

Cashel and Environs Development Plan 2009-2015

Volume 2 Environmental Report



Cashel Town Council and South Tipperary County Council



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Non-Technical Summary

Introduction

This is the non-technical summary of the *Environmental Report* for the Cashel and Environs Development Plan 2009-2015.

Due to the sensitive nature of Cashels archeology and architecture and the location of Cashel upstream of the River Suir SAC, the Council determined that the implementation of the Cashel and Environs Development Plan 2009-2015 would be likely to have significant effects on the environment.

Consequently, in accordance with the Planning and Development (Strategic Environmental Assessment) Regulations 2004, the Council carried out a Strategic Environmental Assessment (SEA) of the Cashel and Environs Development Plan 2009-2015.

The findings of the SEA are expressed in this *Environmental Report*, which was prepared alongside the Cashel and Environs Development Plan 2009-2015. The aim of the SEA is to examine the environmental consequences of implementing the Cashel and Environs Development Plan 2009-2015 on these vulnerable aspects of Cashels environment through a systematic process to ensure that potential environmental effects / impacts are correctly addressed at the earliest appropriate stage of decision-making.

Screening and Scoping

The Council examined the nature of Cashel and its Environs and prepared an overall Strategic Development Vision for the area in order to assess if a SEA was required in the first instance (Screening Process). The Council determined in consultation with the designated Environmental Agencies³ that:

- The area is characterised by a rich cultural heritage,
- The town discharges treated municipal effluent to the River Suir which is a candidate Special Area of Conservation (Lower River Suir cSAC), and,
- It is envisaged that Cashel Town and its Environs will continue to develop.

Having considered these issues an SEA was considered necessary.

In consultation with the designated Environmental Authorities the Council then determined the level and detail of information required on these aspects of the environment most likely to be adversely affected by the implementation of the Cashel and Environs Development Plan 2009-2015 (Scoping Process). In accordance with Article 6 of the EU Habitats Directive, appropriate assessment screening for any significant adverse environmental effects on Natura 2000 Sites was also carried out in consultation with the environmental authorities. It was found that there would be no significant adverse effects on the Lower River Suir candidate Special Area of Conservation as a result of the implementation of the Development Plan.

³ The EPA and the Department of the Environment Heritage and Local Government

SEA Methodology

Detailed information was gathered on the condition of the environment in Cashel and its Environs (Baseline Information). The consideration of potential development alternatives for Cashel and its Environs followed from this and those development alternatives were assessed against European, National and Local Environmental Protection Objectives and the Strategic Development Objectives (SDOs) for Cashel and its Environs.

The preferred strategy was identified and assessed. Mitigation and monitoring measures were drawn up to lessen / offset any adverse impacts on the environment that the preferred strategy may have.

Environmental Issues of Primary Relevance to scope of SEA

Implementation of the Cashel and Environs Development Plan 2009-2015 has the potential to have a significant impact on the following environmental issues:

1. Architectural Heritage
2. Archaeological Heritage
3. Views/Visual Setting/landscape
4. Surface water quality

Baseline Information

The purpose of the baseline description is to identify the current state of the environment.

The baseline description of the current physical environment of Cashel and its Environs was examined under the following headings; Architectural Heritage, Archeological Heritage, Natural Heritage and Biodiversity, Human Health and Population, Vistas, Townscapes and Landscapes and Infrastructure, with particular reference to the environmental issues of High⁴ Relevance.

Environmental Protection Objectives (EPOs)

Environmental Protection Objectives were drawn up from European, National and Local environmental policy, and are specific to the Development Plan area. The Environmental Protection Objectives aim to preserve or enhance the quality of the existing environmental conditions as outlined in the baseline information.

Development Alternatives

Three potential development alternatives were considered:

1. **Maintain Existing Development Policy Context.**
This would involve making no changes to the development vision and zoning as set out in the Cashel and Environs Development Plan 2003.
2. **Promote dispersion of development into surrounding countryside and beyond the N8 Cashel By-Pass and to permit large-scale development of land zoned for amenity use north of the Rock of Cashel.**
This would involve zoning of land outside of the N8 Cashel By-Pass and actively facilitating expansion of the built form of the town in all directions including north of the Rock.

⁴ All environmental issues were categorised (high, medium and low) as on the grounds of relevance to Cashel and their sensitivity.

3. Provide for both consolidation and expansion of existing built form where appropriate.

This would provide an emphasis on consolidation of development within the existing built form of Cashel, and facilitating development on green field sites only when there is a proven need to do so. This approach would generally retain development inside of the N8 Cashel By-Pass and limit negative impact on the setting of the Rock of Cashel.

These alternatives were tested against the Strategic Environmental Objectives (SEOs) and Strategic Development Objectives (SDOs)⁵ for Cashel and its Environs.

4. Development Plan Format

The chosen alternative was then tested against two possible Development Plan format, to determine the most effective means to present the policy of the Cashel and Environs Development Plan 2009-2015. This alternative relates not to the development strategy but to the nature and format of the Development Plan itself, as follows;

- (a) Use of overarching and broad policies – Difficult to measure their achievement.
- (b) Use of specific, easily identifiable policies and objectives – Readily measurable.

The Preferred Strategy

The chosen development alternative (option 3) (4b) will provide for *both* consolidation of built form and expansion of existing built form where appropriate, will use specific and easily measurable policies and objectives and will have the least significant adverse effect on the environment.

Significant adverse impacts on the environment have been identified and mitigated against through the integration of measures (Prescriptive Policies) throughout the Cashel and Environs Development Plan 2009-2015.

Monitoring

Article 10 of the Directive requires the monitoring of the Development Plan in order to identify at an early stage unforeseen adverse environmental effects so that appropriate remedial action can be taken. A monitoring programme with targets has been devised and is set out in Section 6 of the Environmental Report.

SEA Findings

The SEA of the Cashel and Environs Development Plan 2009-2015 has identified that the Cashel and Environs Development Plan 2009-2015 utilises the preferred development strategy for Cashel. It has identified that the Cashel and Environs Development Plan 2009-2015 may impact on certain aspects of the environment however measures (policies and objectives) have been included to mitigate these potential impacts. It has also identified that certain policies of the Cashel and Environs Development Plan 2009-2015 will have positive impacts on the environment.

⁵ Chapter 1, Cashel and Environs Development Plan 2009-2015.

SEA Statement

Cashel and Environs Development Plan 2009-2015

Introduction

Article 9 of the SEA Directive provides that when a Plan is adopted, the environmental authorities, the public and any relevant transboundary State must be informed, and the following items made available to those so informed:



Figure 1.1: Cashel City Walls

1. The Plan as adopted;
2. A statement (SEA Statement) summarising how environmental considerations have been integrated into the Plan, how the Environmental Report and the outcome of consultations were taken into account, and the reasons for choosing the Plan as adopted in the light of other reasonable alternatives considered; and
3. Monitoring measures

Recommended format for SEA Statement

The *'Implementation of the SEA Directive, Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional and Planning Authorities'*, November 2004, published by the Department of the Environmental, Heritage and Local Government, sets out the format for the SEA statement. The SEA statement should incorporate the following:

- | |
|--|
| <ol style="list-style-type: none"> (1) Summary of how environmental considerations and the Environmental Report were factored into the Plan. (2) Summary of how submissions/consultations⁶ were taken into account. (3) Reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered. (4) Summary of monitoring measures. |
|--|

SEA Statement for the Cashel and Environs Development Plan 2009-2015

(1)+(2) Summary of how environmental considerations and submissions/consultations as part of the preparation of the Environmental Report were factored into the Plan.

During the preparation of the Cashel and Environs Development Plan 2009-2015 (hereafter referred to as the Development Plan) consideration of environmental issues was closely linked to submissions received during the consultation process; therefore, items 1 and 2 set out above will be addressed together in this section.

Section 2.2 of the Environmental Report sets out the consultation processes for the preparation of the Development Plan and Environmental Report. During the process of

⁶ As consideration of environmental issues may be linked to submissions, a clear distinction between 1 and 2 may not be appropriate.

preparing the Development Plan consultation with the environmental authorities occurred at each stage.

The authorities consulted were;

- The Environmental Protection Agency (EPA), and,
- The Department of the Environment, Heritage and Local Government (DEHLG).

Consultation was carried out at screening, scoping and pre-draft stages. Detailed responses were received from the environmental authorities during the publication of the Draft Plan and Draft Environmental Report and during the publication of the proposed material amendments to both the Draft Plan and Draft Environmental Report. Responses to submissions received and the Managers recommendations were set out in the Section 12 (4) and Section 12 (8) Managers Reports.

There were three periods of detailed public consultation during the preparation of the Development Plan and Environmental Report. An issues paper was prepared at pre-Draft Stage and 45 public submissions were received. During the public consultation for the Draft Plan and Draft Environmental Report a total of 120 submissions were received, as a result of these submissions significant material amendments were proposed to the Draft Plan and Draft Environmental Report. The nature of these proposed amendments included for the following significant amendments:

- Revisions to landzoning, especially in the Windmill and Horeabbey areas. (Maps 1 & 2)
- Insertion of Special Development Objectives to provide guidance to development of sensitive sites as Appendix 9 to the Draft Plan.
- Insertion of a monitoring and review strategy as Appendix 11 to the Draft Plan.
- Insertion of a sustainable planning checklist as Appendix 10 to the Draft Plan.
- Insertion of new Figure 8.1 to illustrate indicative pedestrian routes in the central area.
- Amendment to the proposed policy for retail warehousing in Cashel.
- Insertion of new individual sections and policies for both protected views and protected trees (4.6 Listed Views and 4.7 Listed Trees).
- Insertion of new section and policy regarding the proposed Visual Sensitivity Analysis and zones of visual sensitivity for Cashel (4.5 Cashel Visual Assessment).
- Amendment to the proposed Architectural Conservation Area to include St Dominic's Abbey and the immediate grounds of St Francis Abbey (4.1.2 Architectural Conservation Area).
- Insertion of revised details of Housing Strategy Review 2008 (3.6 Housing Strategy Review 2008)

These proposed material amendments were tested for their potential environmental impacts as part of the SEA process and changes were also made to the Draft Environmental Report.

These proposed amendments and many other minor amendments were placed on public display for a period of four weeks and further submissions were invited. A further 18 public

submissions were received during this second public display period. In addition, submissions were received from the EPA and the DEHLG. As a result of these submissions significant material amendments were proposed to the Draft Plan and Draft Environmental Report as amended by the proposed material amendments. These further material amendments were set out in the Section 12 (8) Managers Report as follows;

- Amendment to land zoning at Coopers Lot (Map 1 and Appendix 3)
- Insertion of new text regarding process of SEA (1.5.1 Strategic Environmental Assessment)
- Insertion of new text to clarify location of sites where specific housing densities are applicable (3.3 New Residential Development)
- Insertion of new text, diagram and policy for Visual Assessment prepared by Arc Architectural Consultants Ltd (4.5 Cashel Visual Assessment and Map 5)
- Amendment to Retail Policy for Cashel (6.4 Retail Function of Cashel Town)
- Amendment to both the Coopers Lot and Wallers Lot Master Plans (Appendix 3)

These proposed material amendments were tested for their potential environmental impacts as part of the SEA process and changes were also recommended to the Draft Environmental Report.

The Managers Recommendations to amend the Draft Plan and Draft Environmental Report as amended by the proposed material amendments were presented to the Elected Members at the Council meetings of May 2009. The Elected Members decided to make the Development Plan and Environmental Report as amended, subject to Members Directions as follows:

- Revision to Landzoning at Windmill by reinsertion of the zoning of a field (approximately 11 acres) to industrial and employment use, subject to a new special development objective to mitigate any potential impacts.
- Revision to local indicative routes at Coopers Lot.
- Insertion of new text to Coopers Lot Master Plan regarding protection of way leave to existing swallow-hole.

(3) *Reasons for choosing the Plan as adopted, in the light of other reasonable alternatives considered.*

Possible alternative Development Plan scenarios are discussed in detail in Section 4.2 Alternative Plan Scenarios, of the Environmental Report. Three potential scenarios were considered. These scenarios were evaluated for their performance against both the Strategic Development Objectives (SDOs) (based on the Strategic Vision for Cashel) and the key Strategic Environmental Objectives (SEOs) for Cashel. The potential for each Development Plan scenario to have the following impacts was determined;

- A Positive Impact on the SEOs and SDOs.
- A Mitigable Impact on the SEOs and SDOs.
- Non-compatible with the SEOs and SDOs.

Please refer to Table 4.1 of the Environmental Report for full assessment. The results of the assessment were as follows:

Scenario	Number of Positive Impacts	Number of Mitigable Impacts	Number of non-compatible instances
Maintain existing plan context and retain 2003 Plan	0	13	2
Promote dispersion of development beyond the N8 Cashel By-Pass and into the rural countryside	0	2	13
Consolidation of existing built form. Dispersion only where appropriate.	10	5	0

Based on the assessment of potential scenarios against the key development objectives it was found that the chosen Development Plan scenario would have 10 positive impacts, 5 mitigable impacts and no non-compatible impacts, and therefore represents the most reasonable development alternative.

(4) *Summary of monitoring measures.*

Monitoring measures are set out in Section 5.0 of the Environmental Report. These refer to ongoing measurement of the environmental impacts (either positive/negative) of the implementation of the Development Plan. These environmental monitoring measures will be supported by the general monitoring measures set out as Appendix 11 of the Development Plan and which will inform the Section 15 (2)⁷ 2-year Progress Report for the Development Plan.

A total of 15 Environmental Monitoring measures are set out in Table 5.1 of the Environmental Report. A selected indicator and a selected target is set out for each monitoring measure and the department/source responsible for each measure is identified. Each aspect of the receiving environment has specific monitoring measures as follows:

Cultural Heritage:	6 Monitoring measures
Water:	3 Monitoring measures
Landscape:	1 Monitoring measure
Population and Human Health:	1 Monitoring measure
Material Assets	4 Monitoring measures

Conclusion

Cashel Town Council and South Tipperary County Council have fully integrated the SEA process throughout the preparation of the Cashel and Environs Development Plan 2009-2015 and have considered how environmental considerations have been integrated into the Development Plan, how the Environmental Report and the outcome of consultations were taken into account, and the consideration of reasons for choosing the Development Plan as adopted in the light of other reasonable alternatives. Based on this process, the Council is satisfied that the implementation of the Development Plan will not have any significant adverse impact on the environment.

⁷ Planning and Development Acts 2000-2007

1.0 Introduction

The review process of the Cashel and Environs Development Plan 2003 commenced on the 29 September 2007. As part of the review process a Strategic Environmental Assessment (SEA) of the likely significant effects of implementing the Cashel and Environs Development Plan 2009-2015 was carried out in accordance with the requirements of Directive 2001/42/EC of 27 June 2001, on the assessment of the effects of certain plans and programmes on the Environment – commonly known as the SEA Directive, which was transposed into law under the Planning and Development (SEA) Regulations 2004.

The following document is an Environmental Report prepared as part of the SEA for the Cashel Town and Environs Development Plan 2009-2015. This report should be read in conjunction with the Development Plan itself. The Development Plan will remain in place for six years providing a framework for the overall sustainable development of Cashel and its Environs.

The preparation of a SEA for the Cashel and Environs Development Plan 2009-2015 was not a mandatory requirement of the SEA Regulations¹, however, in view of the architectural and archaeological heritage of the Plan area and sensitivity of the receiving waters of the River Suir it was considered that the implementation of the Cashel and Environs Development Plan 2009-2015 may have significant effects on the environment.

In view of this the Planning Authority decided to carry out a SEA as part of the process of and during the preparation of the Development Plan.

1.1 SEA and Environmental Report

The Strategic Environmental Assessment Directive (2001/42/EC) states:

'The objective of this Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes...with a view to promoting sustainable development.'

SEA is the formal, systematic evaluation of the likely significant effects of implementing a plan or programme before a decision is made to adopt the plan or programme.

As part of this, it gives the public, designated Environmental Authorities and other interested parties an opportunity to comment and to be kept informed on decisions that may impact on the environment and how they were made.

The SEA process includes the following outputs:

- (a) Scoping Report – identifies primary environmental issues and states how the scoping responses of the Environmental Authorities were taken account of in preparing the Environmental Report.
- (b) An Environmental Report - a report containing the findings of the SEA regarding the likely significant effects on the environment of the Cashel and Environs Development Plan 2009-2105.

¹ 13A – Determination of the need for environmental assessment of a Development Plan, SEA Regulations 2004.

- (c) An SEA Statement - identifies how environmental considerations and consultation have been integrated into the final adopted Cashel and Environs Development Plan 2009-2015.

This Environmental Report for the Cashel Town and Environs Development Plan 2009-2015 and has been carried out with in accordance with Schedule 2B of S.I. 436 of 2004⁸, which sets out the information to be included in this Environmental Report. In accordance with Article 6 of the EU Habitats Directive, appropriate assessment screening for any significant adverse environmental effects on Natura 2000 Sites was also carried out in consultation with the environmental authorities. It was found that there would be no significant adverse effects on the Lower River Suir candidate Special Area of Conservation as a result of the implementation of the Development Plan.

The Draft Cashel and Environs Development Plan 2009-2015 and Draft Environmental Report were published for public consultation in July 2008; as a result of this consultation process proposed material amendments were published in February 2009 for a second consultation period. Following these consultation processes, the final Cashel and Environs Development Plan 2009 and Environmental Report were published in June 2009.

1.2 Objectives/Vision of the Development Plan 2009-2015

The Development Plan 2009-2015 will provide a framework for the future development of Cashel and its Environs. A Strategic Vision for Cashel and its Environs is set out in Chapter 1 of the Development Plan.

The objectives of the Strategic Vision are as follows;

- ✓ To promote a balanced spatial growth pattern in Cashel and its Environs and to promote a renewed focus on the Town Centre
- ✓ To facilitate and promote the development of the tourism economy of Cashel Town and Environs by harnessing the existing tourism potential.
- ✓ To balance the demands of a vibrant economy with the need for a healthy and sustainable environment and to ensure the protection of the unique built and cultural heritage of Cashel.
- ✓ To promote employment and industry by acknowledging the locational advantages of Cashel and the existing potential for local industry and produce.
- ✓ To enhance and promote Cashel Town and Environs as a quality living environment for existing and future residents.

In order to achieve this vision a number of Strategic Development Objectives (SDOs) have been identified and addressed in the Development Plan.

Strategic Development Objectives

- (a) Provision of a more balanced spatial growth pattern for Cashel and its Environs and to promote a renewed focus on the Town Centre.

⁸ Planning and Development (SEA) Regulations 2004

- (b) Provision of planned infrastructure and services network in conjunction with a new internal local transport network.
- (c) Management and protection of the built, cultural and natural heritage assets of Cashel and improving public accessibility to existing features.
- (d) Provision of new housing, amenities and facilities for the growing population of Cashel, to promote a socially inclusive community, to enhance the quality of life for the existing and future population, and to promote accessibility for all sectors of the population.
- (e) Facilitation and promotion of a strong tourism economy, by focusing on and recognising both the strengths of Cashel and the needs of visitors.
- (f) Promotion and strengthening of the Town Centre as a vibrant base for residents and tourist alike.
- (g) Provision of core areas of enterprises, employment and industry in the town adjacent to key infrastructure and existing employment uses.
- (h) Facilitation of appropriate gateway development and gateway features on the approaches to the Town at strategic locations.

Figure 1.1 Chapter 1, of the Development Plan, illustrates the Strategic Vision.

The Development Plan (and accompanying Environmental Report) is consistent with National and Regional plans, policies and strategies, and guidelines issued by the Minister of the Environment Heritage and Local Government (DEHLG), which relate to the proper planning and sustainable development of the area.

1.3 Legal status of the Cashel and Environs Development Plan 2009-2015

The Cashel and Environs Development Plan 2009-2015 has been prepared in accordance with the Planning and Development Act (PDA) 2000-2007, and was adopted on 11th May 2009.

Section 9(3)(a) of the PDA 2000-2007 specifies that Cashel Town Council may make a single Development Plan for Cashel Town and its Environs. The Plan area is illustrated in Appendix 2 of this Environmental Report. The Cashel and Environs Development Plan 2009-2015 includes lands in both the Cashel Town Council administrative area and the South Tipperary County Council administrative area.

