

CLONAKILTY DEVELOPMENT PLAN 2009-2015

SEA STATEMENT

1.0 Introduction

In accordance with Article 7 of the Planning & Development Regulations 2004, section 13(I), this report consists of an SEA Statement in relation to the Clonakilty Town Development Plan 2009 - 2015 and forms the final part of the requirements for the Strategic Environmental Assessment (SEA) of the Plan.

The main purpose of the SEA Statement is to provide information on the decision-making process and to document how environmental considerations, the views of consultees and the recommendations of the Environmental Report have been taken into account in the adopted Clonakilty Development Plan 2009 - 2015. It illustrates how decisions were taken, making the process more transparent. This statement will be made available to the public to accompany the adopted Plan.

The SEA Statement includes the following information:

- 1. Summary of how environmental considerations and the Environmental Report were factored into the plan;
- 2. Summary of how submissions/consultations were taken into account: How consultation responses have been taken into account;
- 3. Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered:
- 4. Measures to monitor the significant environmental effects of implementing the Plan;

2.0 Process

As part of the preparation of the Clonakilty Development Plan, RPS Consultants carried out a Strategic Environmental Assessment (SEA). SEA is the process by which environmental considerations are required to be fully integrated into the preparation and adoption of Development Plans and other plans and programmes. The objective of the SEA process is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into plans and programmes with a view to promoting sustainable development.

The SEA process was undertaken in parallel with each stage of the draft Plan making process and involved close consultation and meetings with the SEA Consultation Authorities, members Cork County Council that drafted the Clonakilty Town Development Plan 2009 - 2015, members of Clonakilty Town Council and the SEA team which included a number of specialists who focused on the significant environmental issues of the plan as identified during the screening and scoping phases and assessment of baseline information for the area.

In carrying out the Strategic Environmental Assessment of the draft Clonakilty Development Plan 2009 - 2015, the SEA Team were involved in the Plan preparation process. The SEA Team were fully involved in the analysis of development options and were in a position to make suggestions throughout the process of plan preparation to ensure that environmental considerations and environmental effects were considered in the formulation of strategic aims and development objectives. Furthermore all environmental scoping responses, consultation submissions and mitigatory measures against potential environmental impacts were incorporated into the Policies and Objective of the Development Plan where possible.

3.0 Summary of How Environmental Considerations and the Environmental Report were Factored into the Plan

As part of the SEA Environmental Report, a matrix was developed and used to assess significant environmental effects of the key policies and objectives of the draft Clonakilty Development Plan. This process enabled an overview of where potential environmental problems may arise from implementation of the draft Plan and allowed for additional policies/objectives to be generated and included in the Plan. As a result of this process it was considered that the key environmental issues of the Clonakilty Development Plan as set out in Volume III of the Plan related mainly to biodiversity and population as set out in table 1 appended to this statement.

Where significant effects were identified and had not been mitigated sufficiently by policies and objectives within the draft Plan, additional mitigation measures were recommended and have been incorporated where possible into the Plan. Table 1 as Appended to this Statement documents all significant effects and mitigation measures as identified in the environmental report and sets out where the proposed mitigation measures have been implemented into the Plan. An appropriate assessment of the draft Plan and associated amendments was also carried out. This assessment concluded that no policies, objectives and proposals (i.e. critical infrastructure) of Clonakilty Development Plan 2009 - 2015 would potentially impact negatively, including potential 'in combination' impacts, on the conservation objectives of any Natura 2000 Site. Overall it was considered that the proposed draft Plan would not have a negative impact on the environment in this regard.

Article 10 of the SEA Directive requires Member States to monitor the significant environmental effects of the implementation of plans 'in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action'. Chapter 10 of the Environmental report sets out the monitoring proposals that will be undertaken following implementation of the policies and objectives of the Clonakilty Development Plan (these are also linked with significant effects and mitigation measures as set out in Table 1 of this statement).

