

Habitats Directive Article 6

Screening Assessment

Tramore Local Area Plan

2014-2020

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**Waterford County Council
Comhairle Chontae Phort Láirge**

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Map 1. SACs and SPAs in County Waterford

Appendix 1 Screening Assessment of Draft Local Area Plan Policies and Objectives and proposed material amendments

1. Introduction to Habitats Directive and Article 6 Assessment

The aim of the European Habitats Directive (Council Directive 92/43/EEC on the conservation of wild habitats and of wild fauna and flora) is to create a network of protected wildlife sites in Europe, maintained at a favourable conservation status¹. Each member state must designate their most important natural areas as Special Areas of Conservation. The Directive specifies the scientific criteria on the basis of which SAC sites must be selected and very strictly curtails the grounds that can be used as justification for damaging a site. The network of sites is referred to as NATURA 2000 and includes SACs (Special Areas of Conservation) for protected habitats and species and SPAs (Special Protection Areas) for protected birds and their habitats.

The European Habitats Directive (Council of the European Communities 1992) was transposed into Irish legislation by the European Communities (Natural Habitats) Regulations 1997 and amended in 1998, 2005 and 2010. The Birds and Habitats Regulations 2011 addressed transposition issues raised in judgements of the ECJ against Ireland and along with provisions of the Planning and Development (Amendment) Act 2010 (Part XAB), clarified the obligations of planning authorities under the Birds and Habitats Directives.

The Regulations and the Planning and Development Amendment Act 2010 require planning authorities when considering plans or projects that are likely to have a significant effect on a SAC/SPA, to ensure that an appropriate assessment screening (and where required a full appropriate assessment) of the implications of the plan/project for the conservation status of the site is undertaken.

Sites may contain priority or non-priority habitats and species. The only justifications for damaging a qualifying "priority" site are "considerations relating to human health and public safety, to beneficial consequences of primary importance of the environment, or further to an opinion from the European Commission, to other imperative reasons of overriding public interest" (IROPI), but this can only be allowed after an assessment is made in line with the article 6 procedure, and there are no other alternatives and an agreement is reached with the European Commission.

Article 6 of the Habitats Directive provides a strict assessment procedure for any plan or project not directly connected with or necessary to the management of a designated European site but which has the potential to have implications for the site in view of

¹ The conservation status of a species can be taken as "favourable" when population dynamics data on the species concerned indicate that it is maintaining itself on a long term basis as a viable component of its natural habitats, the natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future and there is and will continue to be a sufficiently large habitat to maintain its populations on a long-term basis. Article 1 (i) of the Habitats Directive 92/43/EEC

The conservation status of a habitat can be taken as "favourable" when its natural range and area it covers within that range is stable or increasing and the ecological factors that are necessary for its long-term maintenance exist and are likely to continue to exist for the foreseeable future.

the site's conservation objectives. The Local Area Plan for Tramore 2014-2020, therefore, falls under the remit of Article 6.

2. Guidance on the implementation of Article 6

2.1 National Guidance

Circular Letter SEA 1/08 & NPWS 1/08 of 15 February, 2008 **Appropriate Assessment of Land Use Plans** states that:-

Any draft land use plan (development plans, local area plans, regional planning guidelines, schemes for strategic development zones) or amendment/variation to it proposed under the Planning and Development Act 2000 (as amended) must be screened for any potential impact on areas designated as Natura 2000 sites (normally called Special Areas of Conservation (SACs) or Special Protection Areas (SPAs).

This screening should be based on any ecological information available to the authority and an adequate description of the plan and its likely environmental impacts. This should take into account any policies that will set the terms for future development. Up to date maps of Natura 2000 sites, or areas proposed for designation, are available on www.npws.ie. The results of the screening should be recorded and made available to the public.

In any case where, following screening, it is found that the draft plan or amendment may have an impact on the conservation objectives of a Natura 2000 site or that such an impact cannot be ruled out, adopting a precautionary approach-

- an Appropriate Assessment of the plan must be carried out and
- in any case where a strategic environmental assessment (SEA) would not otherwise be required, it must also be carried out.

2.2 DoEHLG Guidance

The Department of Environment, Heritage and Local Government published *Appropriate Assessment of Plans and Projects in Ireland, Guidance for Planning Authorities in December 2009*. This guidance document establishes the steps and procedures to be followed in undertaking an appropriate assessment of statutory land use plans within the framework of current planning legislation.

