SAC and SPA Natura sites through reduced habitat quality and especially reduced water quality as well as direct disturbance to qualifying species or degradation of their habitat.

To this end, it is recommended that the existing mitigation measures which were recommended in the Appropriate Assessment Screening for the Proposed Material Alterations to the Plan (July 2015) are adopted and implemented for the Material Alterations 1,2,5 and 7 as modified.

Material Alterations 3 and 4 have reverted back to the Draft Plan as published in January 2015. Material Alteration 6 is now excluded from the Plan boundary and can now be screened out as the subject lands will no longer be zoned for development.

Together with the existing policies and objectives relating to the Habitats Directive, Water Quality and Flood Risk Management already contained in the Draft Headford Local Area Plan, it is considered that these measures will be sufficient to ensure that there will be no adverse effect on the integrity of Natura sites arising from the implementation of the proposed Material Alterations to the Draft Headford Local Area Plan 2015-2021.

Material Alteration	Mitigation
MA1	<ol style="list-style-type: none"> 1. Any development proposals should be considered with extreme caution and will be required to comply with The Planning System and Flood Risk Management Guidelines for Planning Authorities/Circular PL2/2014 & the associated Development Management Justification Test. Climate Change should be duly considered in any development proposal. 2. A buffer zone will be included so that no development is permitted within 20m of the river bank. 3. Any development proposals submitted for this site will require a detailed ecological report (s), carried out by suitably qualified personnel for the purposes of informing Appropriate Assessment Screening by Galway County Council, the competent authority.

	<p>4. The relevant lands will be outlined and flagged with a symbol on the land use zoning map and on the GIS system of Galway County Council so that staff and the public are aware of the special conditions/constraints attached.</p> <p>5. A briefing will be provided to relevant staff within Galway County Council on the special conditions and constraints on relevant lands.</p>
MA2	<p>1. Any development proposals should be considered with extreme caution and will be required to comply with The Planning System and Flood Risk Management Guidelines for Planning Authorities/Circular PL2/2014 & the associated Development Management Justification Test. Climate Change should be duly considered in any development proposal.</p> <p>2. A buffer zone will be included so that no development is permitted within 20m of the river bank.</p> <p>3. Any development proposals submitted for this site will require a detailed ecological report (s), carried out by suitably qualified personnel for the purposes of informing Appropriate Assessment Screening by Galway County Council, the competent authority.</p> <p>4. The relevant lands will be outlined and flagged with a symbol on the land use zoning map and on the GIS system of Galway County Council so that staff and the public are aware of the special conditions/constraints attached.</p> <p>5. A briefing will be provided to relevant staff within Galway County Council on the special conditions and constraints on relevant lands.</p>
MA5	<p>1. Any development proposals should be considered with extreme caution and will be required to comply with The Planning System and Flood Risk Management Guidelines for Planning Authorities/Circular PL2/2014 & the associated Development Management Justification Test. Climate Change should be duly considered in any development proposal.</p> <p>2. A buffer zone will be included so that no development is permitted within 20m of the river bank.</p> <p>3. Any development proposals submitted for this site will require a detailed ecological report (s), carried out by suitably qualified personnel for the purposes of informing Appropriate Assessment Screening by Galway County Council, the competent authority.</p> <p>4. The relevant lands will be outlined and flagged with a symbol on the land use zoning map and on the GIS system of Galway County Council so that staff and the public are aware of the special conditions/constraints attached.</p> <p>5. A briefing will be provided to relevant staff within Galway County Council on the special conditions and constraints on relevant lands.</p>
MA7	<p>1 Any development proposals should be considered with extreme caution and will be required to comply with The Planning System and Flood Risk Management Guidelines for Planning Authorities/Circular PL2/2014 & the associated Development Management Justification Test. Climate Change should be duly considered in any development proposal.</p> <p>1. Any development proposals submitted for this site will require a detailed ecological report (s), carried out by suitably qualified personnel for the purposes of informing Appropriate Assessment Screening by Galway County Council, the competent authority.</p> <p>2. The relevant lands will be outlined and flagged with a symbol on the land use zoning map and on the GIS system of Galway County Council so that staff and the public are aware of the special conditions/constraints attached.</p> <p>4. A briefing will be provided to relevant staff within Galway County Council on the special conditions and constraints on relevant lands.</p>