



APPENDIX 1

SEA ENVIRONMENTAL REPORT & APPROPRIATE ASSESSMENT

MANAGER'S REPORT ON SUBMISSIONS RECEIVED ON
DRAFT ATHY DEVELOPMENT PLAN 2012-2018



APPENDIX 1

**TO THE
SEA ENVIRONMENTAL REPORT & APPROPRIATE ASSESSMENT**

OF THE

**DRAFT ATHY TOWN DEVELOPMENT PLAN
2012-2018**

RESPONSE TO RELEVANT SUBMISSIONS & UPDATES ARISING

for: Athy Town Council
Rathstewart
Athy
County Kildare



by: CAAS Ltd.
2nd Floor, The Courtyard
25 Great Strand Street
Dublin 1



JULY 2011

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1 Introduction

This document responds to relevant submissions which were made during the 1st period of public display of the draft Athy Town Development Plan 2012-2018 and accompanying Strategic Environmental Assessment (SEA) Environmental Report (ER) and Draft Appropriate Assessment (AA) Screening Report. This Addendum provides responses to submissions or parts of submissions which relate to the ER and AA.

It is noted that consequent changes are not made to the original ER or Draft AA at this stage; this Addendum forms part of the documentation of the ongoing SEA, AA and Plan-making processes. It supplements and should be read in conjunction with the original ER and Draft AA.

Proposed Amendments to the Draft Plan will be evaluated for their likely significant environmental consequences in a second Addendum (Addendum II) to the SEA ER which will be placed on public display alongside the Proposed Amendments.

On adoption of the Plan the findings of this Addendum will be used to update the ER and AA. The ER and AA documents will also be amended to take account of the Elected Members' decisions with regard to the Manager's Recommendations and amendments to the Draft Plan and they will be made available to the public alongside the adopted Plan.

2 Responses to Submissions on the Environmental Report and Appropriate Assessment and Consequent Updates

Note that *italicised text* presents parts of the submissions that are relevant to the SEA ER and/or AA.

2.1 Submission No. 4: Dublin and Mid-East Regional Authorities

2.1.1 Observations on the Draft Athy Town Development Plan 2012-2018

KCC

2.1.2 Growth Strategy for Athy Town

Of the four alternative scenarios to accommodate future growth and development of the town, the Strategic Environmental Assessment (SEA) indicates that Scenario 4 'Consolidation and Limited Expansion around the Existing Development Envelope' is deemed to have been considered as the most favourable in terms of achieving a good balance between potential environmental impacts and conformance with relevant higher level planning objectives including the Draft County Development Plan 2011-2017. It is also considered, by the Regional Authorities for the GDA, that alternative development scenario four is the most conducive to support the spatial, environmental and social policies and recommendations of the Regional Planning Guidelines.

The Draft Plan appears to include an amalgamation of all of the above four scenarios, as the land use zoning map suggests future development can be accommodated to the west, east and periphery of the town core. This approach is also considered to be at variance with many of the policies contained within the Draft Plan itself, and in particular the aim of the core strategy which seeks:

"To respond in a coherent sustainable spatial manner to the development of Athy providing a more focused approach to planning for future development. The core strategy seeks to promote a more consolidated and compact urban form; to create and promote new employment opportunities; to create sustainable and integrated communities while balancing the protection of the natural and built heritage with sustainable and appropriate development" (Draft Athy Development Plan, page 14).

The SEA flags up a number of potential impacts from the approach being taken in the Draft Plan, which would not be easily mitigated or would require significant investment for mitigation. Some of the issues raised by the SEA includes:

- Dilution of the consolidation of the town centre and limited brownfield development;*
- Unsustainable modes of transport, high car dependency and travel related emission to air;*
- Potential conflicts on water resources and requirements for much greater investments in infrastructure provisions such as waste water treatment facilities and drinking water supply;*
- Increases in flood risk and associated potential impacts upon human health; and,*
- Potential conflicts with ecological connectivity including that of the Grand Canal and River Barrow cSAC.*

In light of the above issues, the Strategic Environmental Objectives (SEO) table at section 8.6 would require amendment to reflect the 'probable conflict with status of SEO unlikely to be mitigated' consequent of the chosen 'amalgamated' growth strategy- in particular the section relating to the core strategy. Notwithstanding, it is recommended the Local Authority review the growth strategy options to ensure the most compatible option is considered and included to support the Regional Planning Guidelines and to mitigate any possible conflicts with relevant aims and policies contained within the Draft Athy Development Plan.