Section 4.10 of the Guidance states “ It is the competent authority’s responsibility to carry out the appropriate assessment of the plan. The Statement of AA of plans should be based on best available information, objective criteria, best scientific knowledge and expert judgement in relation to its impact on the integrity of a Natura 2000 site with respect to the conservation objectives of the site and to its structure and function. There should be no reasonable scientific doubt as to the absence of effects.”

It is recommended that the Department be consulted by a planning authority at every stage of the plan making process (i.e. at the pre-draft, draft and proposed amendments stages). The Department’s comments should be taken into account by the planning

authority before the plan is adopted. In each iteration of the plan, earlier observations from the Department should be carried forward.

Section 4.8 of the guidance states “ The key to deciding if an appropriate assessment of a plan would be required is determined by an assessment of whether the plan and its policies and objectives are likely to have a significant effect on a Natura 2000 site. The decision will be influenced by the nature and extent of the development likely to be proposed in the plan, and the plan’s area *in situ*, *ex situ* and in combination relationship to adjoining the Natura 2000 sites and the wider Natura 2000 network.

When screening the plan and its policies and objectives there are two possible outcomes:

The plan poses no risk of a significant effect and as such requires no further assessment; and

The plan has potential to have a significant effect (or this is uncertain) and AA of the plan is necessary.

Screening can be used to establish which policies and objectives have potential to have significant effects, and therefore the ones that require further attention at the AA stage.

2.3 European Guidance

The European Commission methodological guidance on the provisions of article 6(3) and 6(4) of the Habitats Directive sets out the four stages for the assessment.²

Stage 1. Screening — the process which identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant;

Stage 2. Appropriate assessment — the consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the site’s structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts;

Stage 3. Assessment of alternative solutions — the process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site;

² *Assessment of plans and projects significantly affecting Natura 200 sites- methodological guidance on the provisions of Article 6(3) and 6 (4) of the Habitats Directive 92/43/EEC.*
Managing Natura 2000 sites The provisions of Article 6 of the Habitats Directive 92/43/EEC.
European Commission (2002)

Stage 4. Assessment where no alternative solutions exist and where adverse impacts remain — an assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

3. Procedure for stage one screening

This report consists of a Stage 1 Screening for Habitats Directive Assessment of the Local Area Plan for Tramore 2014-2020.

This stage examines the likely effects of the Local Area Plan on Natura 2000 sites in Tramore and within a 15km radius of the town and considers whether it can be objectively concluded that these sites will not be significantly impacted. This assessment comprises four steps:-

Step 1: determining whether the project or plan is directly connected with or necessary to the management of the site: -

The Local Area Plan 2014-2020 is a spatial planning framework for Tramore and is not directly connected to the management of any Natura 2000 sites.

Step 2: describing the project or plan and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the Natura 2000 site;

The objective of the Local Area Plan is to provide a strategic planning framework for the development of Tramore. The Plan is intended to be a framework for local authority development and will address issues such as settlement, transportation, industrial development, community facilities and environmental protection.

With a total population in excess of 10,238 (Census 2011), Tramore is the largest settlement in County Waterford. One of the key assets of the town is its diversity of natural heritage and seascape providing for a strong tourism base. The main water corridor is the Garruan Stream that flows along the Glen Road and into Tramore Back Strand at Sommerville which is designated a SPA. There are 3 Natura 2000 sites within the Tramore Local Area Plan boundary, Tramore Dunes and Back Strand SAC and SPA and the mid-Waterford Coasty SPA designated for Chough. The River Suir SAC is 8km away from the Town Plan area.

Step 3: Identifying the potential effects on the Natura 2000 site;

The DoEHLG Guidance on Appropriate Assessment on Plans and Projects in Ireland (December 2009) states that all N2000 sites within or adjacent the plan area must be mapped and tabulated, and site integrity and site conditions necessary to support the site integrity must be indicated.

The information presented in Table 1 comprises a breakdown of Natura 2000 sites within Tramore. The N2000 sites are listed by designation; Special Area of Conservation / Special Protection Area. The following information is listed for each N2000 site:

- Site code
- Site name
- Qualifying interests
- Conservation objectives
- Threats to site integrity

Table 2 details Natura 2000 sites outside Tramore but within a 15km buffer of the town.

Step 4: Assessing the significance of any effects on the Natura 2000 site.

The screening stage involves application of the precautionary principle proportional to the policy/objective and the Natura 2000 site in question. Objectives, policies and zonings from the Draft Local Area Plan (2014-2020) and their impact on the N2000 network have been screened to ascertain if the policies / objectives are likely to have significant effects on any Natura 2000 sites, using the following framework.