The Development Plan (with SEA Statement) became effective on 08th June 2009 (four weeks after its adoption) and will be in place for a period of 6 years.

1.4 Scale, Type and Location of Development Envisaged

Cashel is designated as a Secondary Service Centre in the Settlement Strategy for South Tipperary⁹. The Development Plan aims to achieve the Strategic Vision for Cashel as set out in Section 1.2 of the Development Plan itself.

⁹ Set out in the Settlement Strategy, Chapter 3 of the South Tipperary County Development Plan 2009

The role of Cashel is to act as a service centre for its urban and rural catchment population and to act as a driver for development. Over the lifetime of the Development Plan the residential function of Cashel will be strengthened, retail/employment/heritage functions improved and its overall perception as a desirable place to live and work will be promoted and enhanced.

Cashel Town currently has a population of 2,936¹⁰ this represents a 3.5% share of the County population. It is projected that if Cashel continues to grow at current growth rates it will have a population of 3653 by 2020 and will retain its 3.5% share of the county population.

In order to facilitate growth of the town, lands are zoned for development (Set out in Map 1 and 2 of the Development Plan. In order to provide detailed direction, four key Master Plan Areas have been identified.

Table 1.1 Master Plan Areas			
Type of development	Master Plan	Location	Area
Residential/ Mixed use	Deerpark	Golden Road	30.6ha
Employment and industry and residential	Coopers Lot	Clonmel Road	51.5 ha
Employment and industry	Waller's Lot	Clonmel Road	31 ha
Town Centre	St Patricks Rock	Main Street	6.5 ha

These areas will provide for key areas of industrial/employment and residential growth. It is envisaged that new tourism facilities will be developed at key locations within the Town Centre and as part of Master Plan development where specified.

1.5 Relationship with other Plans and Guidelines

Ireland's planning system is described as a 'plan-led' system, based on a hierarchy of plans. The plans lower down in the hierarchy must reflect the policy approach of the plans above it in the hierarchy. The Cashel Town and Environs Development Plan 2009-2015 is nested in a hierarchy of plans and strategies at the National, Regional and Local levels. In effect the Development Plan takes existing macro scale plans and strategies and applies them at a micro level scale to the circumstances of Cashel Town and Environs.

In the interest of consistency the Development Plan must be well related to other plans and strategies, hierarchically e.g. National Spatial Strategy, South Tipperary County Development Plan 2009-2015 and horizontally e.g. County Housing Strategy, County Retail Strategy.

The South Tipperary County Development Plan 2009-2015 is the primary planning document that sets the policy context for the preparation of lower tier plans such as local area plans. The South Tipperary County Development Plan 2009-2015 sets out a settlement strategy, to which the Cashel and Environs Development Plan 2009-2015 must adhere.

The Cashel Town and Environs Development Plan 2009-2015 is placed on the same planning hierarchy as the South Tipperary County Development Plan 2009 – 2015, however, the Cashel and Environs Development Plan 2009-2015 relates to a much smaller

¹⁰ CSO 2006

geographical area within South Tipperary, and will thus provide a framework for lower tier plans only e.g. Master Plans. Table 1.2 below sets out the relevant plans and strategies considered in the preparation of the Cashel and Environs Development Plan 2009-2015.

Table 1.2: Plan Hierarchy	
National Spatial Strategy 2002-2020	A 20-year planning framework that aims to achieve a better balance of social, economic and physical development across the Country supported by more effective planning. The strategy is based on a hierarchy of settlement: Gateways, Hubs and County Towns along with the need to support the role of smaller towns, villages and diverse rural economies.
National Development Plan 2007 –2013	Identifies investment funding for significant projects in sectors such as health services, social housing, education, roads, public transport, rural development, industry, water and waste services. The NDP is designed to strengthen and improve the international competitiveness of the Country so as to support continued, but more balanced, economic and social development in line with the NSS.
South East Regional Planning Guidelines 2004 – Main Objectives	The objectives of the SERPGs 2004; <ul style="list-style-type: none"> ❖ To ensure sufficient provision of public services to allow for orderly development. ❖ To facilitate the creation of jobs and industrial development to meet employment needs. ❖ To maintain and develop existing towns and villages. ❖ To develop and renew obsolete areas. ❖ To preserve and improve amenities. ❖ To regulate and control development in the interest of the common good.
South Tipperary County Development Plan 2009-2015	The objectives of the County Development Plan 2009-2015; <ul style="list-style-type: none"> ❖ Direct new residential development to settlement centres ❖ Promote a settlement hierarchy in the County ❖ Drive economic growth ❖ Protect the key assets of the county
South Tipperary County Housing Strategy Review 2008, and any review thereof.	Provides for housing requirements of the County.
South Tipperary Spatial Strategy 2002	Sets out the role of the county in the National Spatial Strategy. 2002-2020
South Tipperary County Retail Strategy 2003, and any review thereof.	Provide for new retail development in a balanced manner
South Tipperary County Heritage Plan	Set out polices to promote and protect heritage of the County
Cashel and Environs Development Plan 2003	Policy framework for Cashel Town and Environs area until 2009

Cashel Public Realm Plan Cashel Town Centre Strategy Cashel City Walls Conservation Plan Cashel City Walls Management Plan	Existing local level plans considered as part of the preparation of the Cashel and Environs Development Plan 2009-2015.
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1.6 Summary

The SEA Directive provides for considerable flexibility concerning the scope and level of detail to be included in the Environmental Report. The hierarchy of land-use plans means that the level of detail will vary considerably between the different levels of in the hierarchy¹¹.

As set out above, the Cashel and Environs Development Plan 2009-2015 and the South Tipperary County Development Plan 2009-2015 are both at the same level in the hierarchy however, the implementation of the Cashel and Environs Development Plan 2009-2015 has limited potential to impact on certain issues which generally have effects which are associated with county or regional/national levels etc. i.e. climate change, non-local transport patterns etc. Therefore, the Cashel and Environs Development Plan 2009-2015 should be considered in conjunction with the South Tipperary County Development Plan 2009-2015.

¹¹ 3.14 - Implementation of the SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment, Guidelines for Regional Authorities and Planning Authorities, DEHLG 2004.

2.0 SEA Methodology

2.1 Process of SEA

The process for SEA is set out in the Implementation of the SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment – Guidelines for Regional Authorities and Planning Authorities, November 2004, published by the DEHLG. This SEA has also considered the EPA consultation SEA Process Checklist, published January 2004. The key stages, tasks and outputs set out below in Figure 2.1 are derived from the EPA Consultation Checklist and informed the format used in this SEA¹²:

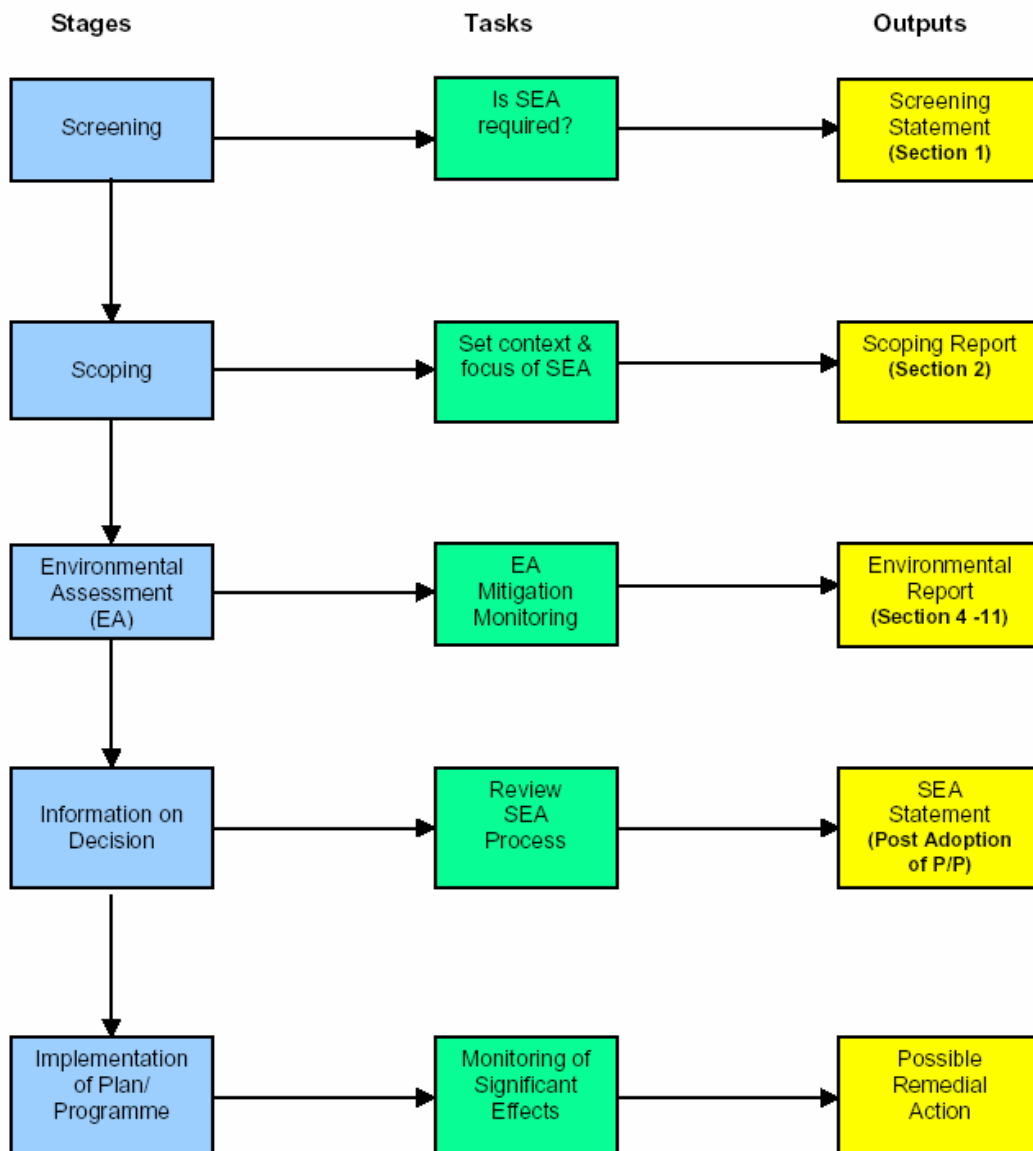


Figure 2.1: SEA Stages

¹² EPA SEA Process Checklist Consultation Draft 18 January 2008

The format of this Environmental Report is derived from the key SEA stages, tasks and outputs as set out above and can be summarised as follows:

1. Introduction to and familiarisation with the SEA process (Chapter 1).
2. Setting out the background to the Cashel and Environs Development Plan 2009-2015 (Chapter 2).
3. Consultation with the Environmental Authorities, the Public and Officials within the Planning Authority (Chapter 2).
4. Compilation of and setting out of Baseline Environmental Data (Chapter 3).
5. Determine Strategic Environmental Objectives (Chapter 3).
6. Assess performance of Strategic Environmental Objectives and Strategic Development Objectives against Alternative Plan Scenarios to determine preferred Plan Strategy (Chapter 4).
7. Compare Strategic Environmental Objectives against Strategic Development Objectives to determine the likely significant effects of the implementation of the Cashel and Environs Development Plan 2009-2015 (Appendix 1 - Matrix).
8. Determine Mitigation Measures for lessening of adverse environmental effects (Chapter 4).
9. Prepare Monitoring Programme of significant environmental effects (Chapter 5).
10. Prepare Non-Technical Summary (after completion of Environmental Report).
11. Prepare SEA Statement (after adoption of Cashel and Environs Development Plan 2009-2015).

2.2 Consultation with Environmental Authorities

Under SEA Regulations SI No. 435 of 2004, designated Environmental Authorities must be consulted in relation to the scope and level of detail to be included in the Environmental Report. Consultation with environmental authorities was a key element in the preparation of the Environmental Report for the Cashel and Environs Development Plan 2009-2015. The following authorities were notified at both screening stage (consideration of whether a SEA is required) and scoping stage (scoping report issued to them).

- The Environmental Protection Agency (EPA); and
- The Department of the Environment, Heritage and Local Government (DEHLG)

These were consulted initially in order to determine the scope and the level of detail to be included in the Environmental Report. A scoping document was submitted to the authorities to facilitate this consultation. These environmental authorities were also consulted during the public consultation periods at pre-draft, draft and material amendment stages during the Plan review procedures and comments were received in relation to the Development Plan and associated SEA processes. The responses received from these environmental authorities

were taken account of when preparing the Cashel and Environs Development Plan 2009-2015 and the Environmental Report. Table 2.1 sets out details of responses received from Statutory Consultees throughout at screening and scoping stages;

Table 2.1: Responses received from Statutory Consultees: Scoping and Screening Stages		
Date received	Received from	Details
10.09.07	Department Environment Heritage and Local Government (DEHLG)	Comments were made under three headings – Archaeology, Architecture and Nature Conservation. It was recommended that a SEA be carried out for the review of the plan, due to the architectural heritage of the town and the need to protect this and due to the effect of increased loading on the existing wastewater treatment plant and the potential impact on the River Suir Candidate Special Area of Conservation.
05.12.07	Department Environment Heritage and Local Government	Response to notification to the DEHLG of the intention to prepare a SEA. Detailed comments were made under three headings – Archaeological, Architectural Heritage and Nature Conservation. Refers to plans and strategies to be considered as part of the preparation of the Cashel and Environs Development Plan 2009-2015, sets out the most significant issues to be considered by the planning authority regarding heritage, and nature conservation.
16.04.08	Department Environment Heritage and Local Government	Detailed and useful comments were received under the following headings; <ul style="list-style-type: none"> • Archaeological Objectives, • Law and Statutory obligations of Cashel, Town Council, • Format of Development Plan, • Contents of Development Plan, • Archaeological\Heritage and the Development Plan.
03.12.07	Department Environment Heritage and Local Government Anthony Byrne	Comments were made with respect to architectural heritage. Attached guidance with regards scoping for SEA. It was stated that a detailed survey of built heritage should be undertaken to ensure that the environmental report is complete with regards architectural heritage.

18.04.08 and ongoing discussions	EPA, Regional Inspectorate Inniscarra, Cork.	Detailed discussions have been ongoing with the EPA and will continue over the preparation process for the SEA. Written response set out strategic environmental considerations.
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Detailed submissions were also received from the EPA and the DEHLG at Draft Plan stage and at proposed Material Amendment Stages, as follows:

Table 2.2: Responses received from Statutory Consultees: Draft Plan and Proposed Material Amendment Stages		
Date received	Received from	Details
17.10.09	Scientific Officer, EPA, Regional Inspectorate, Inniscarra, Co. Cork	A detailed discussion and summary of submission is set out in the Section 12 (4) Managers Report. In addition, the Managers Recommendations are also set out and illustrate how the detailed comments made were integrated into the Plan making process.
29.09.08	Spatial Policy Section, DOEHLG, Custom House, Dublin 1	A detailed discussion and summary of submission is set out in the Section 12 (4) Managers Report. In addition, the Managers Recommendations are also set out and illustrate how the detailed comments made were integrated into the Plan making process.
23.03.2009	Scientific Officer, EPA, Regional Inspectorate, Inniscarra, Co. Cork	A detailed discussion and summary of submission is set out in the Section 12 (8) Managers Report. In addition, the Managers Recommendations are also set out and illustrate how the detailed comments made were integrated into the Plan making process.
24.03.2009	Spatial Policy Section, DOEHLG, Custom House, Dublin 1	A detailed discussion and summary of submission is set out in the Section 12 (8) Managers Report. In addition, the Managers Recommendations are also set out and illustrate how the detailed comments made were integrated into the Plan making process.

2.3 Consultation with the public

Pre-draft public consultation took place from the 01 October 2007 to 27 November 2007. An issues paper was made available during this time and all submissions that were received relating to environmental issues and concerns informed the commencement of the SEA process. All submissions (45) received were summarised in the Section 11 (4) (a) Manager's Report that was submitted to the Elected Members on the 22 January 2008. Thereafter, the Draft Plan and Draft Environmental Report were prepared. Draft Plan and Draft Environmental Report public consultation took place from 21 July 2008 to 29 September 2008, 120 submissions were received and were summarised in the Section 12 (4) Managers Report. This Managers Report was submitted to the Elected Members on 17 December

2008, and recommendations were set out to amend the Draft Plan as a result of submissions received. Public consultation took place for the proposed material amendments to the Draft Plan and Draft Environmental Report from 23 February to 24 March 2009, 18 submissions were received and were summarised in the Section 12 (8) Managers Report. This Managers Report was submitted to the Elected Members on 16 April 2009. The Managers recommendations to amend the Draft Plan and Draft Environmental Report as amended by the proposed material amendments were agreed by the Elected Members and on the 11th May 2009 the Development Plan was adopted subject to three Members Directions.

2.4 Interdepartmental consultation

Inter-departmental contact was established within the Council for both the preparation of the Cashel and Environs Development Plan 2009-2015 and the SEA to ensure that a broad range of expertise was available to input into the processes.

Representatives from the Roads, Housing, Waste Management, Water Services and Environment Sections were consulted with. They were consulted at the various stages in the process and they made valuable contributions towards identifying significant environmental issues, drafting the environmental protection objectives, assessing the policies and considering alternatives.

2.5 Process used and difficulties encountered

Both the Cashel and Environs Development Plan 2009-2015 and SEA were prepared in house within the Planning Section and in consultation with all sections of the Council. During the preparation of the Scoping Report and Environmental Report, information was gathered from existing sources of data and no new research was undertaken.

Data sources included;

- ❖ Environmental Protection Agency
- ❖ The Heritage Data that has been collated by the DEHLG, the Heritage Council and South Tipperary County Council
- ❖ The National Inventory of Architectural Heritage
- ❖ Geological Survey of Ireland (GSI)
- ❖ Central Statistics Office (CSO)
- ❖ National Roads Authority (NRA)

The timeframe for the preparation of the South Tipperary County Development Plan 2009-2015 was slightly ahead of the Cashel and Environs Development Plan 2009-2015 therefore, this has provided for the valuable sharing of information for both SEA processes.

The urban area of Cashel Town and its Environs has expanded beyond the Cashel Town Council Boundary and into the area administered by South Tipperary Council. This presented difficulties during data gathering as both South Tipperary County Council and Cashel Town Council had to be consulted.

It was found that data was not always readily available at a level that applied to Cashel Town and Environs area, this was most apparent for noise, air quality, climate, groundwater vulnerability and geology for the Cashel area. GSI data is available at a county level and is available for the Cashel area however; this data is not designed for application at local level.

2.6 Scope of the SEA

The scope of the SEA must adhere to the provisions of Annex 1 of the SEA Directive and the points set out in Schedule 2 and Schedule 2 B of SI 435 and SI 436. The SEA scoping process identified environmental issues to be considered as part of the preparation of the Cashel and Environs Development Plan, for the period 2009 – 2015.

The scoping process considered all environmental issues relevant to the preparation of the Cashel and Environs Development Plan 2009-2015. However, in the interest of ensuring that the most significant issues were given due consideration, all environmental issues were ranked in accordance with their importance and sensitivity i.e. High, Medium and Low relevance. This ranking process was guided by the details received during the consultation with the designated environmental authorities.

2.6.1 Environmental issues of high relevance to scope of SEA

The implementation of the Cashel and Environs Development Plan 2009-2015 has the potential to have a high level impact on the following:

- Architectural Heritage
- Archaeological Heritage
- Views/Visual Setting/landscape
- Surface water quality.

2.6.2 Environmental issues of medium relevance to scope of SEA

Implementation of the Cashel and Environs Development Plan 2009-2015 has the potential to have a medium level environmental impact on the following:

- Human Health and population
- Flora and Fauna
- Biodiversity
- Noise
- Material Assets
- Ground Water quality

2.6.3 Environmental issues of low relevance to scope of SEA

The SEA Directive provides for considerable flexibility concerning the scope and level of detail to be included in the Environmental Report. The Cashel and Environs Development Plan 2009-2015 and the South Tipperary County Development Plan 2009-2015 are both at the same level in the plan hierarchy however; the implementation of the Cashel and Environs Development Plan would have limited potential impact on certain issues. Such issues of low relevance to the scope of the SEA include;

- Air
- Climate
- Travel Patterns

The scope of the SEA must adhere to the provisions of Annex 1 of the SEA Directive (2001/42/EC) and the points set out in Schedule 2 and Schedule 2 B of SI 435 and SI 436¹³ and therefore, all relevant environmental issues are examined in this SEA.