4.0 Summary of how submissions/consultations were taken into account:

This section details how both the Environmental Reports and submissions and observations made to the Planning Authority on the Environmental Reports and SEA process have been taken into account during the preparation of the plan. In particular, the Manager's Reports on the Development Plan under Section 12(4) and 12(8) required under the Planning and Development Act 2000 and prepared after the formal public display periods demonstrate how particular submissions/consultations were considered. The general manner in which submissions were taken into account is outlined below.

4.1 SEA Scoping Consultations

RPS on behalf of Clonakilty Town Council undertook formal scoping with the three statutory Consultees between April and May 2008. Strategic Environmental Assessment scoping letters and reports were sent to the Department of the Environment, Heritage and Local Government (DoEHLG), Department of Communications, Marine and Natural Resources (DCMNR) and the Environmental Protection Agency (EPA).

Responses from all parties consulted were received by RPS by May 2008. Each of the scoping responses were taken into account during the carrying out of the Strategic Environmental Assessment and the preparation of the Environmental Report on the draft Clonakilty Town Development Plan.

The scoping exercise for this SEA determined the potential key environmental impacts and outlined how they should be addressed as part of the Environmental Report (this is documented in Table 2.1 of the Environmental Report).

4.2 Initial Public Consultation Period

The draft Clonakilty Town Development Plan and Environmental Report went on public display between the between 19th August to 28th October 2008 and submissions were invited from the public, from relevant statutory bodies and the Environmental Authorities. In order to document the SEA process thoroughly, the Environmental Report was updated at this stage to include suggestions and comments received from the environmental authorities and to include the assessment of significant amendments to the draft Development Plan arising from consultation of the draft Clonakilty Town Development Plan. This updated document went out to consultation with the proposed amendments.

Clonakilty Town Council received consultation responses from the Department of the Environment, Heritage and Local Government (DoEHLG) and the Environmental Protection Agency (EPA) in October 2008.

A submission from the DoEHLG's, Development Applications and National Monuments Units was received on the 28th October 2008 suggesting a number of changes to the Draft Plan in relation to architectural heritage and archaeology. No comments were received in relation to the Environmental Report.

A submission from the EPA was received on the 28th October 2008 relating to the possible impacts of the Draft Development Plan on various aspects of the environment and also included comments relating to the Environmental Report which went on public display with the draft Clonakilty town Development Plan.

Any changes necessitated as a result of the submissions received were reviewed by the SEA team and have been incorporated where appropriate into the Amendments to the Plan and documented in the various Environmental and Manager's Reports produced during the preparation of the Plan.

4.3 Assessment of Material Amendments

As a result of the initial consultation, a number of amendments were made to the draft Plan. All material amendments were assessed as part of the updated environmental report, which went on public display during the public consultation of the proposed amendments to the draft Plan. To conclude it was not considered that the proposed amendments of the draft Plan would have a significant impact on the environment.

In order to document the SEA process, since the initial Consultation draft of the Environmental Report, the environmental report was updated to incorporate suggestions and comments received from the environmental authorities and was also updated to include any assessment of the proposed material amendments of the draft Development Plan arising from the initial consultation process. This went on public display at on Thursday 30th April for a four-week period.

4.4 Adoption of the Plan

The Plan was formally 'made' at a meeting on Thursday 25th June 2009. At this meeting the Council accepted all recommendations contained in the s.12 (8) report and agreed to adopt the draft development plan as amended, including the recommended changes resulting from the Appropriate Assessment. No material changes were made to the Plan at this stage and therefore no additional amendments were assessed in terms of SEA at this stage.

5.0 Reasons for choosing the plan as adopted, in the light of other reasonable alternatives considered

Article 5 of the SEA Directive requires the environmental report to consider "reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme" and the significant effects of the alternatives selected. Therefore as part of the SEA process three alternative development strategies for the Plan area were assessed in order to determine the preferred development strategy for the Plan area with the least environmental effects. The three alternatives considered include a 'Do-nothing approach', an alternative to 'Rezone sufficient lands in accordance with national, Regional and Local projections'; and an alternative to 'Extend new development zonings on remaining undeveloped Greenfield lands in accordance with submissions to the development plan'.