- Local Area Plan zoning/policy/objective
- N2000 site
- Qualifying interests
- Threats to site integrity
- Potential impacts from Local Area Plan
- Risk of significant impact (Y/N)
- Potential 'in combination' impacts
- Risk of significant impacts (Y/N)
- Avoidance and (then) mitigation measures
- Action required: Policy change needed / rewording / additional CDP objective

Where no significant effects are found, then policies or objectives are accepted. If all the policies / objectives in the Local Area Plan are found not to have a significant effect on any Natura 2000 site then a Finding of no Significant Effects Report is prepared and no further HDA assessment is required.

Where a policy / objective as worded does have a significant effect, then the policy /objective needs to be amended or rejected. The local authority understands that if it still wishes to proceed with the policy /objective even though it may have a significant effect, then a Stage 2 extended HDA assessment is required.



Table 1: Natura 2000 sites within Tramore

County Waterford		Special Areas of Conservation (SACs)		
Site code	Site name	Qualifying interests	Conservation objectives	Threats to site integrity
	Tramore Dunes and Back Strand SAC	Mudflats and sandflats not covered by seawater at low tide Annual vegetation of drift lines Perennial vegetation of stony banks <i>Salicornia</i> and other annuals colonizing mud and sand Atlantic salt meadows (<i>Glauco-Puccinellietalia maritimae</i>) Mediterranean salt meadows (<i>Juncetalia maritimi</i>) Embryonic shifting dunes Shifting dunes along the shoreline with <i>Ammophila arenaria</i> ("white dunes") Fixed coastal dunes with herbaceous vegetation ("grey dunes")	To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected.	Erosion, walking, horseriding and non motorised vehicles, trampling, overuse, sea defence or coastal protection works, undergrazing, invasion by a species, camping and caravans, agricultural improvement, stock feeding, overgrazing, paths, tracks, cycle routes, golf courses, restructured agricultural land holding, disposal of household waste, sand and gravel extraction, other pollution or human activities, aquaculture, professional fishing, bait digging, removal of fauna, aggregate extraction, removal of beach material, industrialisation, port/marina, communication networks, water pollution, reclamation of land,
	Tramore Back Strand SPA	Light-bellied Brent Goose (<i>Branta bernicla hrota</i>) Golden Plover (<i>Pluvialis apricaria</i>) Grey Plover (<i>Pluvialis squatarola</i>) Lapwing (<i>Vanellus vanellus</i>) Dunlin (<i>Calidris alpina</i>) Black-tailed Godwit (<i>Limosa limosa</i>) Bar-tailed Godwit (<i>Limosa lapponica</i>) Curlew (<i>Numenius arquata</i>)	To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA	Disturbance, Water Quality, Invasive Species

	Wetlands & Waterbirds		
Mid-Waterford Coast	Peregrine, Chough	To maintain the bird species of special conservation interest for which this SPA has been listed at favourable conservation status	Development, Change in agricultural practices, agricultural abandonment, encroachment of scrub, loss of close-sward grazing,

Table 2: Natura 2000 sites within 15km of Tramore

County Waterford		Special Areas of Conservation (SACs)		
Site code	Site name	Qualifying interests	Conservation objectives	Threats to site integrity
0002137	River Suir	Alluvial Wet Woodlands and Yew Wood, Floating River Vegetation, Atlantic Salt Meadows, Old Oak Wood and Eutrophic Tall Herbs Sea Lamprey, Brook Lamprey, River Lamprey, Freshwater Pearl Mussel, Crayfish, Twaite Shad, Atlantic Salmon, Otter	To maintain the Annex I habitats and Annex II species for which the cSAC has been selected at favourable conservation status.	Obstructions, , gross pollutants, specific pollutants, channel maintenance, man-made barriers to migration, eutrophication, leisure fishing drift netting, use of pesticides, fertilisation,)hunting, trapping, poisoning, poaching, sand and gravel extraction, , urbanised areas, human habitation, continuous urbanisation, industrial or commercial areas, discharges, disposal of household waste, industrial waste, inert materials, other discharges, routes,

5. Screening Assessment

Table 4 presents assessment of impacts from the Draft Local Area Development Plan 2014-2020 at a strategic level on Natura 2000 sites where they occur within the catchment of Tramore.

Table 4. Habitats Directive Assessment Matrix to determine risk of significant impacts on SACs and SPAs.