¹³ European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (S.I. 435 of 2004) & Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. 436 of 2004)

3.0 Baseline Environment and Environmental Protection Objectives

The SEA Directive (2001/42/EC) Article 5 Annex 1 (b), (c) and (d) requires that the following issues be addressed in the Environmental Report:

- (a) Are the relevant aspects of the current state of the environment described?
- (b) Are any existing environmental problems described (in particular those relating to areas designated pursuant to the Birds and Habitats Directives)?
- (c) Are the environmental characteristics of areas that are likely to be significantly affected by the Development Plan identified?
- (d) Is the likely evolution of the existing environment without the implementation of the Development Plan described?
- (e) Have any significant gaps in the baseline data been identified?
- (f) Have alternative/proxy data sources been identified where existing baseline data is unavailable?

3.1 Baseline environment, environmental receptors and evolution of the environment without implementation of the Plan.

The purpose of the baseline description is to identify the current state of the environment against which the likely effects of implementing the Development Plan can be assessed.

The evolution of the environment without implementation of the Cashel and Environs Development Plan 2009-2015 or 'do nothing' scenario predicts the implications for each environmental receptor that would occur in the absence of the Cashel and Environs Development Plan 2009-2015.

3.1.1 Architectural Heritage

The Rock of Cashel

St Patrick's Rock dominates the northern side of Cashel and the majority of the principle approaches to the Town. The complex of buildings on the Rock include a round tower, the Hiberno-Romanesque Cormacs Chapel, the thirteenth-century cathedral, the Bishops Tower house and other buildings dating from the 15th century¹⁴.

Each of these buildings is of national value but their collective significance contribute to the international importance of the site. It is this international significance that has resulted in the proposal to list the Rock of Cashel on the tentative list for selection as a UNESCO World Heritage Site.

¹⁴ Cashel, Co. Tipperary A study of Planning and Development in a Historic Town, The Heritage Council 2002.



Figure 3.1 View of the Rock from the Old Dublin Road

The Town of Cashel

Cashel Town itself has a distinct character and has significant architectural heritage and thus, is listed as a Heritage Town¹⁵. The Main Street curves from the west at Lower Gate to northwest at the junction of Bank Place and Friar Street. The junction of these two latter streets was the focus of the medieval town.

The town's principle streets are lined with attractive two or three storey buildings, some with very fine Victorian or Georgian facades. At the centre of Main Street on its northern side is the entrance to the Cashel Palace Hotel. This former Bishops Palace designed by Sir Edward Lovett Pearce and built in 1730 –32 by Archbishop Bolton, is two storeys over basement in height and seven bays wide and is considered to be one of the finest houses of its period in Ireland.

The lands and gardens to the rear of the Cashel Palace Hotel link directly with the Rock of Cashel and offer the best potential linkage with the Rock and the Main Street.

Main Street is split in two by a narrow row of properties including the freestanding City Hall and the Water Tower. Adjacent to these structures is a group of four buildings that contribute to a scene of enclosure and character on Main Street.

Other buildings of note in Cashel Town include the Catholic Church on the site of the former Franciscan Friary, the Cathedral and graveyard of St John the Baptist, The Bolton Library, the Gothic revival Methodist Church (Chez Hans) and the Courthouse.

¹⁵ The Heritage Council of Ireland, 1995.

The Cashel Public Realm Plan contains details on potential routes throughout the town, which would provide greater access to its heritage.

Record of Protected Structures and National Inventory of Architectural Heritage (NIAH)

A total of 105 structures have been identified in the Record of Protected Structures (RPS), Appendix 5 of the Cashel and Environs Development Plan 2009-2015. This includes 30 additions to the RPS. The new RPS includes 82 structures that are listed on the National Inventory of Architectural Heritage (NIAH) published for South Tipperary in December 2007. The RPS identifies buildings and structures of merit and also includes for certain upstanding archaeological remains and monuments e.g. the City Walls and Windmill Rath.

Town Walls and Fortifications

The City Walls of Cashel were constructed in the period 1317 to 1326 and their construction has been attributed to Archbishop William FitzJohn. The City Walls enclosed an area of 14 hectares and was originally 1,550 metres in length. Five gates punctuated the City Wall. The existing street lines in the core of the town preserve the form of the medieval walled borough with its five gates at the lower end of Main Street, at Canopy Street, Chapel Lane, Friar Street, and John Street. In 1647 during the civil wars of the mid-seventeenth century Cashel Town was besieged and the town and presumably its gates and walls was severely damaged and burned.

Thereafter the gates and walls appear to have gone into decline and by the late eighteenth century the walls and gates no longer had any defensive function and were decayed and broken¹⁶. Casual alteration and destruction has eaten away at the structure over the intervening period. However substantial but isolated portions of the City Wall survive around the original enclosed area.

Cashel Town Council in association with the Heritage Council commissioned a City Wall Conservation Plan and associated Management Plan (2008) to identify measures to protect and manage the remaining City Walls. The City Walls Conservation Plan contains a detailed study and description of the existing City Walls.

The City Walls of Cashel are listed as a protected structure (RPS 7) in the Cashel and Environs Development Plan 2009-2015 and are recorded in the Urban Archaeological Survey of County Tipperary South Riding.

Architectural Conservation Area (ACA)

An ACA and ACA statement have been included in the Cashel and Environs Development Plan 2009-2015, Appendix 4. The ACA encloses Cashel Palace Hotel, John the Baptist Church, St Dominics Abbey and grounds, the Convent and St Francis Abbey and grounds, the Main Street and the western side of Ladyswell Street.

It was recommended by the DHELG¹⁷ that due to the architectural nature of the areas lying both north and south of the Main Street (Main Spine) that there might be opportunity to consider the use of a number of different Architectural Conservation Areas, which would give recognition to the separate character of each of these areas.

¹⁶ Cashel City Walls Conservation Plan, 2008.

¹⁷ Anthony Byrne, DoHELG, 04 Dec 07.

However, it was considered that Cashel town centre with its eclectic mix of architecture warranted a single ACA inclusive designation. The ACA has been reduced from its original area as set out in the 2003 Plan in order to ensure that the ACA area closely adhered to the definition and purpose of an ACA as set out in the Architectural Heritage Protection Guidelines for Planning Authorities (2004) published by the DEHLG. However, standalone protected structures and their attendant grounds located outside of the ACA will remain protected in both their character and setting in accordance with the Planning and Development Act, 2000-2007.

Setting of Architectural Heritage

The architectural heritage of Cashel is dependant on the protection and enhancement of its visual setting and panoramic views. The Rock of Cashel is dramatically set in an unspoilt countryside when viewed from the north and this contributes to the character of the Rock.

In addition a number of local views towards the Rock from within the town and on elevated points in the town provide excellent views in close proximity to the Rock i.e. Palmers Hill. The character of the town itself is dependant on the visual quality of its streetscapes and urban vistas.

The visual setting of both the Rock of Cashel and the town itself will be an important consideration in the protection of the architectural heritage of Cashel. The development potential of Cashel and further development proposals must be carefully considered against the need to preserve and enhance the architectural setting of Cashel and its Environs.

In view of this a detailed visual assessment of the setting of the Rock of Cashel and views from the Rock was carried out during the preparation of the Development Plan. This was commissioned by the DEHLG in conjunction with Cashel Town Council and prepared by Arc Architectural Consultants Ltd. Extracts from the Visual Assessment is set out in Appendix 2 of the Environmental Report and the provisions of the Visual Assessment have been incorporated into the Development Plan, Section 4.5 Cashel Visual Assessment, however, the main Visual Assessment is available as a stand-alone technical support document.

Consequence of absence of Development Plan

The architectural heritage of Cashel has been afforded protection under the existing Cashel and Environs Development Plan 2003. However, without a detailed assessment of existing features of architectural importance and the impact of recent developments in the town, features could become lost or degraded.

Opportunities for the identification of walkways and routes, views and urban connectivity's, which would give public access to existing architectural features, could be lost if not clearly identified prior to further development in the town. There is a risk that recent strategies such as the Public Realm Plan, Town Centre Strategy and City Walls Conservation and Management Plan, would not be viewed in an inclusive manner and would therefore become much less effective.

Without a conscious effort to identify, preserve and promote the City Walls of Cashel, i.e. though the Conservation Plan and Public Realm Plan, the significance of the walls to the town could be further eroded.

The absence of the Cashel and Environs Development Plan 2009-2015 would result in the loss of an opportunity to make proposed additions to the Record of Protected Structures, thus, potentially leading to loss of structures and features of special interest.

In the absence of the protective policies and objectives of the Cashel and Environs Development Plan 2009-2015, it is likely that the unique built heritage and features of Cashel could become lost through overdevelopment and insensitive development.

Significantly, the potential of the Rock of Cashel to be listed as a World Heritage Site could be damaged through insensitive development in the vicinity of the Rock that would detract from its unique setting.

3.1.2 Archaeological Heritage

Urban Archaeology

The entire area of the historic town of Cashel is a Recorded Monument under Section 12 of the National Monuments Act, 1994. Within this area there are a number of archaeological sites and monuments that have been catalogued and described in the *Urban Archaeological Survey of County Tipperary South Riding (1993)*.

The Urban Archaeological Survey contains a report on all historic towns dating to before 1700AD. A map setting out the zone of Archaeological Potential and Archaeological Assets of Cashel Town Council Area is set out in the Cashel Town and Environs Development Plan 2009 - Map No.4. The zone of archaeological potential incorporates all of the Rock of Cashel and its cliffs and extends southwards as far as the Lepers Hospital at Windmill.

Rural Archaeology

Due to the large area of the Cashel Environs rural archaeology is an important consideration in the heritage of Cashel. Rural features are listed on the *Sites and Monuments Record (SMR) for South Tipperary*.

There is evidence of human activity in the Cashel area in the Bronze Age¹⁸. Upstanding features include Henge monuments, Ring Barrows, Fulachta Fias and standing stones. Some evidence of Iron Age settlement also exists.

The abundance of archaeological monuments dating to the Early Christian Period points to the importance of the Rock at this time. Cashels hinterland is dotted with ringforts. These were the homesteads of farmers who lived from 400 AD to c. 800AD. The occurrence of so many ringforts in the area indicates a large population here during the Early Christian Period and probably an accompanying diversity of skills and activities. The ancient road known as the Rian Bo Phadraig which links Cashel with Lismore, dates from this time and is located along the path of the modern day old Cork Road.

At the beginning of the Medieval Period, in the early 12th century Cashel became an archbishopric¹⁹ and Cormacs Chapel, a round tower and a cathedral, were built on the Rock. At the same time came the walling of the town and the construction of a number of medieval ecclesiastical foundations in the town and nearby. These included the Cisterscian Hore

¹⁸ Excerpts from Route Option Analysis Cashel By-Pass, RPS Cairns, December 1997.

¹⁹ Centre of dioceses

Abbey, the Dominican Abbey and the Franciscan Friary, all of which occur just outside the City Walls.

In the 14th and 15th century a number of tower houses were constructed. The tower house at Gortmakellis stands to five storeys high while both the tower house and parts of the bawn wall still survive at Shanballyduff. Other sites dating to the medieval period include a leper hospital at Windmill and a complex of sites at Rathcoun consisting of the remains of a Castle, two churches, a holy well and enclosure²⁰.

The Plan Boundary incorporates rural landscapes to the north, east and west of the town, therefore, rural archaeology has been considered in this SEA, and a full Sites and Monuments record has been included in the Development Plan, Map 4.

Consequence of absence of Development Plan

Both the urban and rural archaeology of Cashel and its Environs is afforded protection under current government policy issued by the Department of Environment, Heritage and Local Government.

However, in the absence of the framework for protection of archaeology as set out in the Cashel and Environs Development Plan 2009-2015 and considering existing development pressures existing archaeological remains become lost or damaged.

The lack of a policy requirement for development to occur on zoned land and on a phased and sequential basis would result in pressure to develop greenfield lands in a haphazard fashion. This could result in the loss and damage of both surface and subsurface archaeological remains.

3.1.3 Natural Heritage

Freshwater

The closest surface water body to Cashel is located to the west of the town. This is a minor stream known as the Black Stream, which is a tributary of the River Suir. Discharge from the Cashel municipal wastewater treatment plant (WWTP) is piped directly to the River Suir circa 2.5km west of the existing WWTP. However, water quality of the Black Stream and subsequently the River Suir may be affected by discharge of storm water from the town.

The River Suir itself flows in a north to south direction approximately 2.5 to 3km west of the Town of Cashel. The Town of Cashel is located upstream (c.3km) of the Lower River Suir candidate Special Area of Conservation (SAC), site code no. 002137. Biological quality rating²¹ for the River Suir at Golden (downstream of Cashel) has fallen from 4 during the 1990's to 3-4 during the first decade of this century (EPA Monitoring data).

²⁰ Excerpts from Route Option Analysis Cashel By-Pass, RPS Cairns, December 1997

²¹ Means a rating of water quality for any part of a river – From S.I. No. 258/1998: Local Government (Water Pollution) Act, 1977 (water Quality Standards for Phosphorus) Regulations, 1998.

Biodiversity, Flora and Fauna.

Cashels habitats are predominantly land based, as no surface water features are located within the study area other than some drainage ditches in the farmland area of the environs.

Due to the limestone-based geology of the area and the existence of features such as swallow holes there is potential for springs and other karstic features in the study area.

Details of Cashel and its Environs natural heritage in terms of biodiversity, flora and fauna is listed in Table 3.1. Cashels habitat types are taken from 'A Guide to Habitats in Ireland', by J. Fossitt, for The Heritage Council, 2000.

Table 3.1 Cashel Habitats	
Habitat Type	Location within Study Area
Earth banks BL2	Farmland in Environs
Arable crops BC1	Farmland in Environs
Stone walls and other stonework BL1	Farmland in Environs
Tilled land BC3	Farmland in Environs
Drainage ditches FW4	Farmland in Environs
Flower beds and borders BC4	Urban area and roads
Exposed calcareous rock ER2	Rock cliffs
Buildings and artificial surfaces BL3	Urban area and roads
Mixed broadleaved/conifer woodland WD2	Urban forestry plantations.
Calcareous springs FP1	Throughout study area.
Located outside of study area	
Depositing/lowland rivers FW2	River Suir and Black Stream

A number of different habitat types can be defined each with its own distinctive nature. The study area clearly contains a very broad range of habitat type and it can be assumed that the assorted range of habitats is home a diverse range of species.

Natura 2000 Sites -Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)

The EU Birds Directive (79/409/EEC) came into force in 1979 and it requires each member state to designate "Special Protection Areas" for birds. The Directive contains annexes, which are lists of birds which require particular conservation measures (Annex I), and also species which may be hunted, and species which may be sold. Annex I species include Whooper Swan, Greenland White-fronted Goose, Peregrine Falcon, Corncrake and Terns. Member states are also required to protect sites, which are important for migratory species such as ducks, geese and waders. There are no SPAs for birds within the Cashel and Environs Development Plan 2009-2015.

SACs are prime wildlife conservation areas in the country considered to be important on a European as well as Irish level. Most SACs are in the countryside although a few sites reach into town or city landscapes. The legal basis on which SACs are selected and designated is the EU Habitats Directive (92/43/EEC) transposed into Irish law in the European Union (Natural Habitats) Regulations, 1997. These Regulations have since been amended twice with SI 233/1998 & SI 378/2005. The Directive lists (Annex I) certain habitats that must be protected within SACs. The Development Plan is not located within a SAC, the nearest SAC is the Lower River Suir candidate SAC, located approximately 3km west of the Plan Boundary. The only potential impact on this cSAC can be attributed to surface and foul water discharge to the River Suir.

In accordance with Article 6 of the Habitats Directive Appropriate Assessment Screening was carried out during the preparation of the Development Plan. A separate Appropriate Assessment process was undertaken and a screening report prepared. Based on the findings of the screening report and based on the responses received from the environmental consultees, it was determined that there would be no significant adverse effect on any Natura 2000 site as a result of the implementation of the Development Plan. A finding of no significant effects report was prepared and was made available for public viewing.

Hedgerows

The rural environs contain an extensive hedgerow pattern especially to the north of the Rock. These may be defined as 'tall, vigorous hedges of hawthorn, ash, blackthorn and elder'²². Abundant trees of ash and elms as well as much planted beech, sycamore oak and horse chestnut' are also found in the rural environs.

The urban area of the town has expanded outwards to include agricultural lands and associated habitats. In addition the construction of the N8 Cashel By-Pass has permanently altered the nature of the environs landscape.

A serious side affect of development especially of a scale to allow urban expansion, is the removal of hedgerows and hence the removal of valuable wildlife habitats. Townsland boundary hedges and species rich hedges are particularly at risk. The National Biodiversity Plan states, "for the future, the overall goal should be no net loss of the hedgerow resource".

Trees

Cashel and its Environs has an abundant supply of trees. The town itself boasts many fine specimens of mature deciduous trees especially in the grounds of religious structures, in the grounds of Cashel Palace Hotel and on the lands located between the Main Street and the Rock of Cashel.

Trees are listed for protection in the Cashel and Environs Development Plan 2009-2015, Appendix 6.

Geology, Soils and Mineral assets

The topographical characteristics of the South East Region and South Tipperary are intricately linked with the underlying bedrock geology. In general, less weather resistant sedimentary rocks occupy the lowland areas, while more resistant igneous and metamorphic rocks occupy the upland areas.

²² Composition of field boundaries O'Sullivan and Moore, 1979, Atlas of Ireland, p47.

The major soil types around Cashel Environs are minimal grey brown podzolics with associated gleys, brown earths and basin peats. These soils are common in climates where precipitation reaches more than about 900mm for a large part of the year and where summers are relatively cool. The result is that leaching of the soil profile occurs in which mobile chemicals are washed out of the topsoil and accumulate lower down.

Groundwater

Approximately 60% of Tipperary is classified as having either extremely or highly vulnerable aquifers or groundwater. The northern part of the county is overlain by a thin cover of permeable sand and gravel and till-with-gravel. In the southern part of the county there is a cover of less permeable limestone and sandstone till which provides some protection for the regionally and locally important aquifers beneath it²³.

The aquifers in the Cashel area are classified as both poorly productive and of regional importance. Generally the environs contain aquifers classified as regionally important due to the location of Ballyadams formation. The central area is generally classified as of poor aquifer productivity due to a seam of Killeshin Siltstone formation in this area.

Considering the different geology in the central area and the general environs area, aquifers are classified as extremely vulnerable in the environs area and highly vulnerable in the central area.

Due to the non-specific nature of the groundwater survey data, aquifers are classified as extremely vulnerable and of regional importance in the Plan Boundary.

The vulnerable nature of the groundwater is indicated by the existence of features associated with limestone geology, e.g. swallow hole at Coopers Lot. In the absence of surface water bodies, there is a natural dependence on surface water discharge to groundwater in the east and south east of Cashel.

Consequence of absence of Development Plan

The Cashel and Environs Development Plan 2009-2015 contains policies to protect the natural heritage assets of the town and environs. In the absence of a Development Plan these protective policies would be removed. In view of the significant developments that have occurred in recent years there is a risk that excessive demands on existing infrastructure such as the municipal wastewater treatment plant and surface water drainage systems may impact negatively on the natural ecosystems on the area.

The protection of the environmental resources in Cashel and especially surface water, groundwater and soils depends on the preparation of and implementation of an integrated urban infrastructure strategy.

In the absence of a Development Plan and associated policies to require compliance with such an integrated strategy, development would occur in the absence of a framework for infrastructure and this would be likely to impact negatively on the resources of the area.

²³ Ground water protection scheme for South Tipperary, GSI, 1998.

3.1.4 Human Health and Population

Population

The population of Cashel and its Environs area was calculated at 2936²⁴ persons, this represents an increase of 6.0% since 2002.