Based on the policy context, issues and needs facing the town it was considered that the preferred alternative as set out in the SEA should be to rezone sufficient lands in accordance with national, Regional and Local projections through the intensification of the existing Town Centre, redeveloping brownfield sites and Greenfield sites only where there is a natural extension to existing zoning, all of which are evident in the development strategy for the plan (Volume II of the plan). Accordingly this alternative was chosen in order to address a number of the matters, including the need to provide providing sufficient zoned and serviced lands for residential, recreational and amenity purposes along with a mix of residential densities, by liaising with the County Council with a view to encourage balanced and sustainable development between the Town Council area and enabling Clonakilty and to fulfill its potential as an Integrated Employment Centre as set out in the underlying strategy of the Plan.

This scenario allows for the intensification of the town centre and the consolidation and expansion of existing services to easily accessible lands. This scenario would meet a large number of the objectives of the Town Development Plan, as it would allow the rejuvenation of existing derelict sites, which would improve the town's architectural character and townscape and consequently improve its tourist function. It would also be likely to have a positive impact on existing residents and traders in the town. Therefore alternative 2 was the alternative chosen as the development strategy for the Clonakilty Town Development Plan 2009 - 2015.

6.0 Monitoring measures

The SEA Directive requires that significant environmental effects of the implementation of a plan is monitored in order to identify, at an early stage, unforeseen adverse effects and to be able to undertake appropriate remedial action. Monitoring can also be used to analyse whether the Development Plan is achieving its Environmental Protection Objectives and targets, whether such objectives need to be reexamined and whether the proposed mitigation measures are being implemented.

The primary purpose of monitoring is to cross check significant environmental impacts which arise during the implementation stage against those predicted during the plans preparation stage.

Chapter 10 of the Environmental Report sets out the monitoring proposals to monitor significant effects and implementation of mitigation measures to be undertaken following implementation of the policies and objectives of the Clonakilty Town Development Plan (these are also linked with significant effects and mitigation measures in Table 1 below). Table 10.1 of the environmental report sets out specific potential environmental impacts and indicators and targets to allow monitoring of the quantitative trends and progress over time relating to the significant impacts.

Clonakilty Town Council is responsible to monitor the significant environmental effects arising from the implementation of the Clonakilty Development Plan 2009 – 2015. However as set out in the Cork County Development Plan 2009 potential impacts are also considered in a national, regional and local context, which can be referred to where possible. Furthermore the Cork County Planning Policy Unit are carrying out survey work in terms of the review of the Local Area Plans for the entire County, which can be referred to in terms of future monitoring for the Clonakilty Town Development Plan also.

Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)
clonakilty Bay cSAC, pNHA and SPA is under ressure from a number of sources. There is no olicy in the Plan for the protection of Clonakilty Bay and therefore this objective is considered a key equirement for the Plan.	Possibly significant if not mitigated against	SEA recommends inclusion of the following Objectives: Designated Sites. To maintain the conservation value of Clonakilty Bay (SPA and cSAC) during the lifetime of this plan and to ensure Appropriate Assessment is carried out where development projects are likely to have significant effects on this European site whether within or outside the boundary of the European Site. There is a need for a policy to undertake environmental appraisals or Environmental Impact Assessments and Appropriate Assessments in areas within or likely to affect pNHA's, cSAC's and SPAs; i.e. new roads and other infrastructure, other major developments, etc. The policies and objectives should take into account the relevant "Major Pressures reported in the assessment of	Refer to Monitorii Programme As Indicate In Table 10. B1, B2, W1,

Habitats and Species" with a view to ensuring the implementation of the plan does not increase the major pressures on habitats and species in Clonakilty and

Table 1. Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Clonakilty Town Development
Plan Environmental Report

Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)
Greenfield Development – All developments which take place on Greenfield sites are likely cause some degree of negative impact on biodiversity. Where developments i.e. roads, housing and other infrastructural developments have occurred on Greenfield sites they have replaced some semi natural and natural areas with artificial surfacing causing a gradual loss of biodiversity. Therefore it is recommended that the following policy or objective should be included within the plan; Brownfield sites should be used in preference to Greenfield sites for development.	Possibly significant if not mitigated against	adjoining areas. (Above mentioned objectives are satisfactorily addressed in sections 5.2 and 5.3 of Volume 2 of the draft Plan). SEA recommends inclusion of the following Objective: • There is a requirement to include a policy to use Brownfield sites in preference to Greenfield sites. (Above objective is satisfactorily addressed in section 5.3 of Volume 2 of the draft Plan).	Refer to Monitoring Programme As Indicated In Table 10.1: B1, B2, S1, S2, PH2
Invasive species –There is potential for invasive species to enter surface waters from a number of sources including runoff from garden centres, from boats and by dumping of waste from fish tanks and garden ponds. Threrefore it is recommended that a policy or objective for protection against invasive species is required in the new Clonakilty Town Plan.	Possibly significant if not mitigated	SEA recommends inclusion of the following Objective: • Invasive species. A policy for protection against invasive species is required in the new Clonakilty Town Plan. (Above objective is satisfactorily addressed in section 5.3 of Volume 2 of the draft Plan).	Refer to Monitoring Programme As Indicated In Table 10.1: B1

Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)
Removal of Ecological Corridors - The removal of ecological networks / corridors is a significant issue. It is recognised that there has been a significant increase in hedgerow removal throughout Ireland in recent years. It is recommended that Clonakilty Town Council undertake habitat surveys of the study area with the aim of identifying hedgerows, habitat types, priority habitats, etc. These studies will provide a mechanism for management of hedgerows and other ecological corridors in the study area.		SEA recommends inclusion of the following Objective: • There is a requirement to include a policy for the preparation of a habitat map (including wetlands) of the town. (Above objective is satisfactorily addressed in section 5.3 of Volume 2 of the draft Plan).	Refer to Monitorin Programme As Indicate In Table 10.1 B1,
There is potential for impacts to the aquatic environment in the form of industrial and agricultural run-off, municipal sources of pollution, fragmentation of river corridors and soil erosion. These risks apply in particular to the River Feagle. Under the Water Framework Directive, water quality must achieve good status" by 2015.	No significant effect proposed as a result of the implementation of the Plan.	SEA recommends inclusion of the following Objective: • To ensure that zoned land will not be developed if such development will lead to overcapacity of the Wastewater Treatment Plan to ensure that the development of zoned land will not have an impact on Clonakilty Bay. (Above objective is satisfactorily addressed in section 5.3 of Volume 2 of the draft Plan).	Refer to Monitorin Programme As Indicate In Table 10.1: A1

Table 1. Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Clonakilty Town Development Plan Environmental Report					
Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)		

Soils			
Construction works should be planned to be carried out with the least foreseeable disturbance of soils. Where possible all topsoil and subsoils excavated on site should be used during construction works. Excess fill and unsuitable excavated material should be deposited in appropriate and approved infill sites, in compliance with the Waste Management Acts 1996 to 2003 and Section 5 of the Waste Management (Collection Permit) Regulations 2001. Conversely, if the importation of topsoil is required for landscaping purposes, the material should be brought from as near a site as possible, in order to reduce transport distances.	Possibly significant if not mitigated	 The Town Development Plan should include for implementation of the policies and objectives of the Soils Directive; The Town Development Plan should include a policy for the Protection of Areas of Geological Interest; and Where development does take place best practice should be implemented to prevent soil erosion and prevent escape of suspended solids into nearby watercourses. (Above mentioned objectives are satisfactorily addressed in section 5.14 of Volume 2 of the draft Plan). 	Refer to Monitoring Programme As Indicated In Table 10.1: S1, S2, S3
Water			
In terms of water it is considered that a number of new objectives should be included within the Draft Clonakilty Development Plan 2009-2015. The Water Framework Directive (WFD) has categorised the River Fealge and streams entering the Clonakilty Bay at Ring Bar Quay as being "At Risk of Not Achieving Good Status". The plan promotes the protection of	Possibly significant if not mitigated	SEA Recommends the following New Policies/Objectives Required: • Encourage sustainable water usage (in SUDS). • Promote compliance with the Water Framework Directive and the	Refer to Monitoring Programme As Indicated In Table 10.1: W1, W2, W3, W4, M1