Natura 2000 Site SAC	Pressure Topic	Possible impacts from Local Area Plan	Risk of Significant Impact	Mitigation measure
Tramore Dunes and Back Strand	<p>Water quality Waste Water Treatment</p> <p>Landfill Site</p>	Increase in population in Tramore	<p>Secondary treatment with a population equivalent to serve 20,000 p.e. is available at Tramore and adequate to serve existing needs.</p> <p>Landfill has been closed since 2005 and is subject to annual environmental monitoring including monitoring of leachate and an annual ecological report</p>	<p>Local Area Plan INF Policies in section 5.2.2</p> <p>Proposed future phased-zoning of 240 ha a reduction from the existing 284 ha zoned residential in existing plan</p> <p>Provisions of Waste Water Discharge (Authorisation) Regulations S.I. no 684 of 2007 and application of PD 7/09</p> <p>South-East River Basin District Management Plan</p> <p>Conditions of EPA Waste Licence(75-02 2007)</p>

Tramore Dunes	Recreational pressure	Growth in population could cause increased recreational use and erosion of dunes area	Tramore dunes are subject to ongoing erosion caused by impacts from weather and human recreation. Restoration works to combat erosion have been carried out by the local authority in 2010 and 2011.	Tramore Dunes Bye-Laws Local authority conservation works and awareness efforts through signage.
Tramore Back Strand	Disturbance Water Quality Opening of public access to former landfill site	Increased use of amenity grassland on former landfill site could increase level of disturbance to birdlife	Due to the large size of Tramore Back Strand it is considered there is adequate alternative feeding and roosting areas and the increased access to the amenity grassland in an area at the edge of an urban settlement subject to existing levels of human activity should not cause adverse significant impacts on bird life in the SPA. Water quality is monitored as part of the landfill monitoring programme	Environmental Monitoring Plan for landfill site. Provision of compensatory wetland habitat at Kilmacleague will increase available habitat for wintering wildfowl and waders.
Natura 2000 Site SPA	Pressure Topic	Possible impacts from Local Area Plan	Risk of Significant Impact	Mitigation measure

Mid-Waterford Coast	Disturbance	The Mid –Waterford Coast SPA overlaps with the western area of the Tramore Local Area Plan and is zoned as agricultural green belt	None- change in zoning from agricultural greenbelt to open space will incur stronger protection for landscape in this area.	Existing agricultural greenbelt zoning will be changed to open space /conservation zoning.
River Suir	No physical or hydrological link to River Suir SAC from Tramore	None	None	None
Annex II species	Conservation Status³ (National level)	Pressure Topic		Risk of significant impact Mitigation measure
Otter	Poor Otter known from Tramore Back Strand	Water quality Disturbance		Infrastructure projects will be subject to AA. at the project level

³ The Status of EU Protected Habitats and Species in Ireland DoEHLG 2008

5.2 Potential Impacts and Mitigation

5.2.1 Strategic Objectives

Tramore has been identified as a Secondary Service Centre in County Waterford and in population terms is the largest settlement in the County. The Local Area Plan 2014-2020 aims to support growth in Tramore where existing and proposed infrastructural capacities permit. The Core Strategy aims to ensure that the integration of an increased population is aligned with adequate services, infrastructure and transport links, thereby underpinning proper planning and sustainable development. Tramore Town and environs recorded a population of 10,328 persons under the 2011 Census which represents an increase of 7.2% (9,634) from 2006. Population projections from 2017 to 2020 as contained in the County Development Plan, predict an increase of 3.18% for Tramore. This results in a population projection of 11,305 persons until 2019. It is estimated that an additional 359 units will be required over the lifetime of the Plan. There are 456 housing units already and currently committed to development in Tramore. Applying a household size of 2.68, an additional 87 housing units will be required until 2019. Allowing for 75% over-zoning and based on an average density of 15units/ha, this results in a requirement of 42 hectares of residentially zoned lands until 2019.

In the context of Habitats Directive Assessment, potential impacts on Natura 2000 sites may arise where increased population growth cannot be served by water and wastewater infrastructure leading to deterioration of water quality standards and pollution which may compromise habitat quality and thereby affect the favourable conservation status of habitats and species. Eutrophication in some instances may provide richer feeding grounds for bird life in SPAs but in the main, water pollution is considered a threat to site integrity in the Natura 2000 network.

Development zoning in towns near rivers, estuaries and along coastlines which are designated SAC/SPA requires the provision of adequate waste water treatment capacity and appropriate level of treatment to reduce the threat of deteriorating water quality. The Tramore WWT plant (secondary treatment) has capacity to service current and projected future population with a Population Equivalent of 20,000. The second phase of the Tramore Sewerage Scheme upgrade is proposed to commence during this Plan period and will consist of increased capacity at the Wastewater Treatment Plant, the separation of foul and storm flows as well as improved stormwater attenuation.