Two potential future population projections for Cashel have been considered;

1. Cashel will retain its existing 3.5% share of South Tipperary's Population
2. Cashel's population will continue to grow at current growth rate of 6.0%

Cashel is a Secondary Service Centre and currently has a 3.5% share of the population of South Tipperary and it is projected that Cashel will retain this population share to 2020. This rate of growth would give Cashel a population of 3602 by 2020. However, Cashel is currently growing at a rate of 6.0%, if this growth rate continues Cashel will have a total population of 3653 by 2020. Therefore, it can be seen that if Cashel continues to grow at its current rate, it will retain its 3.5% population share of the county.

Population composition

The percentage of the population in the 0-14 age cohort is lower for Cashel (17.1%) than for the County (21.1%). However, it is considered that a 17.1% share in this cohort is indicative of strong future growth.

The percentage share of the population in the 15-24 age cohort for Cashel is slightly higher at 14.6% against the county share of 13.7%.

The percentage share of the population in the 25-44 age cohort for Cashel is slightly higher than the county share for this age cohort, however, Cashel is experiencing a much higher percentage increase in the 25-44 age cohort at 13.3% against the county average of 7.6%. This indicates a potential healthy future population increase, as this age cohort is most likely to start families, and is also indicative of a need to provide for economic prosperity, appropriate housing and employment to cater for this sector of the population and their offspring into the future.

It is noticeable that Cashel has a higher population share in the 65+ age cohort. Cashel has 16.7% share in this age cohort against the county average of 12.8%. This is indicative of a need to provide accommodation and facilities for the elderly in Cashel into the future.

²⁴ CSO 2006

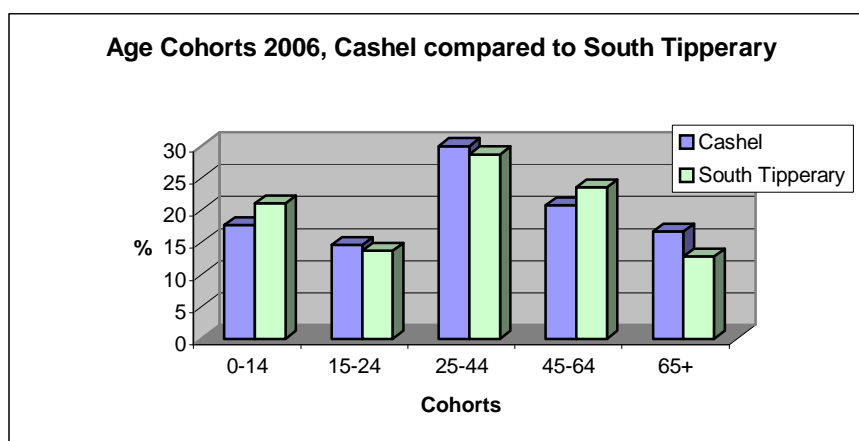


Figure 3.2 % Age Cohorts for South Tipperary and Cashel

Table 3.2 % Change in age cohorts for Cashel and Environs over 2002-2006 intercensal period.					
Year	Age Cohort	South Tipperary		Cashel and Environs	
		Actual	%	Actual	%
Change 2002-2006	0-14	137	0.8	3	0.6
	15-24	-374	-3.2	-6	-1.4
	25-44	1699	7.6	104	13.3
	45-64	1974	11.1	39	6.8
	65+	664	6.6	26	5.6
	Total Change	4100	5.2	166	6

In-Migration

The percentage of foreign nationals residing in Cashel has increased from 1.6% to 5.11% of overall population between 2002 and 2006. Therefore the population increase in Cashel can be attributed to both natural growth and increased immigration. The population growth of 6.0% between 2002 and 2006 is viewed positively and is indicative of likely sustained population growth in the future.

Table 3.3 Persons in South Tipperary's main settlements originally from outside the State						
Location	2002			2006		
	Foreign Nationals	Total	% of Total	Foreign Nationals	Total	% of Total
Cashel	32	2,770	1.16	150	2,936	5.11
Clonmel	228	16,132	1.41	461	16,274	2.83
Carrick	90	5,542	1.62	148	5,856	2.53
Tipperary	60	4,964	1.21	168	5,065	3.32
Cahir	71	2,794	2.54	243	3,381	7.19

Human Health

Our Lady's Hospital is the local hospital for Cashel, and is operated by the South Eastern Health Board. However, the hospital service has been downgraded and now is only open from 9am to 5pm daily for minor injuries only; as a result people in Cashel have to attend Clonmel, Waterford or Limerick regional Hospitals. This will increase travel times for the

population however, could also improve the overall medical service available. St Patrick Hospital is Cashel's hospital for the elderly this is a large premises and has associated sheltered housing for the elderly. The nearest psychiatric hospital to Cashel is St Lukes Hospital in Clonmel and the nearest welfare home is Cluain Arainn Welfare Home in Tipperary Town.

Housing

According to CSO 2006²⁵, Cashel has 21% detached housing and 66% terraced and semi-detached houses and Clonmel town has a total of 24% detached housing and a similar 66% semi-detached and terraced housing. Circa 445 new houses have been constructed since 2003, however, there has been a noticeable recent trend towards the provision of semi-detached two-storey units and apartment units, with only circa 5% of all housing completed since 2003 being of a single story or detached design. The lack of housing mix and especially detached housing in recent developments indicates a poor capacity to cater for the diverse housing needs of the community, especially families, and there is a need to focus on improved housing mix

Health and Safety

The European Communities (Control of Major Accident Hazards Involving Dangerous Substances) Regulations gives effect to Council Directives 96/82/EC and 2003/105/EC, hence implementing the Seveso II Directive on the control of major hazards involving dangerous substances.

A 'major accident' is defined in the Regulations as an occurrence such as a major emission, fire or explosion resulting from uncontrolled developments in the course of the operation of any establishment, leading to a serious danger either to human health or to the environment, whether immediate or delayed, inside or outside the establishment, and involving one or more dangerous substances. Under these regulations, the Health and Safety Authority must give advise to the Planning Authority when requested in relation to the siting of new establishments, modifications to an existing establishment to which the Directive applies or proposed development in the vicinity of an existing establishment.

There is no Seveso site in Cashel and its Environs. The issue of ensuring that large pharmaceutical sites do not result in a health hazard to the local population is addressed in the Cashel and Environs Development Plan 2009-2015.

Education and Childcare

Existing schools cater for a total of 1433 pupils and are located within the urban area. Details of these facilities are set out below, in Table 3.4.

²⁵ CSO Published data for private households in each town.

Table 3.4 Schools in Cashel			
	Name of School	Nature	Pupils
1.	Cashel Community School	Secondary	791
2.	St John the Baptist girls school	Primary	230
3.	St John the Baptist boys school	Primary	209
4.	The Deanery School	Primary	33
5.	Cormaic Special School	Primary and Secondary	170

The Health Service Executive (HSE) compiles a directory of pre-school services in the County. Existing childcare/crèche facilities located in Cashel Town and Environs include;

Table 3.5 Childcare facilities	
Spafield Family Resource Centre, Spafield Crescent,	Community Full Day Care Sessional Service
Cashel Montessori Pre-School St. Patrick's Rock	Private Sessional Service
St. Ailbe's Playgroup, Hillview, Old Road	Private Sessional Service
Happy Dayz, Rock View, Deerpark Road	Private Sessional Day Care & Full Day Care

Noise

The requirements of S.I. No. 140 of 2006 Environmental Noise Regulations is provided for in the Cashel and Environs Development Plan 2009-2015.

Noise can give rise to complaints from the public and is often associated with traffic and industrial uses. Generally, potential for noise impacts can be minimized by ensuring that non-complimentary uses such as industrial developments or main routes are not located in close proximity to sensitive uses such as residential development.

The construction of the N8 Cashel By-Pass has offered a benefit to the town and its residents by the reduction in noise and vibration generated by heavy good vehicles moving through the central area.

Air

Air quality data is not available for Cashel however, an assessment of air quality was carried out in Clonmel, Co. Tipperary from 10th June 2004 until 13th January 2005 by the EPA.

Concentrations of carbon monoxide, sulphur dioxide, nitrogen dioxide, benzene and lead were below their respective lower assessment thresholds. Levels of Particulate Matter

(PM10) exceeded the upper assessment threshold for this parameter²⁶. These results were classified as 'good air quality' by the EPA however, as Clonmel is classified as a Zone C area quality zone i.e. – one of 15 specified urban areas with populations greater than 15,000 further monitoring was recommended.

Cashel Town and Environs is classified as Zone D: Rural Ireland, i.e. the remainder of the State excluding Zones A, B and C. No specific monitoring data is available from the EPA for the Cashel area and it was not considered necessary to undertake air quality monitoring in the area due to the classification of the Clonmel area as 'good' and due to the non-existence of significant air polluting agencies in the area.

Ozone concentrations were measured²⁷ in Clonmel from August to November 2004. During this period;

- The population information and alert thresholds were not exceeded
- The target value for the protection of human health was not exceeded
- The long term objective for the protection of human health was not exceeded

Climate

Met Eireann provides climatic data for Kilkenny, which is the nearest weather station to Cashel. The dominant influence on Ireland's climate is the Atlantic Ocean. Consequently, Ireland does not suffer from the extremes of temperature experienced by many other countries at similar latitude. Average annual temperature is about 9 °C. In the middle and east of the country temperatures tend to be somewhat more extreme than in other parts of the country.

Mean annual windspeed varies between about 4 metres per second in the east midlands and 7 m/sec in the northwest. Strong winds tend to be more frequent in winter than in summer. Sunshine duration is highest in the southeast of the country. Average rainfall varies between about 800 and 2,800mm.

The implementation of the Cashel and Environs Development Plan 2009-2015 is unlikely to give rise to alterations in local or regional climate, however, the implementation of the Development Plan must adhere to the principles of sustainable development to ensure that Ireland can meet its obligations under the Kyoto Agreement.

Travel Patterns

Cashel Town is defined as a Secondary Service Centre in the Settlement Strategy for South Tipperary and thus, will offer employment and services for the town's population and also for its rural hinterland.

The improvement of the N8 National Route may encourage increased commuting by persons who decide to commute to work to and from Cashel.

Local travel patterns are also an environmental concern therefore, and an assessment of CSO 2006²⁸ commuting patterns indicate that 42% of the population in Cashel travel between 0-

²⁶ EPA Air Quality Data, 2005

²⁷ National Ozone-Monitoring Network

²⁸ CSP SAPS for Cashel urban and rural EDs

4km to work, 13.5% travel between 5-15km to work (indicating that they may work in Clonmel) and that 18.8% travel 15km or greater to work (25.7% not stated).

Amenities

Sports and recreation is an important element of the long-term health of any town. Cashel town is well serviced by field sports, with GAA facilities, rugby facilities and soccer facilities available. However, it is notable that other than field sports there is little alternative choice for sports and recreation. Notwithstanding this and considering the scenic setting of Cashel and the wealth of features of interest, there is potential to improve walking and exercise by the provision of facilities such as a signposted Sli na Slainte route.

Consequence of absence of Development Plan

The Cashel and Environs Development Plan 2009-2015 will act as a framework to ensure that the community of Cashel can grow in a sustainable manner and ensures that when the population increases that the key services and amenities required are put in place.

It has been identified that Cashel has seen significant construction of new housing, however, the housing mix provided has not addressed the needs of the population, and there is a need for suitable housing for families. In the absence of the Cashel and Environs Development Plan 2009-2015 it is unlikely that an appropriate housing mix would be provided.

In the absence of this policy framework for new development it is likely that the key amenities and facilities required in order ensuring a healthy and productive community would not be provided.

Key sites that could provide for facilities for sports and recreation and the expansion of schools etc. would not be protected and provided in a timely fashion to ensure that the expanding community can be provided for.

Such a situation would be likely to give rise to social issues and deprivation among certain sectors of the community and ultimately the profile of the town would be reduced to an extent that it would not attract tourism or new investment.

The Development Plan also sets out standards for development (Chapter 9), to ensure that new development is constructed to minimum standards to address issues such as noise, air quality, discharge of surface and foul water etc. In the absence of the Cashel and Environs Development Plan 2009-2015, it would not be possible to adequately control standards of construction and management and aftercare of developments.

3.1.5 Vistas, Townscape and Landscape

Views

Due to the prominence of the Rock of Cashel, there are many opportunities to view it from different locations within the town and environs. Each of these vistas offer unique views of the Rock from a different setting and each contribute to the character of the Rock and its location in Cashel.

It has been acknowledged in the preparation of the Cashel and Environs Development Plan 2009-2015, that the built fabric of Cashel appears to be expanding in an uneven pattern

southwards toward the M8 Cashel By-Pass and generally no new development is occurring in other directions.



Figure 3.3: View South across Deerpark from Golden Road.

Streetscapes

The streetscapes of Cashel contain the history and fabric of the town and provide a setting for the day-to-day activities of the population and visitors. They are an important element of the overall character of Cashel and measures must be taken to ensure that the existing character is identified and preserved.

Landscape

The landscape in the environs of Cashel is open and undulating and predominately used for grazing. The open agricultural lands to the North of the Rock offer a panoramic view towards the Rock and also provide an unrivalled view northwards from the Rock itself. This landscape is not natural, rather it is a manmade landscape shaped by the enclosure of lands and the agricultural practices of today. The conservation of this landscape (where appropriate) free from unsuitable development is key to the retention of the unique character and setting of the Rock of Cashel.

Consequence of absence of Development Plan

A large area of landscape to the north of the Rock (extends from the Golden Road and the Dualla Road) was zoned for special amenity use in the 2003 Cashel and Environs Development Plan. This effectively restricted almost all forms of development on this landscape and these lands remained in agricultural use over the lifetime of the 2003 Development Plan. This restricted landzoning had the potential to eventually contribute to pressure for development to the south of the town and effective sterilisation of land to the north and could contribute to an unbalanced urban form for the town.

Without a the review of landzoning carried out for the Development Plan 2009-2015 there was a threat that new further development to the south of the town could result in pressure to jump the N8 Cashel By-Pass and direct development away from the town centre, ultimately this could damage the overall urban form of Cashel and viability of the town centre.

However, it was acknowledged throughout the Plan review process that an absence of any restrictions on new development on sensitive landscape to the north of the Rock there would be a real risk that inappropriately sited and designed development could occur in a manner that would be visually destructive on the setting of the Rock of Cashel. Therefore, the protection of the sitting of The Rock was a key consideration in the review of landzoning carried out for the Development Plan 2009-2015.

3.1.6 Infrastructure**Transport**

National road development has occurred at an unprecedented scale and pace in recent years and is set to continue for the foreseeable future. Transport 21 is the governments €34.4 billion blueprint for the development of Ireland's land, sea and air transport over the next decade.

Such road building projects facilitate increased travel by private car and have implications for air quality and Ireland's obligations in terms of meeting agreements under the Kyoto Protocol. Landscape and quality of life for local residents in terms of noise disturbance in the vicinity of major roads will also be impacted upon.

The National Roads Authority (NRA) recommends that all development objectives and especially zoning objectives should guide developers to design for sustainable transportation requirements at the earliest stages of development design.

M8 Cashel By-Pass

Cashel lies on the National Primary Road M8 (Dublin to Cork) and the town was by-passed in 2004. The M8 Cashel By-Pass comprises 6.7km of dual carriageway and forms the eastern boundary of the Cashel Environs Development Plan 2009-2015.

As a result of the M8 Cashel By-Pass traffic levels in the town centre have decreased significantly (6,000 vehicles per day removed). This is a highly positive effect of the N8 Cashel By-Pass, however, the new route itself has irreversibly altered the character of the rural landscape to the east of Cashel.

The M8 Cashel By-Pass is part of a NRA programme of investment and is designed to cater for road traffic needs over a twenty year horizon based primarily on anticipated traffic volumes related to the inter-urban and inter-regional transport function of national roads. It is

set out in the NRA Policy on Development Control and Access to National Roads, 2006, that the traffic carrying capacity of national routes will be determined by a range of factors in addition to traffic growth, in particular;

- The frequency of access points to the network;
- The extent of development adjoining national roads, including interchanges, and in the environs of such roads, as well as
- The traffic volumes generated by such development²⁹.

Primary to the protection of the carrying capacity of the M8 Cashel By-Pass will be the identification of a new local road network for the town. This would take pressure away from existing congested junctions close to the town centre and protect the M8 By-Pass.

Intersections on the M8 Cashel By-Pass

Cashel is almost unique in that it now has three national route interchanges as a result of the construction of the M8 Cashel By-Pass. Each of these interchanges has attracted interest in new development on lands adjacent to the interchanges.

Haphazard development adjacent to interchanges has the potential of reducing the carrying capacity of the M8 Cashel By-Pass, expanding the urban boundary of the town in an unsustainable/unserviceable manner and reducing the visual character of the town.

It is set out in the NRA document on Development Control and Access to National Roads, that Development Plan policies should be adopted so as to avoid the undermining of the strategic transport function of national roads, including interchanges, by measures intended to cater for the needs of local traffic which should more appropriately be addressed within the framework of providing adequate local road infrastructure. The NRA recommends that planning applications for significant development proposals should be accompanied with a Transport and Traffic Assessment and Road Safety Audit.

All lands located outside of Cashels interchanges are located in the administrative area of South Tipperary County Council. The issue of Strategic Employment at major transport interchanges is addressed in the South Tipperary County Development Plan 2009-2015 (refer to policy ECON 3 – Strategic Employment).

Local Roads

Cashel has an extensive local road network, which comprises regional roads and local roads. These roads generally converge on the town centre and this has led to pressure on certain junctions close to the centre of town especially at key times such as school drop-off and collection times. These roads have limited capacity to cater for additional traffic and Dualla Road, Old Cork Road and Windmill Road have especially affected.

Local Distributor Roads

The NRA makes a clear differentiation between the purpose of local distributor roads and national routes, and sets out that local routes should be developed to ensure that they operate to facilitate local traffic and thereby ensure that the traffic carrying capacity of the national routes are preserved.

²⁹ NRA Policy on Development Control and Access to National Roads.

Wastewater

Cashel town is serviced by a Design Build and Operate (DBO) wastewater treatment plant (WWTP) located adjacent to the Golden Road and treated effluent is discharged to the River Suir to the west. The WWTP has a design capacity of 9000 population equivalent (p.e.) It is estimated that the current demand on the WWTP is in the region of 6468 p.e and that current loading and approved planning loading equates to a total potential loading of 9172 p.e. It is the long-term plan of the Council to carry out works to the existing municipal plant to increase its capacity by 3000 p.e, thereby providing for a total capacity of 12,000 p.e.

The existing foul sewer mains that goes through Cashel Town centre has limited capacity to accommodate additional loading from new development in the Environs and this causes a problem for transporting foul water from the Environs to the plant on the Golden Road.

In June 2007, White, Young and Green consultants were commissioned to prepare a report for the Council, entitled 'The Dualla Rd Cashel Serviced Land Initiate Scheme'. This report identified existing deficits in the water, foul and storm water infrastructure.

In order to service undeveloped lands it is proposed to construct a new foul water pipe system to extend from the east of the town through lands to the south of the town to connect with the existing WWTP on the Golden Road.

The provision of new infrastructure on this scale is paramount to the future development of Cashel and must occur under the guidance of a framework for such works. The proposed SLI is currently under review by the Water Services Section of South Tipperary County Council.

Potable Water

The public water supply for Cashel is from the Galtee Regional Water Supply augmented by a groundwater source at Springmount. However, in view of increasing pressures on supply, it is proposed to boost the existing water supply through the provision of two boreholes at Thomastown and Fernamanagh in the short-term. A long-term solution under active consideration is a new potable water source from the River Aherlow and the enlargement of the capacity of the Palmers Hill Reservoir where lands have been zoned for this purpose.

Surface Water

Surface water from Cashel Town is managed by a combination of methods including, attenuated discharge to the Black Stream, located to the west of Cashel town, on-site soakaways, and occasional storm water overflow to an existing swallow hole located close to the GAA facilities at Coopers Lot.

The topography of Cashel restricts the potential for surface water to be discharged via a gravity flow network from lands to the northeast, east and south of the town. The Council therefore requires that surface water be disposed of in these areas on site where possible. However, new development should not rely on discharge to sensitive karstic features such as swallow holes and new development should demonstrate that it will not contribute to flooding either on site or on lands elsewhere in the Plan area.