Response:

The Alternative Scenario for the Draft Development Plan which was chosen to be developed for the Draft Development Plan by the plan-making team and which was submitted to the Elected Members under Section 11 of the Planning and Development Acts 2000-2010 was Scenario 4 (*Consolidation and Limited Expansion around Existing Development Envelope*) – this Scenario would achieve a good balance between potential environmental impact and conformance with relevant higher level planning objectives including the Draft County Development Plan 2011-2017.

The Draft Development Plan which was chosen by the Elected Members to be placed on public display is a mix of parts of all 4 Alternative Scenarios, providing for expansion of the town in eastern areas, in western areas, at peripheral greenfield sites and at areas around the existing development envelope. The Draft Development Plan which was submitted to the Elected Members provided for the rezoning of approx. 130 hectares of land from that which is zoned in the current 2006-2012 Plan. The Elected Members decided against the rezoning these lands by the Draft Plan to be placed on public display.

Evaluations of both Alternative Scenario 4 and of the Draft Development Plan chosen by the Elected Members to be placed on public display are detailed in Section 7 of the ER.

Mitigation measures to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing the Development Plan are detailed in Section 9 of the ER. In order to comply with some of these measures significant investment will be required and probable conflicts with environmental components - including those arising from the Core Strategy - could occur, especially in the absence of such measures.

Updates to ER or AA Arising:

To give further consideration to the description of conflicts identified in Section 8.

2.1.3 Core Strategy

KCC

2.1.4 Flood Risk

KCC

2.1.5 Environmental Considerations

a) It is important that the Development Plan policies and planned or proposed projects comply with the requirements and obligations of the Strategic Environmental Assessment Directive, Habitats Directives, Water Framework Directive and Flood Directive. In particular those plans and projects which have the potential to affect the pNHA of the Grand Canal and cSAC of the River Barrow should be carefully assessed. The SEA report carried out in conjunction with the Draft Development Plan is considered to be comprehensive. It may however be useful to highlight how the SEA process affected the policies during the plan making process by identifying those which were new additions, or where wording of policies were amended/revised to take account of SEA impacts.

b) In light of the future potential impact on Natura 2000 sites, NHO 7 states: "To request NPWS to prioritise the preparation of Management Plans for Natura 2000 sites which are located in the vicinity of the Plan area" is welcomed. The considerable time lag of 6 years for Article 17 reports and also for Corine land use data is currently unavoidable but may render insufficient the monitoring potential impact on Natura 2000 site(s). It may therefore be useful to consider River Basin Management data as a potential monitoring indicator for the River Barrow in this instance.

c) For policy impacts which are likely to have a probable conflict with the status of SEOs, the effect of which cannot be easily mitigated, it is advisable that the duration and type of impact is indicated, i.e., permanent, temporary (less than one year), short term (1-6 years), cumulative impacts etc.

Response:

a) Appendix II to the SEA Scoping Report included 35 suggestions for policies and objectives to be integrated into the Plan. All of these suggestions were integrated into the Draft Plan through individual or multiple plan provisions and some have been included verbatim. The individual/multiple plan provisions are identified in Section 9 of the ER. The SEA process did not result in the rewording of Plan provisions however the AA did. Reworded provisions on foot of the AA are identified in Section 9 of the ER.

b) River Basin Management data could be a source of information for biodiversity indicators.

c) Additional information can be added to these interactions in Section 7.5 of the ER however there are uncertainties in determining the nature of the interaction.

Updates to ER or AA Arising:

a) To add the following text to Section 9 of the ER:

Appendix II to the SEA Scoping Report included 35 suggestions for policies and objectives to be integrated into the Plan. All of these suggestions were integrated into the Draft Plan through individual or multiple plan provisions and some have been included verbatim. The individual/multiple plan provisions are identified in this section.

b) To add the following source for biodiversity to Table 10.1 in the ER:

River Basin Management Data.

c) To add the following information to 'probable conflict' interactions in Section 7.5 of the ER:

| Probable Conflict - unlikely to be mitigated | Positive or negative effects | Cumulative | Short, Medium or Long term | Temporary or Permanent |
|--|-------------------------------------|--|--|--|
| Car dependency, travel related greenhouse gas emissions, brownfield development | Negative | Yes as a result of factors including piecemeal development over a large extent of zoned lands, some of which are located in peripheral areas | All | Permanent |
| Ecological connectivity and non-designated habitats | Negative | As above | All | Permanent |
| Provision of appropriate water Services and interaction with water resources, drinking water and human health (in the absence of significant extra investment) | Negative | As above | All (in the absence of significant extra investment) | Permanent (in the absence of significant extra investment) |
| Conflict with minimisation of flood risk | Negative | As above | All | Permanent |