A future phased residential zoning of 240ha is proposed in the review of the current Local Area Plan in line with population targets set out in the Co. Development Plan Core Strategy and South East Regional Planning Guidelines 2010-2022.

5.2.2 Development Policies and Objectives

Potential impacts on the Natura 2000 network from all policies, development objectives and zonings in the Draft Local Area Plan were assessed. Appendix 1 details comments/amendments proposed to those policies and objectives found to have potential for impacts. While some policies set a framework for future development that may impact on SACs/SPAs, the strategic nature of the policy may not contain sufficient detail to accurately assess the significance of the impact and thus it is considered that the impacts will be more appropriately assessed at project level if and when that project is progressed. The importance of maintaining ecological connectivity between sites and opportunities to enhance biodiversity is recognised by inclusion of policies G1 and G2 in support of Article 10 of the Habitats Directive and green infrastructure.

Any potential impacts at project level should also be addressed by the range of policies contained in Section 6.3 of the Local Area Plan relating to Natural Heritage. Overlay of Natura 2000 sites on Tramore LAP zoning shows there are no conflicting land use zonings encroaching on the boundary of designated Natura 2000 sites.

The western section of the Tramore Local Area Plan overlaps with the Mid-Waterford Coast SPA and is currently zoned as Agricultural greenbelt. The plan review included a change of this zoning to open space to coincide with the SPA boundary and reconcile the protected status of the site.

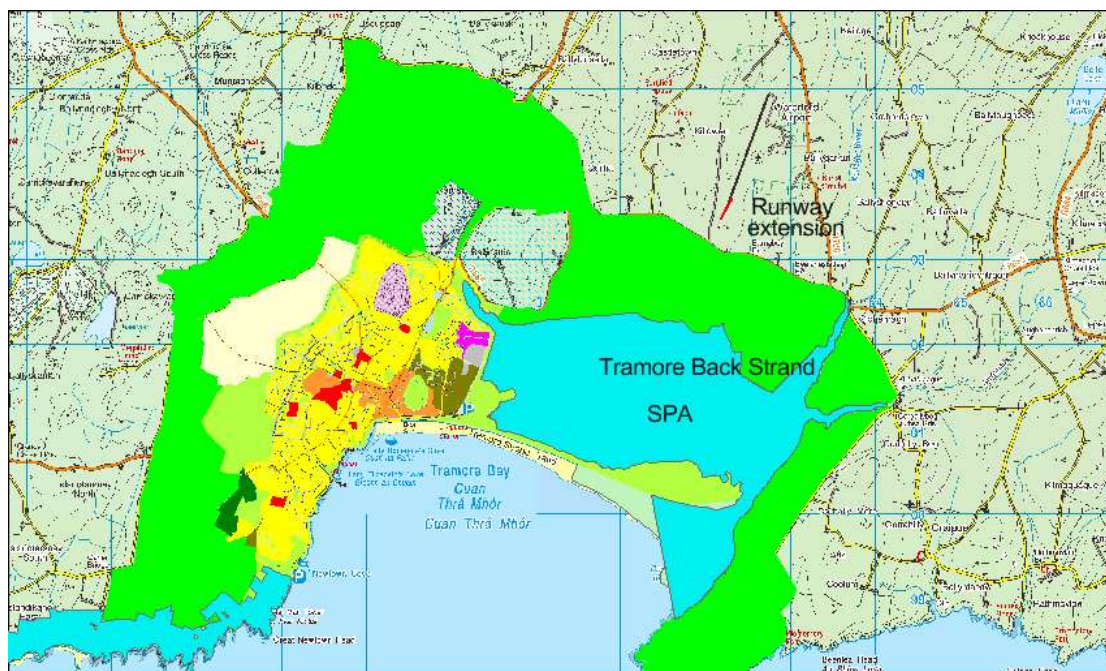
6. In-combination effects

Kilmacleague Compensatory Wetlands

A site on the north side of Tramore Back Strand totalling 22ha of agricultural grassland in Kilmacleague was acquired by Waterford County Council for the purpose of creating compensatory wetland habitat and completed in May 2013. This project was required as compensation for loss of coastal wetland within the Tramore Dunes SAC from the former landfill site. The wetland was created by constructing a new sea embankment and breaching the existing sea embankment to enable inundation of the compensatory wetland area which is lower than the adjoining Back Strand. The site will be monitored and its ecological development may merit its inclusion with the Tramore Back Strand SPA in time. An AA was carried out on the compensatory wetland proposal and concluded the development was unlikely to have negative impacts on the birds using Kilmacleague Fields nor on the conservation objectives of Tramore Back Strand SPA. This was based on the scheme of habitat creation (inundation) of 7 ha and increase of grassland managed for birds to 9.5 ha.