Footpaths and cycle paths

Dedicated cycle facilities are absent from Cashel and footpath provision is poorly provided for in places, e.g. Dualla Road, Old Road, Deerpark Road, Windmill etc.

The provision of high quality footpaths and cycle paths and identification of linkages, are required to facilitate and encourage sustainable movements throughout Cashel and Environs. In order to promote cycling and walking as a viable option to the car, policies and objectives are incorporated into the Development Plan to ensure the provision of footpaths and cycle paths and high quality linkages as part of new residential and commercial development.

Car parking

Cashel is heavily dependant on its hinterland and the car is the primary means of access to and from the town. There are currently 608 parking spaces in the town centre (pay and display) and 216 of these are off street. Further off-street free parking is available at Upper Friar Street.

Short-term car parking in Cashel is controlled by a pay and display system and is considered adequate, however, there may be a shortfall in long-stay car-parking availability to cater for those working in the town.

Waste management

Cashel Recycling Centre and Waste Transfer Station at Waller's Lot, Cashel was opened on 18th September 2006. This facility accepts a wide range of household goods. Goods are accepted for free as follows;

- ✓ Glass Bottles and Jars,
- ✓ Aluminium (Drink) Cans,
- ✓ Steel (Food) Cans,
- ✓ Textiles (clothes not included),
- ✓ Fluorescent Tubes,
- ✓ WEEE (Waste Electrical & Electronic Equipment)

A charge applies to the following materials;

- ✓ Black bags of refuse - €6 per bag
- ✓ Bulky Waste (Mattresses, furniture, carpets etc) - €10 per large item.

A charge also applies to the following;

- ✓ Garden Waste,
- ✓ Timber,
- ✓ Metal,
- ✓ DIY Waste,
- ✓ Plastic Bottles,
- ✓ Newspapers & Magazines,
- ✓ Cardboard Paint,
- ✓ Old Medicines,
- ✓ Pesticides,
- ✓ Aerosols,
- ✓ Batteries,
- ✓ Waste Engine & Cooking Oil

Bottles and cans are also collected at two bring banks within the town centre at the Green and Friar Street car park.

The Council received funding in July 2007 for a Waste Prevention project. Cashel was selected as the project town, and a waste prevention team has been formed within the

Environment Section. In autumn 2007 most of the businesses on Main Street were approached by the team, to gauge the level of interest in participation. Four business have agreed to be involved in project to date (March 2008).

Waste is collected in Cashel and its Environs by both the County Council and private operators. Approximately 771 customers have their waste collected by South Tipperary County Council.

A private sludge disposal operator removes sludge from the wastewater treatment system at Golden Road and this sludge is subsequently land spread outside of the Development Plan area.

Consequence of absence of Development Plan

The consequence of the absence of a framework for the future development and planning of infrastructure would be likely to be serious and far-reaching.

The impact on the carrying capacity of the new N8 Cashel By-Pass would be undermined without strong policies to restrict new uncontrolled access points onto the route and to control the nature of development in the vicinity of the route. The potential of Cashel to develop would be restrained in the absence of a strategy for a new local road network and the pressures on existing junctions in the town centre would be further increased in the absence of a strategy to redirect traffic away from such junctions.

New development must be planned in a framework to ensure that the necessary infrastructure is put in place in a sequential and timely manner. In the absence of the Cashel and Environs Development Plan 2009-2015 such planning measures would be lost and development would occur in a non-sequential and non-planned manner and without the necessary infrastructure in place to accommodate it.

New waste management and public facilities infrastructure are generally not adequately implemented by private developers in the absence of clear guidance and therefore, it is important that provision for such facilities is set out in policy.

The environmental consequences of the absence of the Cashel and Environs Development Plan 2009-2015 would be significant and could include for surface and ground water contamination, pressure to develop green field sites instead of redevelopment of brown field or derelict sites etc.

Finally, the lack of the Cashel and Environs Development Plan 2009-2015 would result in the inability to collect development contributions, which are required to ensure the maintenance and upgrading of public utilities.

3.2 Primary Environmental Issues and Problems

The scoping process identified the key environmental issues for Cashel. Furthermore, the analysis of the existing environmental baseline parameters has allowed for the identification of significant issues. Existing problems associated with these issues have been identified and potential significant effects of the implementation of the Development Plan have been predicted. Four environmental areas have been identified as being of high relevance, each of these is addressed below.

3.2.1 Archaeological Heritage

The entire area of the historic town of Cashel is a Recorded Monument under Section 12 of the National Monuments Act, 1994. Within this area there are a number of archaeological sites and monuments that have been catalogued and described in the *Urban Archaeological Survey of County Tipperary South Riding (1993)*. Loss of these features has occurred in the past due to lack of referral to the DEHLG and through inadequate monitoring and recording of on-site remains.

The City Walls of Cashel are a very significant feature of the archaeological heritage of the town, however, degradation and obstruction of the City Walls has occurred. The rural archaeology of Cashel is also significant in view of the extended development boundary of the Cashel and Environs Development Plan 2009-2015.

Likely Significant Environmental effects of the Cashel and Environs Development Plan 2009-2015

1. In general, new development will be directed to the urban area of Cashel with a view to consolidating the urban core. Notably, this area contains most archaeological remains.
2. New development may have a *negative* impact on archaeology, due to physical damage or loss of features.
3. Implementation of the Cashel and Environs Development Plan 2009-2015 may result in a *positive* impact on archaeology due to implementation of policies/guidelines to offer greater protection to archaeological features. The insertion of the Sites and Monuments Record for the entire Plan area will enhance the level of protection afforded to archaeological heritage.
4. It is likely that public accessibility will be improved due to greater focus on Cashel's public realm. This would be a positive impact in raising awareness of archaeology.

3.2.2 Architectural Heritage

Cashel Town has a distinct character and has significant architectural heritage and thus, is listed as a Heritage Town.

St Patrick's Rock dominates the northern side of Cashel and the majority of the principle approaches to the Town. The international significance of the Rock has resulted in a proposal to review the existing position of the Rock of Cashel on the tentative list for selection as a UNESCO World Heritage Site.

A total of 105 structures have been identified in the Record of Protected Structures (RPS) for the Cashel and Environs Development Plan 2009-2015 (Appendix 3), the RPS includes 82 structures that are listed on the National Inventory of Architectural Heritage (NIAH), published for South Tipperary in December 2007. An ACA and ACA statement have been included in the Cashel and Environs Development Plan 2009-2015 (Section 4.1.2 ACA and Appendix 4 ACA Design Statement).

The City Walls of Cashel enclose an area of 14 hectares, however, the walls have long since fallen into disrepair and large section of the wall has been knocked. Cashel Town Council in association with the Heritage Council has commissioned a City Wall Conservation Plan (2008) and associated Management Plan to identify measures to protect and manage the remaining City Walls.

Likely Significant Environmental effects of the Cashel and Environs Development Plan 2009-2015

1. In general, new development will be directed to the urban area of Cashel with a view to consolidating the urban core. Notably, this area contains most elements of architectural significance.
2. New development may have a *negative* impact on architecture, due to physical damage/loss to architectural features/buildings.
3. Implementation of the Development Plan may result in a *positive* impact on architectural heritage due to implementation of policies/guidelines to offer greater protection to architecture, such as;
 - Additions to Record of Protected Structures (30)
 - Review of ACA statement
 - Review of NIAH recommendations
 - Greater accessibility to existing architectural features through the implementation of the Public Realm Plan and use of Master Plan Designations.
 - Insertion of new Section 4.5 Cashel Visual Assessment.
4. Review of policy and approach to management of derelict site/derelict structures and discussed structures could confer a positive impact on the setting and use of architectural structures.
5. Potential for an adverse impact on the setting of the Rock of Cashel, especially on lands zoned for development as part of Master Plans, can be mitigated by use of measures such as Visual Impact Assessment.

3.2.3 Views/visual setting/landscape

The architectural heritage of Cashel requires careful management and consideration of its urban and rural setting and views. The Rock of Cashel is dramatically set in an unspoilt countryside when viewed from the north and set in an interesting urban fabric when viewed from the south.

These contrasts in the setting of the Rock contribute to its character. However, the sterilisation of all undeveloped land to the north of the Rock will ultimately result in an unbalanced urban form to Cashel with excessive development to the south and no development to the north. Therefore, the Cashel and Environs Development Plan 2009-2015 sets out in its vision statement that a more balanced urban form to Cashel will be facilitated.

Likely Significant Environmental effects of the Cashel and Environs Development Plan 2009-2015

1. New development may have a *negative* impact on the visual setting of the town and surrounding landscape by virtue of incongruous development.
2. Implementation of the Development Plan may result in a *positive* impact due to greater design management and controls on development in certain areas. The revision of zoning designations has allowed for greater focus on the primary landscape to be protected free from development.
3. The integration of the Cashel Visual Sensitivity Analysis and new policy for Cashel Visual Assessment (Section 4.5) will have a positive impact on the setting of Cashels architectural heritage.

3.2.4 Water Quality

Cashel is located circa 3km upstream of the Lower River Suir candidate Special Area of Conservation (SAC). Treated municipal effluent is discharged directly to the river Suir and storm water overflow is discharged to a tributary of the Suir known as the Black Stream.

Biological quality rating of the River Suir at Golden has fallen from 4 (1990s) to 3 – 4 since 2000³⁰. It has been identified that the poor biological rating of the Suir at Golden may be attributed to poor control of storm water overflow from Cashel to the Black Stream.

Cashel town is located in an area identified by the GSI as having vulnerable groundwater resources. Due to the non-specific nature of the groundwater survey data, it may be assumed that in general aquifer classification for the Cashel area may be classified as extremely vulnerable and of regional importance.

Likely Significant Environmental effects of the Cashel and Environs Development Plan 2009-2015

1. New development may have a *negative* impact on surface and groundwater quality by virtue of increased development with a lack of corresponding improvement in existing surface water and wastewater infrastructure.
2. Implementation of the Development Plan may result in a *positive* impact by virtue of improvement in existing surface water and wastewater infrastructure as part of new development. A Serviced Land Initiative (SLI) Study for Cashel has been commissioned to review how infrastructure can be provided in a sustainable and long-term manner. New development will be required to conform to the requirements of this strategy.

3.3 Strategic Environmental Objectives (SEOs)

Strategic Environmental Objectives (SEOs) have been compiled based on the scope of the key environmental issues for Cashel.

The use of SEOs fulfils obligations set out in Section F, Schedule 2B of the Planning and Development (Strategic Environmental Assessment) Regulations 2004. The SEOs are distinct from the Cashel and Environs Development Plan 2009-2015 strategic development objectives and provide a standard against which the goals, policies and objectives of the Development Plan can be measured in order to highlight those with the potential for environmental impact.

The SEOs are used as a tool to cross check the policies of the Cashel and Environs Development plan 2009-2015 in order to maximise the environmental sustainability of the Development Plan. The cross checking process will help identify policies that will be likely to result in significant adverse impacts, so that alternatives may be considered or mitigation measures may be put in place.

³⁰ EPA Surface Water Monitoring Data

Strategic Environmental Objectives

1. **Cultural Heritage**
 - Protect and manage the integrity and setting of architectural and archeological heritage resources and identify other features of historic merit for protection where appropriate.
2. **Landscape/Views and visual setting**
 - Promote management and enhancement of townscapes and the urban environment
 - Promote management and enhancement of landscapes and the rural environment
3. **Water Resources**
 - Promote sustainable water consumption based on long-term protection of available water resources.
 - Promote sustainable urban drainage systems as part of proposals for new development.
 - Achieve and maintain water quality standards and reduce discharges of pollutants or contaminants to waters.
 - Protect and manage the quality, character and distinctiveness of geological and geomorphological systems, sites and features.
4. **Natural Heritage, Biodiversity, Flora and Fauna**
 - Protect and promote the diversity of habitats and species
5. **Population and Human Health**
 - Facilitate a high quality of life for Cashel's population through ensuring high quality residential, recreational and working environments, encouraging sustainable transport patterns, public access and minimising noise pollution.
6. **Material Assets**
 - Maximise the use of the existing built environment to reduce the need to develop greenfield lands.
 - Promote the principles of the Joint South East Waste Management Plan to minimise the amount of waste to landfill.
 - Protect and maintain the quality of and access to material assets such as aquifers, the N8 Cashel By-Pass, open spaces and public walkways and all other physical and social infrastructure.
 - Prevent flood risk as a result of new development, protect natural surface water karstic features and integrate sustainable urban drainage systems where appropriate.
7. **Local Air and Climatic Factors**
 - Reduce the need to travel by private car, and promote alternative sustainable transport modes.
 - Encourage energy efficiency in building design and maximise the use of renewable energy forms.
 - Reduce and minimise all forms of air pollution and promote tree planting where appropriate.

3.4 Limitations on the data available, gaps in detail, assumptions made

Data used in the compilation of this Environmental Report was acquired from existing sources no new research was undertaken. Data gaps and process difficulties have already been identified in this report in Chapter 2.

Data gaps may be summarised as follows;

- No specific local data available for certain environmental aspects in the Cashel area.
- The attainment of data for the Cashel Town and Environs Development Plan review required consultation with two local authorities Cashel Town Council and South Tipperary County Council.

4.0 SEA of Cashel and Environs Development Plan 2009- 2015

4.1 SEA Methodology

The following methodology was used to assess the significance of the effects of the Cashel and Environs Development Plan 2009-2015 on the environment.

Step 1:

The main Issues relating to the environmental topics or receptors (i.e. Biodiversity, Population and Human Health, Landscape etc) were examined in the Baseline Data (Chapter 3)

Step 2:

The Strategic Environmental Objectives (SEOs) were chosen based on International, National, Regional and Local level environmental issues (Chapter 3)

Step 3:

Options for Scenarios for the Development of Cashel Town and Environs, were considered and the SEOs were compared to the Strategic Development (SDOs) Objectives in order to assess significant effects of the environment (Chapter 4)

Step 4:

The policy approach of the chosen strategy for the Cashel and Environs Development Plan 2009-2015 was assessed against the SEOs to determine whether the chosen strategy was acceptable (Appendix 1 - Matrix)

Step 5:

Mitigation measures have been included in the Cashel and Environs Development Plan 2009-2015, these are ways of offsetting adverse effects on the environment (Chapter 4)

Step 6:

Monitoring measures are proposed for the achievement of the SEOs based on targets and indicators, the monitoring programme will assess the effects of implementing the Cashel and Environs Development Plan 2009-2015. (Chapter 5)

4.2 Alternative Plan Scenarios

The SEA Directive requires that the environmental report should discuss *'reasonable alternatives taking into account the objectives and the geographical scope of the Plan or Programme'*.

For the purposes of the Cashel and Environs Development Plan 2009-2015, four broad Development Plan alternatives have been identified, as follows;

1. Maintain Existing Development Policy Context

This would involve making no changes to the existing development and zoning context as set out in the Cashel and Environs Development 2003. Development would continue to occur in accordance with the objectives of the Cashel and Environs Development Plan 2003. This approach would continue to provide for new development as substantial areas of undeveloped lands remain within the existing Cashel and Environs Development 2003 area.

However, a continuation of recent development patterns could exacerbate an emerging pattern of unbalanced development to the south of the town which threatens to undermine the viability of the town centre and create pressure to develop beyond the N8 Cashel By-Pass.

Opportunities to identify strong and specific objectives (as a result of the construction and opening of the M8 Cashel By-Pass) for infrastructure would not be provided for. The new M8 Cashel By-Pass would be susceptible to the degradation of its traffic carrying capacity in the absence of specific polices to control new development adjacent to it.

In the absence of a framework for an integrated water services infrastructure plan, opportunities for the implementation of a developer led integrated water services and infrastructure strategy would be lost.

Finally, the promotion of public access and implementation of the Public Realm Plan would be unachievable with specific policy to address public realm and accessibility.

2. Promote dispersion of development into surrounding countryside and especially outside of M8 Cashel By-Pass into the rural countryside

This would involve zoning of land outside of the M8 Cashel By-Pass and actively facilitating expansion of the built form of the town in all directions including north of the Rock. This approach may readdress the imbalanced urban form of the town, however, the approach to dispersed and unconsolidated development would bring about new problems.

The vitality of the town centre would suffer, and problems such as loss of retail function and increase in number of disused and vacant units would occur due to the lack of focus of development on the town centre. In turn, this would impact negatively on the tourism industry.

Opportunities for provision of water and road infrastructure would be weakened due to the absence of a strong sequential approach to development. This would result in the development of areas without the amenities and facilities required.

The potential for impact on biodiversity may be increased due to the focus on the development of greenfield sites.

Finally, a very dispersed urban form would be unsustainable in the long term due to the problems in achieving mobility and transport through the town and increased reliance on the car.

3. Provide for *both* consolidation of built form and expansion of existing built form where appropriate.

This approach would provide for an emphasis on consolidation of development within the existing built form of Cashel, and the facilitation of new development on green field sites only

when there is a proven need to do so. Identification of development on green field sites would be based on a recognised need to provide for a more balanced growth pattern to the town, and to address the pressure on development land to the south.

This approach would be based on a sequential approach to the development of land and would facilitate the achievement of new infrastructure on an appropriately phased basis.

4. Development Plan format

The chosen alternative may be tested against a fourth alternative, which relates not to the development strategy, but to the nature and format of the Cashel and Environs Development Plan 2009-2015 itself, as follows;

- (c) Use of overarching and broad policies – Difficult to measure their achievement.
- (d) Use of specific, easily identifiable policies and objectives – Readily measurable.

In developing and testing the scenarios particular regard was given to the concept of environmental sustainability and the principles adopted by the Government in the document Sustainable Development: A Strategy for Ireland 1997.

Each of the scenarios were evaluated in a matrix (Table 4.1 below) and assessed by their performance against both the Strategic Development Objectives (SDOs) (based on the Strategic Vision for Cashel), and the key Strategic Environmental Objectives (SEOs) for Cashel.

Table 4.1 Assessment of performance of the Alternative Scenarios for the Cashel and its Environs Development Plan 2009-2015 against the SEOs and SDOs			
	1. Maintain existing plan context retain existing plan	2. Promote Dispersion of development beyond the N8 Cashel By-Pass and into the rural countryside	3. Consolidation of existing built form. Dispersion only provided for where appropriate
EPOs			
Cultural Heritage	O	X	O
Landscape/Views and visual setting	O	X	O
Water Resources	O	X	O
Natural Heritage, Biodiversity, Flora and Fauna	O	X	O
Population and Human Health	O	O	Y
Material Assets	O	X	Y
Local Air and Climatic Factors	O	X	O

SDOs			
Provision of a more balanced spatial growth pattern for Cashel and Environs and to promote a renewed focus on the town centre.	O	X	Y
Provision of planned infrastructure and services network in conjunction with a new local transport route network	O	X	Y
Management and protection of the built, cultural and natural heritage assets of Cashel and improving public accessibility to existing features	O	O	Y
Provision of new housing, amenities and facilities for the growing population of Cashel, and to promote a socially inclusive community	O	X	Y
Facilitation and promotion of a strong tourism economy, by focusing on and recognising both the strengths of Cashel and the needs of visitors	O	X	Y
Promotion and strengthening of the Town Centre as a vibrant base for residents and tourist alike	O	X	Y
Provision of core areas of enterprises, employment and industry in the town adjacent to key infrastructure and existing employment uses	X	X	Y
Facilitation of appropriate gateway development and gateway features on the approaches to the Town at strategic locations	X	X	Y

Assessment Matrix

Key	Positive	Mitigable	Not compatible
	Y	O	X

4.3 Assessment of Alternatives.

The SDOs of the long-term strategic vision for Cashel and the SEOs for Cashel were assessed against three potential development scenarios in Table 4.1 above. This process determined which scenario would be the most effective in achieving the Development Vision for Cashel in the most environmentally sustainable manner.

Each of the development scenarios principally aim to provide for the development and growth of Cashel thus each scenario has the potential to have an adverse impact on the environment.

Scenario number 2, which provides for the dispersed growth of Cashel, was found to be incompatible with four of the SEOs, having an adverse and unmitigatable impact on landscape/views, water resources, natural heritage and material assets. It was also found that scenario number 2 would be incompatible with almost all of the SDOs. Having considered the incompatibility of this development scenario with both the SEOs and the SDOs for Cashel and its Environs it was considered that scenario number 2 which aims to promote dispersion of development beyond the M8 Cashel By-Pass and into the rural countryside would be the most inappropriate development alternative.