2.1.6 Heritage and Biodiversity

KCC

2.2 Submission No. 17: Environmental Protection Agency

2.2.1 Section 1 Integration of Environmental Considerations in the Land Use Plans

Earlier points KCC

2.2.1.1 Drinking Water/Water Supply

The SEA and Plan making processes should address drinking water supply capacity, leakage and quality in the Plan area. Future predicted increases in population and demand should be taken into consideration in the context of current drinking water supply and future requirements.

Response:

Section 3.6.2 of the ER considers relevant information on drinking water supply and quality and the assessment of the likely significant effects of implementing the Plan contained in Sections 7 and 8 consider drinking water supply and quality as key criteria (Strategic Environmental Objective). Various aspects of water services will be considered during the preparation of a Water Services Strategic Plan (Policy WS3), including leakage.

Updates to ER or AA Arising:

Later points KCC

2.2.2 Section 2 Environmental Report

2.2.2.1 Introduction

The inclusion in Section 3.10 Overlay Mapping of Environmental Sensitivities showing the overlaying of environmental sensitivities (Figure 3.35) is welcomed. It should, however, be ensured that in the more sensitive areas, development proposed in these areas is managed appropriately and that mitigation measures are sufficiently robust.

There is a clear integration of environmental considerations into the Plan, as seen from the assessment of Plan Policies against the SEA Environmental Report Strategic Environmental Objectives which is also noted and acknowledged.

It is noted that in Section 7.5 the draft Plan provides for the dezoning of approx. 130 ha of land, however the Elected Members decided against the dezoning of these lands. It should be ensured that the Plan is consistent with the South East Regional Planning Guidelines 2010-2022 and that a phased approach to development of these zoned lands is implemented to ensure critical service infrastructure provision is adequate to meet proposed development which may arise in implementing the Plan.

It should also be ensured that the recommendations of the SFRA carried out are incorporated into the Plan, and that in implementing the Plan, the requirements of the Flood Risk Management Guidelines (DoEHLG / OPW, 2009) are fully taken into account as appropriate.

Response:

The points are noted.

Updates to ER or AA Arising:

None.

2.2.2.2 Environmental Objectives

For the Environmental Protection Objectives, consideration should be given to the development of additional relevant Environmental Objectives and associated Targets and Indicators for assessing environmental impact, including:

- Sustainable use of natural resources
- Energy conservation
- Water conservation

Consideration should be given to amending SEO B1 or B2 to also include undesignated and nationally designated sites.

Response:

These issues are covered by other directly and/or indirectly by SEOs B1, B2, HH1, S1, W1, W2, W3, M1, M2, C1, C2 and L1. Undesignated and nationally designated sites have been integrated into SEO B2 (as updated per Section 2.3.1 - SEO B2: To ensure compliance with Article 10 of the Habitats Directive with regard to the protection of corridors, stepping stones and contiguous areas of habitat⁸ which are important at Town and environs level for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species and to protect protected species).

Updates to ER or AA Arising:

None.

2.2.2.3 Assessment of Environmental Effects

It should be ensured that the full range of environmental effects of the implementation of the Plan, as set out in the SEA Directive and Regulations, i.e. "secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects" have been assessed and documented.

The use of a table to summarise the assessment of environmental effects should be considered.

In particular you are referred to the potential for cumulative effects in combination with other relevant Plans/ Programmes and Projects.

Response:

As per Section 8.2 of the ER, the effects identified within the ER include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

Table 11.1 in the ER summarises likely significant effects (if unmitigated).

Section 8.4 identifies planning and sectoral policies and objectives which have been used in the assessment when considering potential cumulative and indirect conflicts and effects.

Updates to ER or AA Arising:

None.

⁸ Important corridors, stepping stones and contiguous areas of habitat include the River Barrow and the Grand Canal. It is recommended that important corridors, stepping stones and contiguous areas of habitat are identified as part of the monitoring programme and that time resources are spent in the monitoring of these rather than in the monitoring of corridors or areas of habitat which are not important at Town and environs level.