Waterford Airport

Proposals are being considered by the Waterford Airport Authority for an extension to the airport runway at Killowen to the north of the Back Strand and outside the Tramore LAP boundary. This project will require a full AA at project inception stage including a bird strike risk assessment to assess the impacts on bird usage of the Back Strand SPA as per policies NH1 and NH2 of the Tramore Local Area Plan.



Map 2. Location of potential Waterford Runway extension in relation to Tramore Back Strand SPA

6.1 Impacts on Natura sites within 15km of County Waterford

There is one Natura 2000 site located within 15km of Tramore – the River Suir SAC. No significant effects are implied for the River Suir SAC from policies, objectives and zonings in the Tramore LAP 2014-2020.

6.2 Consultation

The Draft Tramore Local Area Plan, Environmental Report and AA Screening Report were put on public display from June 10th 2013 until July 22nd 2013. A total of 20 submissions were received in relation to the plan including one submission on AA received from the DAHG. The DAHG recommended preparation of a full AA and advised the Plan can only be adopted where there are sufficient mitigation measures in the objectives of the Plan to result in a commensurate reduction in recreational pressure on dune habitats over the lifetime of the Plan. They stated “some measures may need to be habitat specific and require consultation with the NPWS.”. Their submission also recommended the effects of lighting associated with new development at Ballinattin on the adjacent SPA should be specifically assessed in the

Screening for Appropriate Assessment. Furthermore they advised that policies CS10 and CS 11 regarding pedestrian walkways may have potential for disturbance of feeding or roosting birds and requires AA and the Dune walk also needs to be assessed for AA.

With regard to recreational pressure on Tramore Dunes, the Tramore LAP seeks to “conserve, maintain and facilitate restoration of the favourable conservation status of species and habitats within Tramore Dunes and Back Strand SAC and SPA” (Policy NH1). Policy NH2 requires compliance “with Article 6 of the Habitats Directive to ensure that there is no significant adverse impact of development on the integrity of the Tramore Dunes and Back Strand SAC and SPA and that the requirements of Articles 6(3) and 6(4) of the Habitats Directive are fully satisfied by screening all projects and plans for Appropriate Assessment.”

Pressures on biodiversity in Tramore include recreational pressure on the dunes area in Saleens which has been subject to traffic by off-road motorised vehicles compacting dune vegetation and exposing bare sand. Waterford Co. Council carried out deterrent measures in 2013 including blocking off of access points from the strand and signage and this has reduced the level of activity on the site. The main dunes spit is also subject to recreational pressure and conservation works were carried out by the local authority in 2010 and 2011 including exclusion fencing, establishment of sand ladders and transplanting of Marram Grass. However, with the increasing occurrence and severity of winter storms that have been typical of the past number of years, maintenance of these works is challenging and the impacts from severe storms is having as much impact on the vegetation as erosion from human usage. Subject to available resources and /or sustainability appraisal the Council will consider installation of a boardwalk to channel pedestrian traffic and avoid pressure on the saltmarsh habitat between the promenade and the main dune spit.

It is considered the Tramore LAP includes relevant and adequate policies and objectives in relation to the conservation of Tramore Dunes. Control of recreational pressure can only be achieved by appropriate enforcement of the Tramore Beach Bye-Laws and the 2011 Birds and Habitats Regulations and as most of the recreational pressures (walking, scrambling, off-road vehicles) are outside the remit of planning legislation it is considered the plan does not require a full AA in this regard.

With regard to assessing the impacts from lighting from development in Ballinattin, amendments proposed to the Draft Plan included re-zoning of 2 ha from new residential to Open Space along the southern boundary of the site i.e. the are adjacent to the SPA. This is considered a positive zoning change as it permits a green buffer adjacent to the SPA. Approval was granted in 2012 for residential serviced sites development works, an industrial unit and outline permission for 17 dwellings. The development application was subject to AA Screening which concluded no significant

impact from the proposal on the conservation objectives of the adjacent SAC and SPA.