Both scenario numbers 1 and 3 were compatible with the SEOs and would not have any adverse environmental impacts that could not be mitigated.

Scenario number 1, which aims to maintain the context of the Cashel and Environs Development Plan 2003 did not have any unmitigatable adverse impacts on the SEOs however, it also did not contain any positive impacts.

It was also found that scenario number 1 was incompatible with achieving 2 of the SDOs. These referred to provision of core employment areas and development of strong gateway features to the town. This is due to the lack of specific/clear policy to address these issues in the Cashel and Environs Development Plan 2003.

The principle aim of scenario number 3 is to consolidate the existing built form and only permit dispersion where appropriate. It was found that this scenario did not contain any adverse unmitigatable impacts on the environment and contained potential positive impacts. It was also found that scenario number 3 would have a positive impact on each of the SDOs.

It is considered that scenario number 3 which aims to provide for *both* consolidation of built form and expansion of existing built form where appropriate would be the most effective in achieving the development vision for Cashel in the most environmentally sustainable manner.

Scenario number 4 relates to the Cashel and Environs Development Plan 2009-2015 format. When scenario number 3 was assessed against scenario number 4 it was considered that the use of specific policies and objectives instead of the use of broad policies and objectives would ensure better management and measurement of development.

The preferred strategy (Scenario 3 and 4(b)) as outlined above has been incorporated into Cashel and Environs Development Plan 2009-2015.

The individual policies of the Cashel and Environs Development Plan 2009-2015, which flow from that strategy and which include the mitigation measures as detailed in Chapter 6, are evaluated for compatibility against the SEOs in the Policy Matrix as set out Appendix 1.

4.4 Significant Environmental Effects of Preferred Strategy

It has been identified that in the absence of appropriate mitigation measures, potential exists for adverse environmental effects arising from the implementation of the *preferred strategy*. This section describes the measures to prevent, reduce and as fully as possible offset any significant adverse environmental effects of the *preferred strategy*.

The *preferred strategy* was identified as having potentially conflicting interactions with the following Environmental Protection Objectives (EPOs):

- Cultural Heritage: C1
- Landscape/Views and visual setting: V1, V2.
- Water Resources: W1, W2, W3, W4.
- Natural Heritage, Biodiversity, Flora and Fauna: H1.
- Local Air and Climatic Factors: L1, L2, L3.

Mitigation measures in respect of the potential conflicts with the environment are therefore outlined below. These mitigation measures are reflected in the policies of the Cashel and Environs Development Plan 2009-2015 and have been tested in the Matrix set out in Appendix 1.

4.5 Mitigation Measures

As the SEA and the Cashel and Environs Development Plan 2009 - 2015 were prepared within a similar time frame this provided an opportunity to continually update and review the policies of the Cashel Town and Environs Development Plan 2009 - 2015 and to ensure that potential adverse impacts on the environment can be mitigated.

4.5.1 Mitigation of potential impacts on Cultural Heritage

Cultural Heritage EPO

C1	Protect and conserve the integrity and setting of architectural and archeological heritage resources and identify other features of historic merit for protection where appropriate.
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Map 1 and 2 of the Cashel and Environs Development Plan 2009-2015 sets out zoning and development objectives for Cashel and the surrounding Environs. To ensure the protection of the unique architectural and archeological, appropriate use of zoning has been applied. Notably, development is restricted on lands designated for Special Amenity (SE) to the north of the Rock and in the vicinity of the Rock to ensure that inappropriate development does not occur in this area. The area of land zoned for SE has been reduced from the area zoned in the Cashel and Environs Development Plan 2003. The area designated as SE is now smaller however; it is considered that this use of a smaller area will allow for the implementation of a tailor made policy appropriate to the area, this policy is set out in Section 4.4.1 Special Landscape. This will be more effective than the designation of a large area, which may not have the same level of sensitivity on lands further removed from the Rock.

Chapter 4 is entitled Amenity, Built and Natural Environment and Heritage. This section addresses the unique cultural and natural environment assets of Cashel. Structures listed on the DEHLG National Inventory of Architectural Heritage (NIAH) have been included in the Record of Protected Structures. This equates to a total of 30 additions. Policy ENV 1: Protected Structures sets out the Councils policy regarding the protection of these Protected Structures.

An Architectural Conservation Area (ACA) has been set out for the town centre area and incorporates that part of the town centre being of special character. Policy ENV 2: Architectural Conservation Area sets out the Council policy regarding the protection and management of the ACA and detailed guidance is set out in the ACA Design Statement in Appendix 4. The ACA for the Cashel and Environs Development Plan 2009-2015 has been reduced in area to ensure that it covers only those sections of the town centre that contains the attributes appropriate and specific to an ACA.

The archeological heritage of Cashel is afforded a high level of protection in the Cashel and Environs Development Plan 2009-2015. Policy ENV 5: Cashel City Walls sets out the Councils policy for the management and protection of the City Walls. Archeological remains in the town and environs will be subject to protection from damage and loss, and a requirement for monitoring and recording of archeological remains (where appropriate) is set out in policy ENV 3: Archeology. In line with the recommendations of the DEHLG the entire Sites and Monuments Record for the Town and Environs has been included in the Cashel and Environs Development Plan 2009-2015 - Map 4. A specific new policy that relates to the Rock of Cashel and its existing place on the tentative list for UNESCO World Heritage Site designation has been included in the Development Plan, Section 4.2.1 and Policy ENV 4: The Rock of Cashel.

In line with the recommendations of the Public Realm Plan, it is a key objective of the Development Plan to improve public access to the built and natural resources of Cashel. Therefore, Cashel's public realm is addressed in Section 4.3 the Built Environment of the Development Plan and a specific policy is inserted entitled - Policy ENV 6: Improving Cashel's Public Realm.

Chapter 6 refers to the Town Centre and contains policies designed to both promote and develop the town centre and to protect and enhance the cultural assets of the town as part of new economic development, i.e. Policy TC 1: Enhancing the Town Centre, Policy TC 2: Enhancement of Public Realm, Policy TC 5: Shop Fronts.

4.5.2 Mitigation of potential impacts on Landscape/Views and Visual Setting

Landscape/Views and visual setting EPOs

V1	Promote conservation and enhancement of townscapes and the urban environment
V2	Promote conservation and enhancement of landscapes and the rural environment

The Cashel and Environs Development Plan 2009-2015 acknowledges the importance of both the urban townscapes and the rural landscapes. The townscapes and streetscapes are vital for the character of the town and the rural landscapes provide the backdrop and setting for the Rock of Cashel. The preparation of the Development Plan and Environmental Report was supported by the preparation of a detailed Visibility Analysis of the Rock of Cashel and other Monuments with regard to the Protection of Heritage. Details of this are set out in Appendix 3 and zones of sensitivity in the Plan area are outlined. Specific sites have been identified as being especially sensitive, and in view of this, Special Development Objectives have been prepared for these sites, and are set out in Appendix 9 of the Development Plan. The Visibility Analysis of the Rock of Cashel and other Monuments with regard to the Protection of Heritage was carried out by Arc Architectural Consultants Ltd in association with the Department of Environment, Heritage and Local Government and Cashel Town Council. The Development Plan contains a detailed Section 4.5 Cashel Visual Assessment and policy

objective ENV 14: Zones of Visual Sensitivity which aim to protect and enhance the setting of Cashel's architectural heritage.

Chapter 6 entitled - Town Centre Strategy, contains the majority of policies designed to manage and protect the unique streetscapes of the town. Policy TC 2: Enhancement of the Town Centre and Public Realm is designed to seek improvements to the public realm as part of new development, Policy TC 5: Shop Fronts is designed to require the retention of existing shop fronts (where appropriate) and to require the provision of appropriate shop fronts where new retail units are proposed. Policy TC 6: Advertising and Signage refers to the provision of appropriate signage.

Chapter 5 refers to the Amenity, Built and Natural Environment and Heritage of Cashel. It is recognised that the urban streetscapes contribute to the unique character of the town, therefore, policies are included that will seek the retention of existing buildings of merit ENV 11: Retaining Buildings of Merit and the renovation of derelict sites ENV 10: Derelict Sites policies are designed to enhance the streetscapes of Cashel.

Chapter 9: Development Management Standards sets out detailed management standards for new development that could impact on the streetscape.

The protection of the rural landscape is a key principle of the Cashel and Environs Development Plan 2009-2015, and this is further supported by the provisions of a detailed visual impact assessment which forms the basis for visual analysis of new development proposals. Map 1 sets out the landzoning for Cashel and its Environs and the zoning of land for special amenity will protect the character of the landscape in the vicinity of the Rock. This will ensure that inappropriate development is redirected from that landscape of high importance in the immediate vicinity of the Rock. This policy approach is set out in policy ENV 12: Special Landscape Area and Policy ENV 15: Listed Views.

4.5.3 Mitigation of potential impacts on Water resources

Water Resources EPOs

W1	Promote sustainable water consumption based on long-term protection of available water resources.
W2	Promote sustainable urban drainage systems as part of proposals for new development.
W3	Achieve and maintain water quality standards and reduce discharges of pollutants or contaminants to waters.
W4	Protect and conserve the quality, character and distinctiveness of geological and geomorphological systems, sites and features.

The long-term management of water resources has been identified as a key environmental issue for Cashel. The management of water resources involves public water supply, wastewater and surface water management, and how they impact on surface and ground water quality. These areas are inextricably interlinked. The objective for sustainable growth of Cashel is dependent on sustainable water management.

Chapter 8 of the Cashel and Environs Development Plan 2009-2015 refers to infrastructure and sets out the main policies and objectives regarding of the future growth of Cashel and the provision of new water services infrastructure in an integrated manner.

Water services infrastructure will be provided by both developer led projects and the construction of new infrastructure by the local authority through funding under a proposed serviced land initiative. The construction of a new foul trunk mains through the environs to eventually link with the existing wastewater treatment plant located on the Golden Road will be a critical element of the provision of adequate infrastructure to service lands zoned for development.

Section 8.2 of the Cashel and Environs Development Plan 2009-2015 sets out provision for new foul water infrastructure. The primary focus of this will be to ensure that development proceeds in accordance with an agreed approach that will ensure the phased provision of new infrastructure throughout the environs.

The poor management of surface water run-off has the potential to cause surface water and groundwater pollution and localised flooding. It is the policy of the Council to require the on-site disposal of surface water by the attenuation of run-off to greenfield levels. It is the policy of the Council as set out in the Development Plan to seek the use of sustainable urban drainage technologies as part of new development, as set out in policy INF 7: Surface Water Management.

4.5.4 Mitigation of potential impacts on Natural Heritage, Biodiversity, Flora & Fauna

EPO for Natural Heritage, Biodiversity, Flora and Fauna:

H1	Conserve and promote the diversity of habitats and species
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New development has the potential to impact negatively on natural heritage especially by virtue of encroachment on undeveloped land or by insensitive approach to development of sensitive sites.

Cashel does not have any designated environmental sites however; the urban and rural environs contain a range of different habitats that provide for diversity and richness of species within the Cashel and Environs Development Plan 2009-2015 Plan boundary.

The strategy of the Cashel and Environs Development Plan 2009-2015 aims to consolidate the existing urban area and to permit expansion of development into greenfield lands only where it has been proven as necessary. This sequential approach will retain greenfield lands free from unnecessary development and will favour new development on brownfield or derelict sites.

Chapter 4 contains a policy to maintain a clear development boundary to the town and to maintain a clear distinction between urban areas and the rural hinterland Policy ENV 7: Urban Fringe and Sequential Approach to Development. Lands zoned for special amenity use north of the Rock will be maintained free from development, and this will provide for a green lung that will extend from the town centre, the Rock and northwards into the rural countryside thus, providing valuable access for fauna.

The provision of and retention of existing natural features such as gardens and parklands is an objective of the Cashel and Environs Development Plan 2009-2015 as set out in chapter 4. Policy ENV 13: Open Space and Residential Development refers to the aim of the Council to facilitate a new town park on lands at The Rock and policy ENV 16: Listed Trees, refers to protection of listed trees.

The protection of the agricultural landscape from inappropriate development and encroachment by urban generated development and land use in the rural environs is a key factor in retaining existing biodiversity. It is the policy of the Cashel and Environs Development Plan 2009-2015 to permit new development on lands zoned for agriculture only where it complies with policy ECON 4: Rural Enterprise and on-farm Diversification.

4.5.5 Mitigation of potential impacts on Local Air and Climate

EPO for Local Air and Climate

L1	Reduce the need to travel by private car, and promote alternative sustainable transport modes.
L2	Encourage energy efficiency in building design and maximise the use of renewable energy forms.
L3	Reduce and minimise all forms of air pollution and promote tree planting where appropriate.

It has been acknowledged in this Environmental Report, that the Cashel and Environs Development Plan 2009-2015 has little potential to have an adverse impact on issues such as climate or air quality and that county, regional or national level plans have a greater real potential to impact on such issues.

However, the potential for Cashel to contribute at a local level to a reduction in air quality or to climate change is addressed in the Development Plan. The overall strategy of the Development Plan is to consolidate the existing built form of Cashel as an alternative to the expansion of development into the rural environs. This is a positive approach to ensuring that any potential impact on climate change or air quality is mitigated, by virtue of reduced need to travel. The potential for construction of sustainable transport i.e. pedestrian, cycle and vehicular is improved when a compact and sequential approach to urban development is undertaken.

Policies INF 4: Public Transport and INF 5: Pedestrian and Cycle Routes refer to the enhancement of public transport and the provision of pedestrian and cycling routes and key linkages. The provision of sustainable accessibility and transport are key objectives of Master Plan areas (Refer to Appendix 3 of Development Plan).

Policy INF 1: Development of an Integrated Transport Network and Local Road Network refers to the provision of an Integrated Transport Network and local road network in accordance with the indicative routes set out on Map 1 of the Development Plan.

Furthermore, the Cashel and Environs Development Plan 2009 contains strong policies to require the construction of sustainable structures both domestic and non-domestic, as set out in policies INF 16: Sustainable Building Design – Non-Domestic and HSG 9: Sustainable Building Design.

4.5.6 Mitigation of potential impacts on Population, Human Health & Materials Assets.

During the assessment of the performance of alternative scenarios against SEOs and SDOs, as set out in Table 4.1, it was found that the chosen development alternative would result in a positive impact on population and human health and material assets. This likely positive impact is envisaged to arise as a result of the approach of the selected development

strategy. In view of this, the Plan contains inherent policies and objectives designed to mitigate against potential impacts on Material Assets and Population and Human Health. All development objectives are tested against any potential environmental impact as set out in Appendix 1: Matrix - Environmental Assessment.

4.6 Testing of policy approach of Cashel and Environs Development Plan 2009-2015 for compatibility with SEOs

The EPOs provide a standard against which the individual policies of the Cashel and Environs Development Plan 2009-2015 were proofed or tested for compatibility so that the potential significant adverse environmental impacts and significant positive impacts could be highlighted and mitigated for, respectively. Significant effects include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative. However, for the purposes of avoiding overly complex matrices³¹, the potential impacts as set out were condensed into the following: Beneficial, Uncertain, Adverse, No relationship or Insignificant Impact. A Matrix (Appendix 1) was used to test each individual policy of the Cashel and Environs Development Plan 2009-2015 for its compatibility with each SEO, this was an ongoing process and resulted in a number of amendments and alterations to the policy of the Cashel and Environs Development Plan 2009-2015 to ensure that mitigation measures were provided to address potential adverse environmental effects. The matrix indicates the following potential impacts on each SEO:

1. Beneficial Impact (+),
2. Uncertain Impact (?),
3. Adverse Impact (-),
4. No Relationship or Insignificant Impact (o).

4.7 Conclusion

The development strategy as set out in the Cashel and Environs Development Plan 2009 - 2015 will have an impact on the environment. However, it has been established that any adverse environmental impact of the implementation of the Cashel and Environs Development Plan 2009-2015 will not be significant. Potential effects have been appropriately mitigated throughout the Cashel and Environs Development Plan 2009-2015, by the use of appropriate mitigation measures.

Ongoing monitoring (Chapter 5) proposed during the lifetime of the Cashel and Environs Development Plan 2009-2015 (when adopted) will ensure that the environmental quality of Cashel and its environs and adjoining areas will be protected.

³¹ P33 Guidelines for Regional Authorities and Planning Authorities, Assessment of the effects of certain plans and programmes on the environment, DEHLG.

5.0 Monitoring Measures

A monitoring programme to measure potential effects of the implementation of the Cashel and Environs Development Plan 2009-2015 on the environment is set out below. Appropriate targets are set out for each SEO. The focus of the monitoring programme is on those aspects of the environment most likely to be affected by the implementation of the Cashel and Environs Development Plan 2009-2015; however, monitoring measures for each aspect of the receiving environment are set out. The purpose of the monitoring programme is to identify at an early stage any unforeseen adverse effects that the Cashel and Environs Development Plan 2009-2015 may have, so as to be able to undertake any required appropriate remedial action.

Aspect of Receiving Environment	Selected Indicators	Selected Targets	Monitoring Source
Cultural Heritage	Loss or damage to designated archaeological sites.	To safeguard archeological sites in line with Policy ENV 3: Archeology of the Development Plan.	Planning Department
	The loss of streetscape features in Cashel core (street furniture, stone steps and railings, front boundaries, formal gateway, sash windows and shop fronts and decorative details etc.)	To safeguard and maintain the existing features and fixtures of the streetscape within the Architectural Conservation Area, in line with policy ENV 2: Architectural Conservation Area.	Planning Department
	The loss or damage of Protected Structures.	To protect Protected Structures in line with the Cashel and Environs Development Plan 2009-2015 Policy ENV 1: Protected Structures.	Planning Department
	Loss or damage to the Cashel City Walls.	To protect Cashel's City Walls in line with the Development Plan 2 Policy ENV 5: Cashel City Walls.	Planning Department

	The loss of those buildings / structures not identified for protection, i.e. buildings of special local historic or architectural interest, which form important landscape or townscape features and / or are important to the cultural heritage of the area.	To prevent the loss of existing structures not listed for protection however, which contribute to the character of Cashel and its Environs in line with Policy ENV 11: Retaining Buildings of Merit.	Planning Department
	That identified derelict / abandoned historic buildings continue to remain unused /unrefurbished.	To secure the reuse/ renovation / reconstruction of identified derelict / abandoned historic buildings / structures through Policy ENV 10: Derelict Sites.	Planning Department
Water	Biological Rating (Q Rating).	To improve the biological rating of the River Suir, in line with the requirement to maintain good water status under the Water Framework Directive, by 2015.	Environment Department
	Phosphorous per litre of surface water	To reduce / keep at its current level the amount of phosphorous in surface waters.	Environment Department
	Upgrading works on storm water overflows.	To identify works programme and commence works on storm water overflow system, to reduce discharge of untreated storm water overflow to Black Stream.	Water Services /Environment Department and Area Engineer
Landscape	Nature of and numbers of planning applications permitted on land zoned for special amenity.	To ensure that new development that has potential to impact on the visual setting of the Rock of Cashel does not occur, in line with Policy ENV 12: Special Landscape Area.	Planning Department
Population and Human Health	Preparation of the St Patrick Rock Master plan by the Council.	To facilitate provision of new parklands, public access and amenity facilities in this area, in line with provisions of Appendix 3.	Planning Department

Material Assets	Continuation of the proliferation of suburban house / development building forms and site layouts.	That new development provides for a greater variation of housing types, higher quality amenity provision and traffic calming by design.	Planning Department
	The use of domestic sustainable energy technologies within new housing developments.	That sustainable energy technologies are incorporated into new developments.	Planning Department
	Waste water treatment units and percolation areas designed, installed and maintained in line with the EPA's Wastewater Treatment Manual for Treatment systems for Single Houses (2000) as amended.	That all new and upgraded wastewater treatment systems on land zoned for agriculture be installed as per the EPA's (2000) as amended Wastewater Treatment Manual – Treatment Systems for Single Houses and that site investigations (reports), system design and system installation be carried out / supervised, as appropriate, by person listed on the Councils site suitability assessors list.	Planning and Environment Departments
	Numbers of new houses built in linear fashion along the public roads, which result in the creation of barriers for wildlife.	To resist a pattern of linear roadside development within the Cashel and Environs Development Plan boundary.	Planning Department