2.2.2.4 Mitigation Measures

Mitigation measures proposed should be directly linked to the specific relevant significant effects identified in the Environmental Report. There would be merits in providing a summary table outlining how each significant effect is linked directly to relevant mitigation measure(s), monitoring measure(s) and, where appropriate a specific Policy or Objective in the Plan.

Section 9.3 of the Environmental Report highlights the mitigation measures to be proposed through addition of Policies and Objectives which is acknowledged. It should however be ensured that relevant Policies/Objectives are included in the Plan to reflect these mitigation measures.

Response:

Table 11.1 in the ER is a summary table outlining how likely significant effects (if unmitigated) are linked to relevant mitigation measure(s) - which have been integrated into the Plan - and indicator(s) which will be used for monitoring.

The mitigation measures referred to - those identified in Section 9 of the ER - have already been integrated into the Draft Plan.

Updates to ER or AA Arising:

None.

2.2.2.5 Monitoring Measures

a) Consideration should be given to the following:

- The addition of appropriate corrective action thresholds for unauthorised development, illegal waste activity and water pollution incidents not involving oil spills.*
- Monitoring of both positive and negative effects, where they occur.*
- Inclusion of the on-going review of environmental targets and indicators in the monitoring programme. Responsibility for this role should be clearly defined.*

b) The Monitoring Programme should be flexible to take account of the various stages of the Plan and should be able to deal with specific environmental issues as they arise. The programme must be able to deal with the possibility of cumulative effects.

c) While the monitoring programme sets out the various sources of data, the actual departments responsible for collecting, collating and analysing the data should be identified as soon as possible after the Plan has been adopted.

d) The Monitoring Programme should include information on how the monitoring proposed will allow unforeseen adverse effects to be identified and responded to as appropriate. Who has responsibility for this? What will trigger appropriate remedial action?

Response:

a) In compliance with the SEA Directive, Section 10 of the ER contains proposals for monitoring the likely significant effects - including positive and negative effects - of implementing the Development Plan. It is not considered necessary to add to these measures. The report will be updated to note that indicators and targets will be reviewed during the preparation of the preliminary monitoring evaluation report.

b) The proposals for monitoring are flexible and will monitor the likely significant effects - including cumulative effects - of implementing the Development Plan.

c) This is noted.

d) In compliance with the SEA Directive, Section 10 of the ER contains proposals for monitoring the likely significant effects of implementing the Development Plan. The ER recommends that a

Steering Committee be established within the Council to oversee the monitoring process. Remedial action will be considered on a case by case basis taking into account changes in indicator values, causes and exceedances of legislative values.

Updates to ER or AA Arising:

a) To add the following sentence to Section 10.4 of the ER:

Indicators and targets will be reviewed during the preparation of the preliminary monitoring evaluation report.

b) None.

c) None.

d) None.

2.2.2.6 Section 2 SEA Methodology

Consideration should be given to amending Paragraph 4 in Section 2.7 - The SEA Environmental Report to refer to S.I. No. 436 of 2004 instead of S.I. No. 435 of 2004.

Response:

Noted.

Updates to ER or AA Arising:

To update paragraph 4 in Section 2.7 of the Environmental Report as follows:

The Environmental Report is required to contain the information specified in Schedule 2 of the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI No. 4356 of 2004) (see Table 2.1).

2.2.2.7 Section 3 Athy Town Environmental Baseline

Section 3.4.4 - Existing Environmental Problems refer to certain parts of the town as not being not within the catchment of the wastewater treatment plant and utilise septic tanks / waste water treatment & disposal systems. It should be ensured that the EPA Code of Practice Wastewater treatment and Disposal Systems Serving Single Houses (p.e ≤ 10) is taken into account for any development proposed outside the areas currently served by the waste water treatment plant.

Response:

Relevant measures currently in the Plan include:

| |
|--|
| WDO1: To improve the provision of water and drainage services in new developments and in those areas of the town where deficiencies exist. |
| WDO2: To protect, improve and conserve the town's wastewater resources. |
| WDO3: To facilitate the provision of necessary water infrastructure in a sustainable manner |

Updates to ER or AA Arising:

None.

2.2.2.8 Section 5 Context for the Town Development Plan

The inclusion of Section 5.4.10 - Athy Integrated Framework Plan for Land use and Transportation is noted. Given that the above Plan was prepared in 2004, consideration should be given to reviewing in the

context of ensuring that it is consistent with the South Regional Planning Guidelines (2010-2022) and draft Kildare County Development Plan 2011-2017.