With regard to assessment of impacts from policies CS 10 and CS 11 and the dune walk, Tramore hosts 2 looped walks- the Doneraile Walk and the Dunes Walk. The Doneraile walk runs along the coast at the western end of Tramore out towards Newtown Cove and is located away from the Natura 2000 sites. The Dunes Walk runs along the Promenade and shingle ridge towards the neck of the Sand Spit. The remediated landfill is also popular with dog walkers. While the latter 2 walks are adjacent to the Back Strand the extensive area of the SPA allows for easy dispersal of birds should they become subject to disturbance near these sites. As the SPA is of note largely for its populations of wintering wildfowl this time of year attracts the lowest number of walkers and thus disturbance from recreational users is much lower than in summer. Reference to the waterbird distribution-dot density diagrams recorded during low-tide surveys in 2010, 2011 and 2012⁴ show the count unit of OM433 (area of Back Strand east of Landfill site and Sea Wall where most walkers frequent) hosts 1 roost location used by 5 species (Cormorant, Dunlin, Gadwall, Mallard and Oystercatcher). Qualifying species listed for the SPA such as Brent Geese, Golden Plover, Black-tailed Godwit, Bar-Tailed Godwit, Lapwing and Curlew do not frequent this area of the Back Strand so much, preferring areas further to the north and north east of the Back Strand. The reports rates disturbance to birdlife from walking in this area as moderate. The area of land east of the Riverstown relief road is zoned as Open Space which includes passive and active recreational use. Policies NH1 and NH2 seek to protect the favourable conservation status of Tramore Dunes SAC and SPA thus it is considered the plan does not require a full AA in this regard.

The Draft Local Area Plan and Proposed Material Amendments and AA Screening Report were made available for public consultation from November 4th 2013 until December 2nd 2013. No submissions were received on the AA Screening Report.

6.3 Impacts from proposed material amendments to the plan

All material amendments proposed for the Draft Tramore LAP were screened for their impacts on the Tramore Back Strand SAC and SPA. No policy/objective amendments were appraised to have potential for negative significant effects on the Natura 2000 network. The proposed addition of Policy GH1 and objectives NHI and G1 is considered positive for the natural environment. Uncertain impacts from Draft Plan policies and objectives such as ETD1 (zoning of industrial lands), ETD 2 (Water based tourism activities), Obj INF 7 (provision of a helipad) and CS11 (promotion of walkways and cycleways) have been addressed through revised and strengthened policies that incorporate reference to requirements of Habitats and Birds Directives as appropriate.

⁴ Tramore Back Strand SAC and SPA- Conservation Objectives Supporting Document (NPWS 2013)

Zoning amendments to the plan including zoning changes for Tankfield, Newtown, Pickardstown, Crobally, Ballinattin, CBS, Pond Road and the Glen Road are considered not to pose significant effects on Tramore Back Strand SAC and SPA. The zoning amendment proposed for Crobally Lower involving rezoning from open space to residential while outside the SAC is adjacent to the designated site and currently acts as a green space buffer to the SAC. Approval of the rezoning will require any proposed development on the site under this zoning to be subject to Project Appropriate Assessment as qualified by objectives NH1 and G1 and policy NH1 in the Plan.

7. Conclusion

A Habitats Directive Screening Assessment was carried out on the Draft Local Area Plan for Tramore 2014-2020 and proposed material amendments. A review of conservation objectives and threats to site integrity for the range of Natura 2000 sites within and adjacent to the plan area was undertaken to identify sites that may be impacted by policies/objectives in the Local Area Plan. Pressure topics such as waste water treatment and disturbance were assessed for their impacts on Tramore Back Strand. The assessment found there is adequate wastewater treatment capacity for existing and future population growth in the town. The proposed future phased zoning of 240ha of residential lands until 2020 supports the sustainable development of the town.

In -combination impacts were considered involving a review of policies in the Co. Development Plan and Waterford City Plan and proposals/developments at Waterford Airport and the compensatory wetland project at Kilmacleague.

Waterbird distribution maps were taken account of in the assessment of disturbance to bird species in the SPA from walking routes in the plan area. A level of moderate disturbance is inferred from walkers along the dunes walk to count area OM433.

It is concluded that the policies, objectives and zonings in the Tramore Local Area Plan 2014-2020 and proposed material amendments will not have an adverse impact on the integrity and conservation objectives for Tramore Dunes and Back Strand SAC and SPA, Mid-Waterford Coast SPA nor on other Natura 2000 sites within the catchment.



This assessment should be read in conjunction with the Tramore Local Area Plan 2014-2020 and the accompanying Environmental Report prepared in fulfilment of the SEA process.