Cashel and Environs Development Plan 2009-2015

Environmental Report



APPENDIX 1 - 3

APPENDIX 1 Environmental assessment of the policies of the Cashel and Environs Development Plan 2009-2015

Environmental assessment of the policies of the Cashel and Environs Development Plan 2009-2015																		
Beneficial Impact (+) Uncertain Impact (?) Adverse Impact (-) No Relationship or Insignificant Impact (o)	Cultural Heritage	Landscape Views Visual setting		Water resources				Natural Heritage	Population human	Material Assets and soils				Local Air and Climatic Factors			Comments (incl long term/short term effects)	
		V1	V2	W1	W2	W3	W4	H1	P1	M1	M2	M3	M4	L1	L2	L3		
EPO	C1																	
SP 1: Balanced development of Cashel town and Environs	?	+	+	+	+	?	?	?	+	+	+	?	?	+	+	?		Long-term positive benefits for population, material assets and Local air and Climatic factors. Benefits and uncertainties for water resources, natural heritage, landscape and cultural heritage. Long-term Positive benefits due to promotion of a more balanced form for the town.
HSG 1: New Residential Development	?	?	?	+	+	+	?	+	+	+	+	+	+	+	+	+		Approach to new residential development that directs new development to zoned and serviceable lands, is considered sustainable in the long-term.
HSG 2: Residential Master Plan - Deerpark	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+		Identification of a Master Plan area at Deerpark, will require a cohesive and integrated approach to development, this is considered to be a positive approach. Long term benefits.
HSG 3: Neighbourhood Centres	o	o	o	+	+	+	+	o	+	+	+	+	+	+	o	o		Medium term benefits associated with policy for neighbourhood centres.
HSG 4: Housing Strategy Review 2008	o	o	o	o	o	o	o	o	+	o	o	o	o	o	o	o		Implementation of housing strategy will have long-term impacts for human health by promotion of a socially inclusive society. No relationship with other SEOs.
HSG 5: Nursing Homes/Retirement Homes	o	o	o	o	o	o	o	o	+	o	o	o	o	+	+	o		Long-term benefits for population and local air and climate. Not relevant for other SEOs.
HSG 6: Accommodation of the Travelling Community	o	o	o	+	+	+	?	o	+	+	o	o	o	+	o	o		No long-term negative environmental impacts. Uncertainties for impact on material assets, cultural/heritage and views. Positive for population, due to requirement for provision of accommodation for a marginal group.
HSG 7: Individual Houses in the Rural Environs	?	-	-	o	o	?	?	-	?	-	-	-	o	-	o	o		Policy which manages rural housing, however, permits one-off housing in certain circumstances has potential for long-term impacts on landscape and views, natural heritage, material assets and local air and climate.
HSG 8: Design of Individual Houses	+	+	+	o	o	o	o	o	+	o	o	o	o	o	o	o		Long-term benefits for landscape and cultural heritage and population. Not relevant for other SEOs.

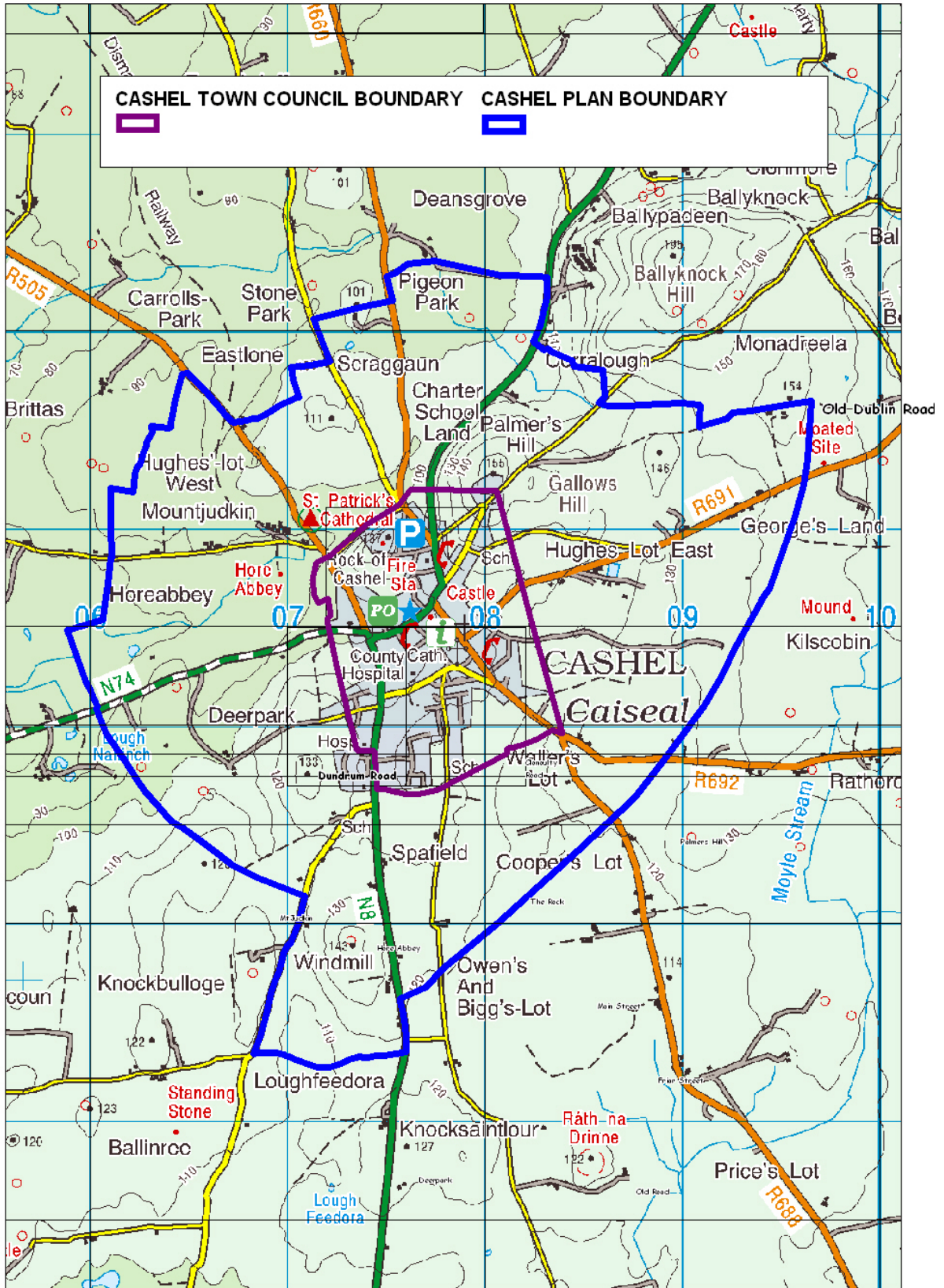
HSG 9: Sustainable Building Design	?	?	?	o	+	+	o	o	+	+	+	o	o	o	+	+	Short term uncertain impacts on heritage and views due to potential use of alternative /innovative designs. However, long term beneficial impacts on other SEOs.
ENV 1: Protected Structures	+	+	+	o	o	o	o	o	+	+	o	+	o	o	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets.
ENV 2: ACA	+	+	o	o	o	o	o	o	+	+	o	+	o	+	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets.
ENV 3: Archaeology	+	+	+	o	o	o	o	o	+	+	o	o	o	+	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets.
ENV 4: The Rock of Cashel	+	+	+	o	o	o	o	o	+	+	o	o	o	+	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets.
ENV 5: Cashel City Walls	+	+	o	o	o	o	o	o	+	+	o	+	o	+	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets.
ENV 6: Improvong Cashels Public Realm	+	+	o	o	o	o	o	o	+	+	o	+	o	+	o	o	Positive impact on cultural and heritage, urban views, humans, material assets.
ENV 7: Urban Fringe and Sequential Approach to Development	+	+	+	+	+	+	o	+	+	+	+	+	o	+	o	o	Long-term positive benefits for all SEOs as this policy will protect against haphazard encroachment into the rural environs
ENV 8: Approach Roads and Gateway Development	+	+	+	o	o	o	o	o	+	+	o	o	o	+	o	o	Long-term positive benefits for many SEOs, no relationship with certain SEOs
ENV 9: Entry and Gateway Improvements	?	?	?	o	o	o	o	o	+	?	o	o	o	o	o	o	No relation shop with cultural heritage, Views, Water resources. Long-term benefits for natural heritage and humans. Uncertainty for material assets.
ENV 10: Derelict Sites	+	+	o	o	o	o	o	o	+	+	+	+	o	+	?	o	Short term positive impacts for Cultural heritage, visual setting, humans, materials assets, as this policy will operate to reduce the numbers of derelict sites in the town.
ENV 11: Retaining Buildings of Merit	+	+	o	o	o	o	o	o	+	+	+	+	o	+	+	o	The reuse of existing buildings instead of new construction will confer positive impacts on many SEOs.
ENV 12: Special Landscape Area	+	+	+	o	o	o	o	+	+	-	o	+	o	o	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets. Conflict with need to maximise use of built environment as, over the long-term may lead to pressure on lands elsewhere.
ENV 13: Open Space and Residential Development	o	o	o	o	o	o	o	+	+	o	o	o	o	+	o	o	Positive impacts for humans and for biodiversity due specific policy to address the protection of existing green spaces and provision of additional space.
ENV 14: Zones of Visual Sensitivity	+	+	+	o	o	o	o	+	+	-	o	+	o	o	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets. Conflict with need to maximise use of built environment as, over the long-term may lead to pressure on lands elsewhere.
ENV 15: Listed Views	+	+	+	o	o	o	o	+	+	-	o	?	o	o	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets. Conflict with need to maximise use of built environment as, over the long-term may

																		lead to pressure on lands elsewhere.
ENV 16: Listed Trees	+	+	+	o	o	o	o	+	+	-	o	+	o	o	o	o	o	No impact/not relevant on most SEOs. Positive impact on cultural and heritage and views and material assets
ECON 1: Employment Growth and Promotion	?	?	?	?	?	-	?	-	+	?	?	?	?	+	o	o	o	Potential long-term impacts on water resources and biodiversity. Mitigation measures shall mitigate potential impact.
ECON 2: Key Employment Master Plan Areas	+	+	+	+	+	+	+	+	?	-	?	+	?	+	+	?	?	Long-term positive impacts on most SEOs as a result of identifying key areas for employment, with targeted infrastructure
ECON 3: Integrated Tourism Strategy	?	?	?	-	?	-	?	?	+	?	?	?	?	-	?	?	?	Potential long-term impacts on water resources and local air and climate as a result of attracting increased tourist numbers.
ECON 4: Rural Enterprise and On-Farm Diversification	?	?	?	?	o	?	o	?	+	-	?	?	?	-	?	?	?	Potential adverse impacts on material assets and local air and climate as a result of facilitating development in rural areas.
ECON 5: Non-Conforming Uses	-	-	-	?	?	?	?	?	?	+	?	?	?	?	?	?	?	Potential short-term negative impacts on cultural heritage and views due to nature of non-conforming uses. Positive impact on humans as existing enterprises will be facilitated.
ECON 6: Prevention of Major Accidents	o	o	o	+	o	+	o	+	+	o	o	o	o	o	o	o	o	This policy will confer a positive effect in areas of water, natural heritage and humans. Other SEOs will not be impacted upon
TC 1 Enhancing the Quality of the Town Centre	+	+	o	o	o	o	o	o	+	+	o	+	o	+	o	+	+	No adverse environmental impact. Positive effects only.
TC 2: Enhancement of Public Realm.	+	+	+	o	o	o	o	o	+	+	o	+	o	+	o	+	+	Significant positive effects on cultural heritage, humans, material assets and local air and climate.
TC 3: Retail Function of Primary Retail Area	o	o	o	o	o	o	o	o	+	+	o	o	o	+	o	+	+	No relevant environmental impacts over most SEOs however, there will be positive impact on areas of population, material assets and local air and climate.
TC 4: Retail Strategy for Cashel	o	o	o	o	o	o	o	o	+	+	o	o	o	+	o	+	+	No adverse environmental impact. Positive effects only.
TC 5: Shop Fronts	+	+	o	o	o	o	o	o	+	+	o	o	o	o	o	o	o	No relevant impact on all SEOs except Cultural Heritage, Views, Humans and Material assets which will be positively impacted upon
TC 6: Advertising and Signage	+	+	o	o	o	o	o	o	+	+	o	o	o	o	o	o	o	No relevant impact on all SEOs except Cultural Heritage, Views, Humans and Material assets which will be positively impacted upon
TC 7 Takeaway Outlets	+	+	o	o	o	o	o	o	?	o	o	o	o	?	o	o	o	The restriction of takeaways will have a positive effect on cultural heritage; however, there will be uncertain impacts on humans and local air and climate.
TC 8 Alternative Car-Parking Facilities	?	?	?	o	o	o	o	o	?	+	o	o	o	-	o	-	-	Adverse effects on local air and climate factors as this will facilitate travel by car.
TC 9: Car-Parking Requirements of New Developments	?	?	?	o	o	o	o	o	+	o	o	o	o	o	o	o	o	Positive impact for humans as this will facilitate car-parking, however, the enhancement of car-parking facilities has little positive impact elsewhere, and has uncertain impacts on some

																		SEOS
CS 1 Interagency Cooperation and Collaboration	o	o	o	o	o	o	o	o	+	+	o	+	o	+	o	o		No relevant impact on all SEOs except Cultural Heritage, Views, Humans and Material assets which will be positively impacted upon
CS 2 Addressing Social Inclusion	o	o	o	o	o	o	o	o	+	+	o	+	o	+	o	o		No relevant impact on all SEOs except Cultural Heritage, Views, Humans and Material assets which will be positively impacted upon
CS 3: Arts and Culture	o	o	o	o	o	o	o	o	+	+	o	+	o	+	o	o		No relevant impact on all SEOs except Cultural Heritage, Views, Humans and Material assets which will be positively impacted upon
CS 4: Childcare Facilities	o	o	o	o	o	o	o	o	+	+	o	+	o	+	o	o		No relevant impact on all SEOs except Cultural Heritage, Views, Humans and Material assets which will be positively impacted upon
CS 5: Education Facilities	o	o	o	+	+	+	o	o	+	+	+	o	o	+	o	o		The forward planning of necessary services such as schools will confer a positive impact on may SEOs
CS 6: Community Amenity	o	o	o	o	o	o	o	+	+	+	o	o	o	+	o	+		No adverse environmental impact. Positive effects only or no relationship with SEOs
CS 7: Library and Information Access	o	o	o	o	o	o	o	o	+	+	o	+	o	+	o	o		No adverse environmental impact. Positive effects only or no relationship with SEOs
INF 1 I Development of an Integrated Transport and Local Road Network	+	+	+	o	o	o	o	?	+	+	o	+	o	+	o	+		No adverse environmental impact. Positive effects only or no relationship with SEOs
INF 2: Transport and Traffic Assessment	o	o	o	o	o	o	o	o	+	+	o	+	o	+	o	+		No adverse environmental impacts.
INF 3: Protection of carrying capacity of M8 Cashel By-Pass and N74	o	o	o	o	o	o	o	o	+	+	o	+	o	+	o	+		Positive impacts on humans, material assets and local air and climate.
INF 4: Public Transport	o	o	o	o	o	o	o	+	+	+	o	+	o	+	o	+		Positive impacts on natural heritage, humans, material assets and local air and climate
INF 5 Pedestrian and Cycle Routes	o	o	o	o	o	o	o	o	+	+	o	+	o	+	o	o		No adverse environmental impact. Positive effects only or no relationship with SEOs
INF 6 Wastewater				+	+	+	o	o	+	+	o	+	+	o	o	o		This policy for long-term infrastructural improvements has greatest potential to confer a positive impact on water resources
INF 7 Surface Water Management	o	o	o	+	+	+	o	o	+	+	o	+	+	o	o	o		This policy for long-term infrastructural improvements has greatest potential to confer a positive impact on water resources
INF 8: Potable Water	o	o	o	+	+	+	?	+	+	+	o	o	+	o	o	o		The extensive use of SUDs has an uncertain impact on local groundwater, as detailed geological studies have not been undertaken. Mitigation measures applied.
INF 9: Flood Risk Assessment	o	o	o	+	+	+	+	+	+	+	o	+	+	o	o	o		Prevention measures offer greatest potential to have a positive impact on water resources, natural heritage, humans and material assets.

INF 10: Access to Electrical Supply Networks	o	o	o	o	o	o	o	o	+	+	o	o	o	o	o	o	This policy will have a benefit for humans and for maximising the use of the existing built environment, by the provision of the services required. No relationship with other SEOs
INF 11 Access to Natural Gas	?	o	o	o	o	o	o	o	+	+	o	o	o	o	+	o	No relevant impact on all SEOs except Humans, Material assets and local air and climate that will be positively impacted upon. Not clear whether this policy will impact on cultural heritage.
INF 12 Broadband:	o	o	o	o	o	o	o	o	+	+	o	o	o	o	o	o	This policy will have a benefit for humans and for maximising the use of the existing built environment, by the provision of the services required. This will facilitate working from home, thus reducing need to travel. No relationship with other SEOs
INF 13 Telecommunications	?	?	?	o	o	o	o	o	?	+	o	o	o	o	o	o	Not relevant or unclear impact in general
INF 14 Waste Management	o	o	o	o	o	o	o	o	+	+	+	+	o	+	o	+	Implementation of waste strategy has clear positive impacts.
INF 15 Polluter Pays	o	o	o	+	+	+	o	+	+	o	+	+	o	o	o	+	Implementation of polluter pays has clear positive impacts by offering a deterrent to polluters.
INF 16 Sustainable Building Design - Non Domestic	?	?	?	+	+	+	o	+	+	+	+	o	o	+	+	+	Positive impacts in general. Uncertain impact on cultural heritage due to potential use of alternative materials and finishes etc.
DM 1: Development Standards	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	+	Development standards are based on the principles of long term sustainable development, thus offer positive impacts

APPENDIX 2 PLAN BOUNDARY



APPENDIX 3

VISIBILITY ANALYSIS OF THE ROCK OF CASHEL & OTHER MONUMENTS WITH REGARD TO THE PROTECTION OF HERITAGE

1.0 Introduction

ARC Architectural Consultants Ltd were retained by the Department of the Environment, Heritage and Local Government, in conjunction with Cashel Town Council and South Tipperary County Council to undertake a visibility analysis of St. Patrick's Rock and of other monuments in Cashel. The purpose of this Visibility Analysis is to identify locations in the town and surrounding area from which the Rock of Cashel is visible and locations which are visible from the Rock of Cashel in order to pinpoint views and prospects, which contribute to the heritage value and cultural significance of the Rock of Cashel. This Visibility Analysis was prepared pursuant to Section 4.5 Cashel Visual Assessment of the *Cashel and Environs Development Plan 2009-2015 and Environmental Report: Proposed Material Amendments* document (February 2009), which states:

"A visual assessment of the setting of Cashel's built heritage has been carried out as part of the Strategic Environmental Assessment of the Plan, and is set out in the Environmental Report. This preliminary visual assessment will form the framework for a more detailed Visual Impact Assessment of the Plan area, which is currently being prepared by Arc Consultants in association with the Department of the Environment, Heritage and Local Government and Cashel Town Council. While it is acknowledged that all areas within the Plan area are of visual significance due to the importance of the Built Heritage of Cashel, the assessment sets out to geographically define those areas of high and medium visual significance. Zones of visual sensitivity are set out in Figure 4.6 Zones of Visual Sensitivity."