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Plan Environmental Report

Plan Environmental Report				
Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)	
water quality and water supply through a number of policies and objectives including the provision of adequate infrastructure and the upgrading of the wastewater treatment plant. In particular it is a policy of the plan to ensure that further provision and use of septic tanks shall not be permitted, in general, within the development boundary of the town.		 implementation of Management Plans for the South Western region. Maintain high status or good status of waters where they exist and to achieve good quality status in all other waters by 2015. Good water is measured in quantity, quality and ecology for surface water and quantity and quality for groundwater. Continue monitoring of drinking waters. Include an objective for the preparation of a water conservation strategy for Clonakilty Town. Include a Policy/objective to ensure bathing waters in Clonakilty and adjoining areas, as appropriate, achieve "sufficient or better status by 2015". (Above mentioned objectives are satisfactorily addressed in sections 6.7 and 6.9 of Volume 2 of the draft Plan). 		
Clonakilty has suffered from flooding problems as a result of elevated sea levels due to storm surges and high flows in the River Fealge, sometimes in combination. Therefore it is an objective of the plan to plan to progress the development of the Tidal Barrage across Clonakilty bay to alleviate the risk of tidal flooding within the town.	Possibly significant if not mitigated	SEA Recommends the following New Objective: To ensure that all new developments should have regard to areas that maybe at risk from flooding. Flood Impact Assessment may be required at planning application stage to identify potential loss of flood plain storage and how it is to be offset in order to minimise.	Refer to Monitoring Programme As Indicated In Table 10.1: PH2, W1	

Table 1. Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Clonakilty Town Development Plan Environmental Report			
Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)
Air and Climate		the impact on the river flood regime at application stage. (Above mentioned objectives are satisfactorily addressed in sections 6.9, 6.10 and 5.4 of Volume 2 of the draft Plan).	
Air and Climate			
Climate Change is a significant issue around the world today, therefore it is considered that consideration should be given to the promotion of Climate Change in the Plan.	Significant positive effect. Proposed Mitigation is pro-active rather than reactive.	SEA Recommends inclusion of the following or similar Objectives to help to combat Climate Change: - Sustainable forms of development and sustainable sources of energy should be encouraged in the new plan. There is a need to include a policy on sustainable building within the new plan. - The plan should encourage utilisation of energy efficient technology in office and apartment block developments. - Sustainable design should be encouraged for all new builds, which should incorporate clean and energy efficient technologies such as solar panels to provide hot water, high levels of fabric insulation, solar gain, and natural ventilation to reduce heating and cooling loads and maximise energy efficiency. - Existing vegetation and future	Refer to Monitoring Programme As Indicated In Table 10.1: E1.

Table 1. Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Clonakilty Town Developme Plan Environmental Report			own Development
Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)
		landscaping are important considerations for site selection. The minimisation of waste production during the construction process and provision for recycling of construction and demolition waste is another key factor in the design of sustainable buildings. (It is considered that section 5.13 and 6.13 adequately addresses issues of energy, sustainability and climate change)	
Material Assets			
A Traffic and Transportation study on Clonakilty Town is currently being undertaken, three options for the Clonakilty Relief Road are currently proposed in the Clonakilty Development Plan 2009 – 2015.	Potential significant effects if not assessed.	 That all new transport objectives that will be included within the plan should be assessed in terms of strategic environmental assessment and that; That mobility management planning is a condition of planning permission for any organisation, which attracts more than 100 people per day. (This objective is adequately addressed in section 6.5 of Volume 2 of the draft Plan) 	Refer to Monitoring Programme As Indicated In Table 10.1: A1