Appendix 1. AA screening of Draft Local Area Plan policies and objectives






Reference No.	Draft Local Area Plan Policy 2013-2019	Comment/Proposed Amended Policy following screening of Draft Plan	Amended policy following public consultation and review of submissions
Policy PDCS 1	To ensure the development of Special Use lands identified in Ballinattin, Pickardstown and Tramore Racecourse in land use zoning map are in accordance with Masterplans so as to ensure their co-ordinated and orderly development. The Masterplans may be prepared by a single developer or landowner or by a group of developers or landowners acting jointly	To ensure the development of Special Use lands identified in Ballinattin, Pickardstown and Tramore Racecourse in land use zoning map are in accordance with Masterplans <u>and the requirements of the Water Framework, Floods, Habitats, Birds, SEA and EIA Directives where relevant</u> so as to..... Acting Jointly. Subject to policies NH1 NH2 and NH3, G1 and G2	
Policy IN1	To promote Tramore as a base for major industrial development through the zoning of appropriate industrial lands	Any future industrial development will be subject to policies NH1 NH2 and NH3, G1 and G2	





Policy TP2	To support the diversification of a range of a tourist facilities and attractions through the area, while protecting the surrounding natural environment of Tramore	Tourism development will be subject to policies NH1 NH2 and N3, G1 and G2	
Policy TO5	To support the establishment of a range of water based tourism activities in Tramore	Subject to policies NH1 NH2	
Obj INF 5	To improve the access between Tramore and Waterford Airport and to upgrade the junction of the Glen Road and the Main Waterford / Tramore Road	Subject to policies NH1 NH2 and NH3	
Obj INF 7	Facilitate the provision of a helipad at a suitable location within the Town or its environs	Facilitate the provision of a helipad at a suitable location within the Town or its environs <u>subject to an assessment of its impacts on Tramore Back Strand SAC and SPA</u> Subject to policies NH1 NH2 and NH3	
Policy INF	To endeavour to facilitate the orderly growth of the urban area and to preserve coastal	Subject to policies NH1 NH2 and NH3	

	amenity by providing sewerage of those areas delineated for development under this Plan		
Policy NH4	To monitor the development of the created wetland at Kilmacleague to ensure maximum conservation gain for the site and seek to attain qualifying status for inclusion within the Tramore Back Strand SAC and SPA	Positive objective for the favourable conservation status of Tramore Back Strand SPA	
Policy CS 10	To promote Tramore as an area for amenity walks and to play as role in promoting Waterford as <i>"The Walking Capital of Ireland"</i>	To promote Tramore as an area for amenity walks and to play as role in promoting Waterford as <i>"The Walking Capital of Ireland"</i>	
Proposed Material Amendments			
Section 1.7 Vision		To continue to strengthen Tramore's tourism sector which respects and promotes its natural, built and cultural heritage while seeking to develop a modern and diversified year round tourism offering	
ETD1		To promote Tramore as a base for significant and appropriate industrial development	

		lands. Any zoning for industrial development should not be in conflict with the requirements of the <u>Water Framework, Floods, Habitats, Birds, SEA and EIA Directives</u>	
Obj ETD 10		To support the establishment of a range of sustainable based tourism activities in Tramore subject to the requirements of the <u>Water Framework, Floods, Habitats, Birds, SEA and EIA Directives</u>	
CS11		Promote and facilitate the provision of quality amenity pathways and cycleways <u>subject to the requirements of the Habitats and Birds Directives</u>	
Zoning Amendments			
 	Amend zoning from Utility to Community Services for the Tramore Civic Office	Not significant effect for AA	
	Re-zone lands from Open Space to residential in Crobally Lower	Site lies adjacent to boundary of Tramore Back Strand SAC and SPA and Open Space Zoning would provide a buffer to the environmentally sensitive site. The site itself is not of significant ecological value and has been filled with a large volume of earth spoil. The proposed zoning change is subject to policies NH1 and NH2 . Any proposed development on the site will be	

		subject to AA
 	Re-zone lands from Community Services to existing residential in Newtown	Not significant effect for AA
	Pickardstown Masterplan to be zoned as Tourism, Open Space and Mixed Use Enterprise	Not significant effect for AA

			
 	<p>Re-zone lands at Aldi Site in Crobally from Open space to Commercial</p>	<p>Not significant effect for AA</p>	
 	<p>Re-zone 2 ha from residential to Open Space in Ballinattin</p>	<p>Not significant effect for AA</p>	

 	<p>Re-zone lands at CBS from existing residential to Community Services</p>	<p>Not significant effect for AA</p>	
	<p>Re-zone lands on Pond road from Open Space and Existing Residential to Community Service</p>	<p>Not significant effect for AA</p>	
	<p>Re-zone lands on the Glen Road from Open Space to residential</p>	<p>Not significant effect for AA</p>	

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