2.0 Consultation

Prior to undertaking detailed quantitative and qualitative analysis, ARC Architectural Consultants Ltd carried out consultation with the Planning Authorities of South Tipperary County Council and Cashel Town Council in order to identify the key objectives of the *Cashel and Environs Development Plan 2009-2015* for the development of the town. Consultation with the local authorities was instructive in identifying the likely challenges that key development objectives will pose for the protection of visual amenity and heritage in Cashel (e.g., the existence of desirable development lands at visually sensitive locations; the desirability of views towards the Rock). This consultation also indicated locations where the strengthening of visual links between the Rock and the Town Centre should be a priority in order to draw tourists from the Rock into the town (e.g., links between Dominic's Abbey and the Rock, links between the Main Street and the Rock and links between the Bolton Library / the Cathedral of St. John the Baptist and the Rock). During the preparation of this Visibility Analysis, communication between ARC and the local authorities, as experts familiar with the key planning issues facing the town, remained open throughout the process to facilitate their input into the production of the study. Given the high density in the area of sites listed in the Sites and Monuments Record (including a large area which comprises the majority of the town), consultation was also carried out with Margaret Keane of the Heritage and Planning Division of the Department of the Environment, Heritage and Local Government.

A meeting was held with Margaret Keane of the National Monuments Service on the morning of 3rd March, 2009 to inform a better understanding of the primary concerns of the DoEHLG in relation to the protection of heritage and views and prospects of heritage and cultural significance for the town of Cashel and its environs. The consultation with the DoEHLG indicated that their primary concern, with regard to visual impact, comprised the impact of

future development on the setting of and relationship between the group of monuments within and surrounding Cashel. In particular, having considered the proposed tentative nomination of the Rock of Cashel as a UNESCO World Heritage Site, the protection of the grouping of and interrelationships between St. Patrick's Rock, Hore Abbey, Dominic's Abbey, the Cathedral of St. John the Baptist, the Bolton Library and the Windmill Hill Ringfort is of critical importance. Given information gathered during the consultation phase, the Visibility Analysis had particular regard to the inter-visibility and relationship between the Rock of Cashel, Hore Abbey, Dominic's Abbey, the historic core of Cashel and other monuments within the Plan area (discussed in more detail below). Further consultation with the DoEHLG took place throughout the production of a **Visibility Analysis** report in order to ensure that their concerns in relation to visibility and visual impact were addressed in as complete a fashion as possible.

Consultation for the purposes of information gathering (e.g., in relation to detailed topographical data for the Rock) also took place with the Office of Public Works and with the DoEHLG in general during early March 2009.

3.0 Quantitative Analysis – Identification of the Zone of Visual Influence

This Visibility Analysis seeks to identify views and prospects, which contribute to the heritage value and cultural significance of the Rock of Cashel and other monuments, by utilising a two-step process involving (i) quantitative analysis and (ii) qualitative analysis. The first step, quantitative analysis, identifies what views are possible, while the second step, qualitative analysis (which is discussed in more detail below), considers the cultural significance or importance of the views identified during the first step.

The product of the first step, quantitative analysis, is a diagram illustrating the *Zone of Visual Influence (ZVI) of St. Patrick's Rock*, i.e., a diagram indicating areas which are visible from the Rock / areas from which the Rock is visible. Using proprietary land survey and modelling software, a digital viewshed was created using a three dimensional digital terrain model of a 15 kilometre square area centred on the Rock to give a general indication of potential sight lines between St. Patrick's Rock and the topography surrounding the Rock. The digital viewshed provides only a rough illustration of areas of potential visibility as it does not take account of structures or vegetation that might intervene in views to and from the Rock. The digital viewshed diagram, as shown a Figure 1 below, illustrates areas which have the potential to be visible from the Rock as lighter areas. In the alternative, the digital viewshed can be depicted as shown at Figure 2 with blue areas showing areas of visual sensitivity. This digital viewshed was then refined by an on-site survey of visibility in order to identify where views to and from the Rock might be obscured by intervening structures or vegetation. This survey was undertaken by driving the roads within the 15 kilometre square area surrounding Cashel and walking the streets within Cashel to identify areas from which the Rock is visible. The Zone of Visual Influence diagrams at Figures 3 and 4 (showing the ZVI for the wider area) and Figure 5 (showing the ZVI for the town of Cashel) below indicate locations on paths and roads from where there is open visibility of the Rock with a solid red line and locations from where there is broken visibility with a broken red line.

4.0 Qualitative Analysis – Visual Sensitivity & Cultural Significance of Views

Having completed a comprehensive analysis of Cashel and its environs to identify zones from where the Rock is visible and zones which are visible from the Rock, the character, quality and cultural significance of views from these zones was then assessed. The qualitative analysis was carried out on-site by W.H. Hastings FRIAI (Grade I Conservation Architect) of ARCI and by Michael Cregan, Landscape Architect, of Michael Cregan & Associates.

The purpose of the qualitative analysis is to:

- Identify locations which are visually sensitive because they form part of the setting of the Rock.
- Identify the extent of the historic core of Cashel where there is a potential for enhanced visual connections with the Rock.
- Identify areas of moderate visual sensitivity in views from the Rock.

A visually sensitive area is an area where, by virtue of its location, topography, character or available views, should new development take place, this new development has the potential to obliterate views or to alter (positively or negatively) the visual quality of vistas of cultural or social significance. The character of an impact: positive, negative or neutral, will depend on how well a development is designed and sited and received by the public, and on the general contribution of the development to the built environment and landscape. The character of a visual impact and even the duration of a visual impact, is very dependent on the attitude of the viewer. If a viewer is opposed to a new building for reasons other than visual, that viewer is likely to see the building in a negative light, no matter beautiful the building might be. It is also the case that a building thought startling when first built, in time becomes part of the background, and what at first might have been regarded by the public a significant impact, fades to slight. Though buildings are intended to be permanent, and will be permanently visible, the extent of visual impact associated with a building often diminishes with time.

There is an added dimension to the identification of visually sensitive areas in Cashel in that the significance of the Rock of Cashel as a site of unique architectural and archaeological value lies in its relationship and visual connection to other monuments in the vicinity such as the historic core of the town of Cashel, Hore Abbey, Dominic's Abbey and the Windmill Hill Ringfort. If new development occurs in a visually sensitive area, which reduces the inter-visibility between monuments or alters the character or setting of monuments, there is not only a visual impact, but also a heritage impact. Where historic views between monuments are eliminated by new development, this must have a negative heritage impact. However, there is a potential for positive heritage impacts where visual links between monuments are strengthened or existing negative visual impacts caused by existing development are mitigated (e.g., by landscape screening). Similarly, new development in visually sensitive areas could have a positive or negative heritage impact depending on how it responds to the setting and character of a monument or site of architectural or archaeological heritage significance.

In this regard, it was considered that the principles set out in the ICOMOS International Charter for the Conservation and Restoration of Monuments and Sites (the Venice Charter, 1964) and the ICOMOS Charter on the Conservation of Historic Towns and Urban Areas (the Washington Charter, 1987) were instructive for the purposes of undertaking the qualitative analysis portion of this Visibility Analysis. It is considered significant that Article 1 of the Venice Charter states that:

'The concept of an historic monument embraces not only the single architectural work but also the urban or rural setting in which is found the evidence of a particular civilization, a significant development or an historic event. This applies not only to great works of art but also to more modest works of the past which have acquired cultural significance with the passing of time.'

The significance of groups of structures of heritage importance is also considered by the Washington Charter of 1987, as follows:

“Qualities to be preserved include the historic character of the town or urban area and all those material and spiritual elements that express this character, especially:

- a) Urban patterns as defined by lots and streets;*
- b) Relationships between buildings and green and open spaces;*
- c) The formal appearance, interior and exterior, of buildings as defined by scale, size, style, construction, materials, colour and decoration;*
- d) The relationship between the town or urban area and its surrounding setting, both natural and man-made; and*
- e) The various functions that the town or urban area has acquired over time.*

Any threat to these qualities would compromise the authenticity of the historic town or urban area.”

Therefore, in undertaking the qualitative analysis portion of this Visibility Analysis, the relationship between St. Patrick’s Rock, other monuments and the historic core of the town of Cashel was considered in depth. The urban fabric of the town of Cashel is so established and is of itself, of such historical interest that it is important that the pattern of development within the town should be maintained as a historic resource. Similarly, the relationship between the St. Patrick’s Rock and structures of architectural and archaeological heritage significance, including Hore Abbey, Dominic’s Abbey, the Bolton Library and the Cathedral of St. John the Baptist, are of particular social and cultural importance. The qualitative analysis examined visual links between the Rock, surrounding monuments and the historic core of the town in order to identify areas of particular vulnerability or sensitivity to visual impact.

The qualitative analysis of this Visibility Analysis indicated that there are three levels of visual sensitivity. The highest level of sensitivity is in areas where development might impact on views to or from the Rock and where the setting of the Rock might be affected by development including the relationship between the Rock and Hore Abbey or Dominic’s Abbey. The second level of sensitivity occurs in areas where views to or from the Rock might be impacted upon by development. There is potential for such impact to be either positive or negative. The third level of sensitivity occurs in areas where views from the Rock, but not to it, have the potential to be impacted upon by development. These three levels of visual sensitivity are mapped in Figure 3.1 below. The results of both the quantitative analysis and qualitative analysis are discussed in more detail in the section entitled *‘Findings of the Visibility Analysis’* below.

5.0 Findings of the Visibility Analysis

The landscape stretching north of St. Patrick’s Rock is characterised by a broad plain with gently rolling topography. It is an extensive and open landscape, spreading northwards towards Holycross and westwards to distant hills. The lands are in agricultural use and consist of medium sized fields bounded by mature hedges and occasional hedgerow trees. There are very few copses / shelterbelts in the landscape – a factor which emphasises its openness. The area appears not to be densely populated, with only a scattering of houses visible from St. Patrick’s Rock. Thus, this landscape forms an important component of the setting for St. Patrick’s Rock, which, in the context of this open and extensive landscape, stands out as a commanding presence. It is considered that the open character of lands surrounding the Rock is a valuable feature in asserting the importance of St. Patrick’s Rock as a unique historic resource of international importance.

The study of the Zone of Visual Influence, as refined by on-site survey, indicated large areas to the north, northwest and west of St. Patrick's Rock where all structures over ground level in the enclosure of the Rock are likely to be visible. The ZVI also indicated that St. Patrick's Rock is not visible from a large number of locations within the town of Cashel. In many circumstances where the Rock is visible, it is only possible to glimpse the structures on the Rock through gaps between buildings in the town or over the roofs of buildings. The *Cashel and Environs Development Plan 2009-2015*, at Policy Env 15: Listed Views, lists views to and from the Rock for protection. The listed views towards the Rock are generally views from the approach roads entering the town. In addition to these listed views, there are a number of views from within the Plan area that are of importance:

View from the N74 across Deerpark to the Rock:

This view is of importance because it is a view of the Rock that can be seen by motorists passing but not entering the town. When the Dublin-Cork Road passed through the centre of Cashel, every traveller on that road had a view of the Rock. The recent construction of the motorway and the bypass has reduced the number of views of the Rock available to passing motor traffic, and it is important in terms of the image of Cashel that any views that do exist from either the motorway or the Cashel bypass be retained. The lands at Deerpark are zoned for development and are also designated as a Master Plan area. It would be important that the layout of development on the Deerpark lands would be such that the current open view from the N74 to the Rock is conserved.

Views from the motorway towards the Rock close to the Clonmel Road Interchange:

These views are important for the reasons stated above. They are less open views of the Rock than the views from the Cashel bypass and it is also the case that traffic on the motorway is likely to be travelling at higher speeds. Nevertheless, it is again important in terms of the image of Cashel that development should not obscure any glimpses of the Rock currently available from the motorway.

View from the grounds of the Cathedral of St. John the Baptist towards the Rock:

This view is important both in itself and because there is a potential a tourist trail that would include the Cathedral and the Bolton Library on a route to the Rock.

Views from the Main Street towards the Rock:

There are one or two positions on the Main Street from which it is possible to obtain views of the Rock between buildings. These views help in connecting the town to the Rock. Where possible, these views should be retained, and it is also desirable that new views towards the Rock from within the historic core be opened up. One of the most important existing views from the Main Street is that looking down towards the courthouse and onward to the Rock.

In developing the Master Plan area between the Rock and the Main Street, there is an opportunity to open up new vistas towards the Rock and thereby enhance connectivity between the town and the Rock.

Having established the Zone of Visual Influence of the Rock of Cashel, the Visibility Analysis has identified three zones of visual sensitivity (Illustrated in Figure 3.1 below):

5.1 Zone of High Visual Sensitivity

This zone is the most visually sensitive and is the area where development has the potential to impact³⁰, both on the setting of the Rock and on views to and from the rock. This zone may be divided into three overlapping components:

- The open countryside stretching north and west away from the Rock, and bounded to the east by the Old Dublin Road and to the south by the Golden Road. Development in this area has the potential to intervene in views of the Rock from the open countryside and also in the most important views from the Rock, those to the north and west.
- High ground seen behind the Rock or Hore Abbey from the north or west and which forms a backdrop to these monuments. These lands are above and east of the Old Dublin Road, and above and to the south of the Golden Road.
- Windmill Hill, which has an important visual relationship with Rock and which is a monument of historic importance in itself.

5.2 Zone of Urban Visual Sensitivity

This zone is comprised of the historic core of the town of Cashel. These areas have an historic visual relationship with the Rock, involving both views of the Rock from the town and views of the historic core from the Rock. These relationships have the potential to be renewed and reinforced by appropriate development and urban design. This zone is visually sensitive, not only because of visual connections to the Rock, but also because of its inherent historic value. Careful consideration of the visual sensitivity of this zone has the potential to enhance the urban and landscape character of Cashel as one of Ireland's most important historic towns.

5.3 Zone of Moderate Visual Sensitivity

This zone is comprised of a number of areas which impinge on views from the Rock of Cashel, and are mainly areas of high ground within the town of Cashel but outside the historic core. These are areas where views of existing development might be improved by appropriate landscape treatment, or areas where controls might be introduced to ensure that new development does not detract from views from the Rock.

Having regard to the principles set out in the ICOMOS Charters, research undertaken as part of the qualitative analysis identified that the Rock of Cashel, Hore Abbey and Dominic's Abbey have had a relationship with the historic core of Cashel for many centuries. In the last fifty years, and particularly in recent years, the town of Cashel has expanded with the construction of a number of housing estates at the periphery of the town and with the construction of individual houses along roads leading out of the town. The extent of this peripheral development is substantially greater in area than the extent of the historic core. The result is that in views from the Rock of Cashel modern development of housing estates and one-off houses appears more extensive and prominent than the historic core. It is the objective of Cashel Town Council and South Tipperary County Council to enhance the relationship between the historic core of Cashel and the Rock and to develop the tourist potential of this relationship. The visual prominence, when seen from the Rock, of development other than the historic core of Cashel militates against this objective.

³⁰ Impacts may be positive, negative or neutral

It is to be noted that the historic core of Cashel contains significant numbers of mature trees and that lands associated with the Cashel Palace Hotel, between the Rock and the historic core, also contain a significant number of mature trees. This is in contrast to the modern housing estates where there are virtually no trees. The absence of tree planting in these estates, therefore, accentuates their visual prominence. It is clear that judicious tree planting between the modern estates and the Rock could help reduce the visual prominence of these modern estates and thereby restore the historic core of Cashel to greater prominence.

It is also noted that when Hore Abbey is viewed from the pedestrian entrance to it from the road its visual backdrop is formed by two modern housing estates. Before these housing estates were constructed, its visual backdrop would have been predominantly landscape. The construction of these two estates has, therefore, significantly altered the setting of Hore Abbey. It is again noted that these two housing estates contain very little tree planting and that judicious planting in these estates and between these estates and Hore Abbey could do much to restore the setting of Hore Abbey.

The findings of this Visibility Analysis echo the concerns raised by the DoEHLG in their official response (dated 29th September 2008) to the *Development Plan 2009-2015*, particularly in relation to expansion of the town on lands to the west of the historic core and in relation to the potential for development to damage the character and setting of individual monuments and groupings of monuments. Having regard to the findings of this Visibility Analysis, policy recommendations have been formulated for inclusion in the *Cashel & Environs Development Plan 2009-2015* with regard to visual impact and the protection of visual amenity and are set out in the section entitled '*Recommendations*' below.

6.0 Recommendations

Having regard to the finding of this visibility analysis, it is recommended that the existing policy entitled Section 4.5: Cashel Visual Assessment and existing figure 4.6 Zones of Visual Sensitivity be revised, updated and integrated in to the Cashel and Environs Development Plan 2009-2015.

Note: The findings of this Visual Assessment have been fully incorporated into the Cashel; and Environs Development Plan 2009-2015. Please refer to Section 4.5 Cashel Visual Assessment.

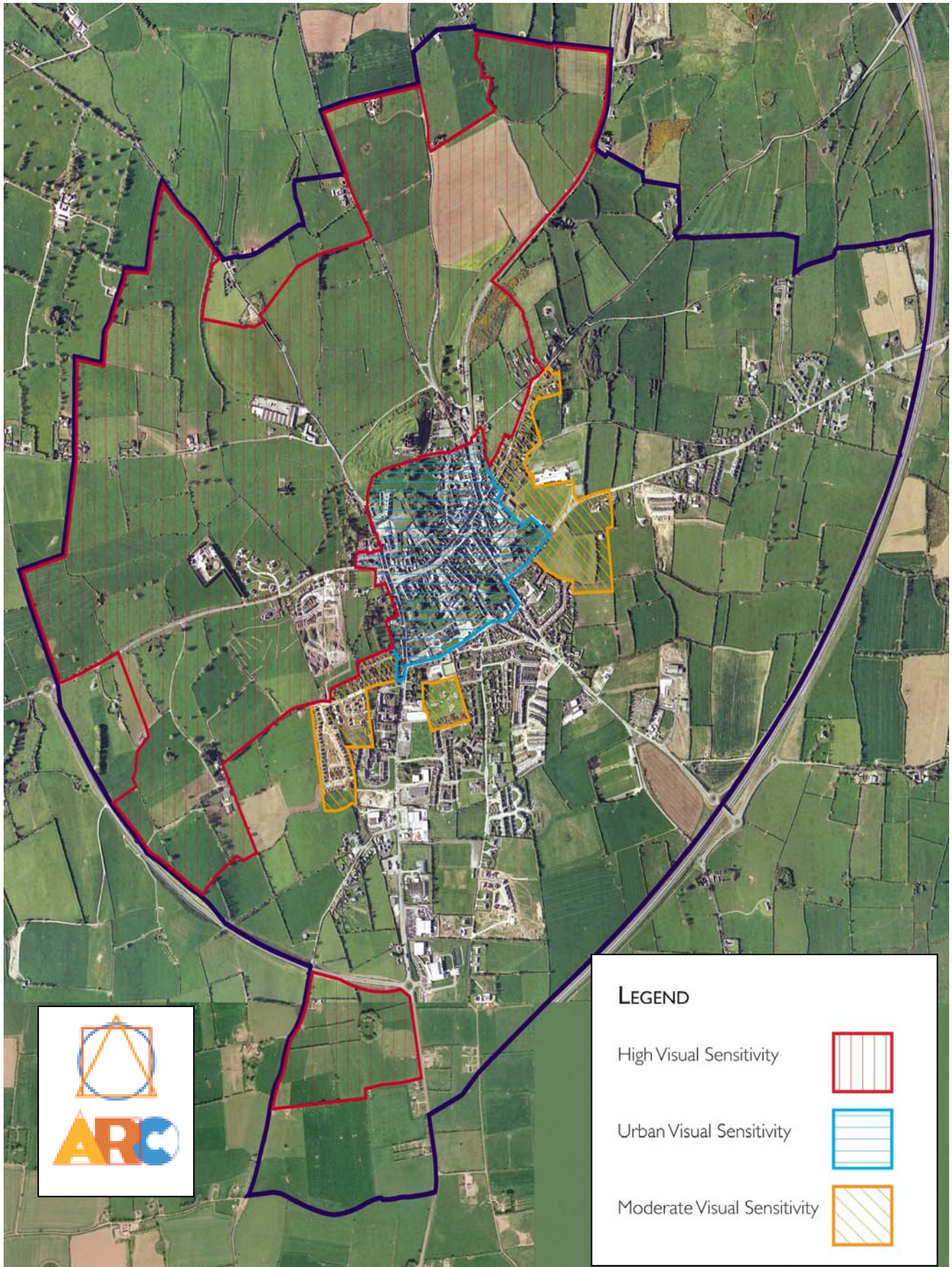


Figure 3.1 Zones of Visual Sensitivity