Table 1. Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Clonakilty Town Plan Environmental Report				
Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)	
Wastewater Treatment – The existing town sewerage system is currently at capacity. There is a possibility of unchecked increase in demand for wastewater treatment with potential for increased pollution to surface waters. Therefore correct treatment of wastewater is an important factor to consider in the quality of surface water.	Possibly significant if not mitigated	SEA recommends the inclusion of the following policies: • include a timescale for completion of the upgrade of the waste water treatment plant • Wastewater Treatment Plants - monitor the performance of wastewater treatment plants and the sewerage network to capture leakages to GW and SW. It is important to have an adequate wastewater collection system infrastructure in place to cope the increased population increase as outlined in the NSS. The Plan should adhere to the principles of WWTS Bye Laws in order to protect water quality and ensure that WWTP comply with EPA Manuals. (Above mentioned objectives are satisfactorily addressed in sections 5.4, 5.8 and6.11 of Volume 2 of the draft Plan).	Refer to Monitoring Programme As Indicated In Table 10.1: M1, W1, W2, W3,	

Table 1. Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Clonakilty Town Development
Plan Environmental Report

Trend & Potential Impacts	Significant Effects	Mitigation Measures (and reference to where addressed in the Plan highlighted in brackets)	Monitoring (Refer to relevant Indicators, targets and responsibilities as indicated in table 10.1)	
Cultural Heritage				
Any direct impacts on national monuments in State or Local Authority care or subject to a preservation order will require the consent of the Minister for the Environment, Heritage and Local Government under Section 14 of the National Monuments Act 1930 as amended by Section 5 of the National Monuments (Amendment) Act 2004.	Possibly significant if not mitigated	SEA recommends following text: Any direct impacts on national monuments in State or Local Authority care or subject to a preservation order will require the consent of the Minister for the Environment, Heritage and Local Government under Section 14 of the National Monuments Act 1930 as amended by Section 5 of the National Monuments (Amendment) Act 2004. (Section 4.3.2 of Volume 2 of the Plan adequately addresses this)	Refer to Monitoring Programme As Indicated In Table 10.1: CH1, CH2	
Need to ensure that archaeological inter-tidal zone and archaeological assessments are undertaken where relevant.	Possibly significant if not mitigated	SEA recommends following Policies: The archaeological potential of the coastal and inter-tidal zone, where relevant, should be carefully considered. Any potential impacts on archaeological heritage should be subject to full archaeological assessment. (Section 4.3.1 of Volume 2 of the Plan adequately addresses the above mentioned objectives)	Refer to Monitoring Programme As Indicated In Table 10.1: CH1, CH2	

Table 1. Significant Effects, Proposed Mitigation Measures and Proposed Monitoring of Clonakilty Town Development
Plan Environmental Report

Mitigation Measures (and reference to where

Monitoring (Refer to relevant

Trend & Potential Impacts	Significant Effects	addressed in the Plan highlighted in brackets)	Indicators, targets and responsibilities as indicated in table 10.1)
Landscape			
The implications of the development of the zoned lands proposed in the Plan on existing landscape form and features and on scenic views and routes should be investigated with a view to ensuring such views/ features are protected from proposed development of the area.	Possibly significant if not mitigated	It should also be an objective of the plan that the development of zoned lands within the Plan area does not impact negatively on the A89, A90 and A91 Scenic Routes in the Cork County Development Plan 2003 (\$72/\$\$73/\$74 Scenic Routes in the Draft Cork County Development Plan 2007). (Section 4.8.2 of Volume 2 of the Plan adequately addresses this matter)	Refer to Monitoring Programme As Indicated In Table 10.1: L1