Response:

KCC to respond

Updates to ER or AA Arising:

None.

2.2.2.9 Section 7 Evaluation of Alternative Development Scenarios for the Plan

It is noted that in Section 7.5 the draft Plan provided for the dezoning of approx. 130 ha of land, however the Elected Members decided against the dezoning of these lands. It should be ensured that the Plan is consistent with the Greater Dublin Area Regional Planning Guidelines 2010-2022 and that a phased approach to development is implemented to ensure critical service infrastructure provision is adequate to meet proposed development which may arise in implementing the Plan.

Consideration should be given to amending Section 7.5 under the Evaluation against SEOs (page 97) to provide summary tables for each development scenario to correctly reflect the preferred development scenario described.

Response:

Tables are provided detailing the evaluation of alternative scenarios and the selected development scenario against SEOs. It is not considered necessary to add or summarise these tables.

Updates to ER or AA Arising:

None.

2.2.2.10 Section 8 Evaluation of Draft Plan Provisions

The assessment of the draft Plan Policies against the SEA SEOs is welcomed and acknowledged.

Response:

This is noted.

Updates to ER or AA Arising:

None.

2.2.2.11 Section 9 Mitigation Measures

It should be ensured that the mitigation measures proposed in lands identified as being at risk of flooding are adequate and appropriate. It should be ensured that the requirements of the Flood Risk Management Guidelines and application of Justification tests are required in lands at risk of flooding. The promotion of water compatible land uses should be promoted in areas where flood risk has been identified in the SFRA.

Response:

This is noted.

Updates to ER or AA Arising:

None.

2.2.2.12 Section 11 SEA Summary Table

The inclusion of this Section which summarises likely significant effects, mitigation measures and indicators for monitoring is welcomed.

Response:

This is noted.

Updates to ER or AA Arising:

None.

2.2.3 Section 3 Development Plan

KCC

2.3 Submission No. 61: Department of the Environment, Heritage and Local Government

2.3.1 Nature

The Department notes that SEOs for Biodiversity and Flora and Fauna in the Environmental Report have not included protected species (as opposed to Annexed species) of flora and fauna in the wider countryside. The Department recommends that this issue be addressed.

Response:

SEOs B1 and B2 cover various aspects of biodiversity and flora and fauna. SEO B2 (To ensure compliance with Article 10 of the Habitats Directive with regard to the protection of corridors, stepping stones and contiguous areas of habitat⁹ which are important at Town and environs level for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species) covers corridors, stepping stones and contiguous areas of habitat which may include protected species. SEO B2 is to be reworded as detailed below.

Updates to ER or AA Arising:

To reword SEO B2 in the ER as follows:

SEO B2 To ensure compliance with Article 10 of the Habitats Directive with regard to the protection of corridors, stepping stones and contiguous areas of habitat¹⁰ which are important at Town and environs level for wild fauna and flora and essential for the migration, dispersal and genetic exchange of wild species and to protect protected species.

2.3.2 Archaeological Heritage

The SEA ER contains satisfactory policies and objectives for the protection of archaeological heritage.

Response:

This is noted

⁹ Important corridors, stepping stones and contiguous areas of habitat include the River Barrow and the Grand Canal. It is recommended that important corridors, stepping stones and contiguous areas of habitat are identified as part of the monitoring programme and that time resources are spent in the monitoring of these rather than in the monitoring of corridors or areas of habitat which are not important at Town and environs level.

¹⁰ Important corridors, stepping stones and contiguous areas of habitat include the River Barrow and the Grand Canal. It is recommended that important corridors, stepping stones and contiguous areas of habitat are identified as part of the monitoring programme and that time resources are spent in the monitoring of these rather than in the monitoring of corridors or areas of habitat which are not important at Town and environs level.

Updates to ER or AA Arising:

None.



APPENDIX 2

REVISED MAPS

MANAGER'S REPORT ON SUBMISSIONS RECEIVED ON
DRAFT ATHY DEVELOPMENT PLAN 2012-2018





Athy Town Council

Draft Athy Town Development Plan 2012-2018

Legend



Core Retail Area



Core Retail Area

Date: Aug 2011

Map Ref: 6.1

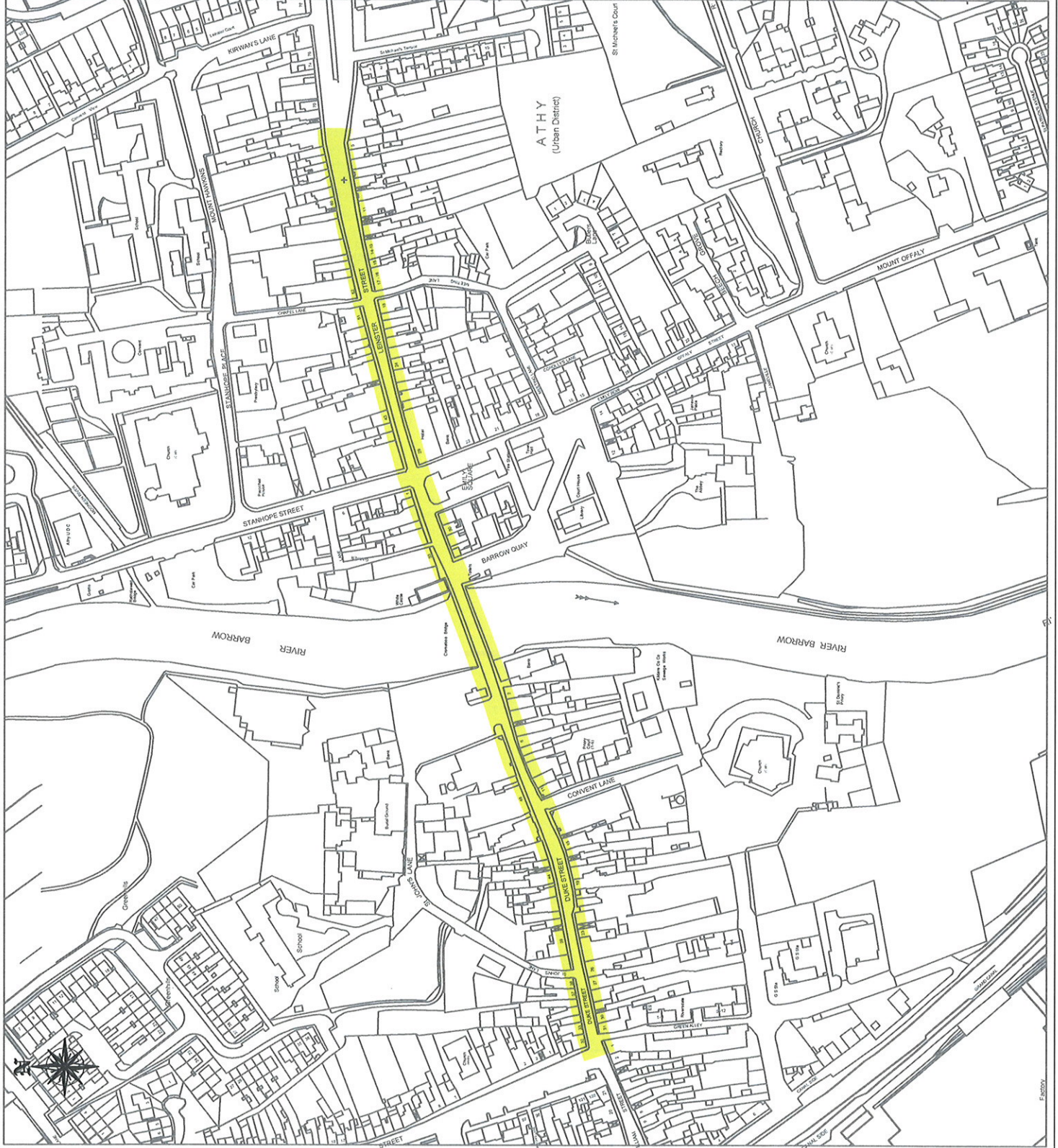
Scale: N.T.S.

Drg No: 200/10/523

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Drawn By DMcN

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE WRITTEN STATEMENT





Athy Town Council

Draft Athy Town Development Plan 2012-2018

Legend

- Grand Canal and River Barrow
- NHA Grand Canal
- SAC River Barrow
- Athy Town Boundary
- Existing trees to be preserved
- Zone of Archaeological Potential
- Views & Prospects to be Preserved (Related to Water Corridor)
- Record of Monuments and Places (RMP) (National Site or Monument)



Natural Heritage including Views & Prospects

Date: Aug 2011

Map Ref: 13.1

Scale: N.T.C.

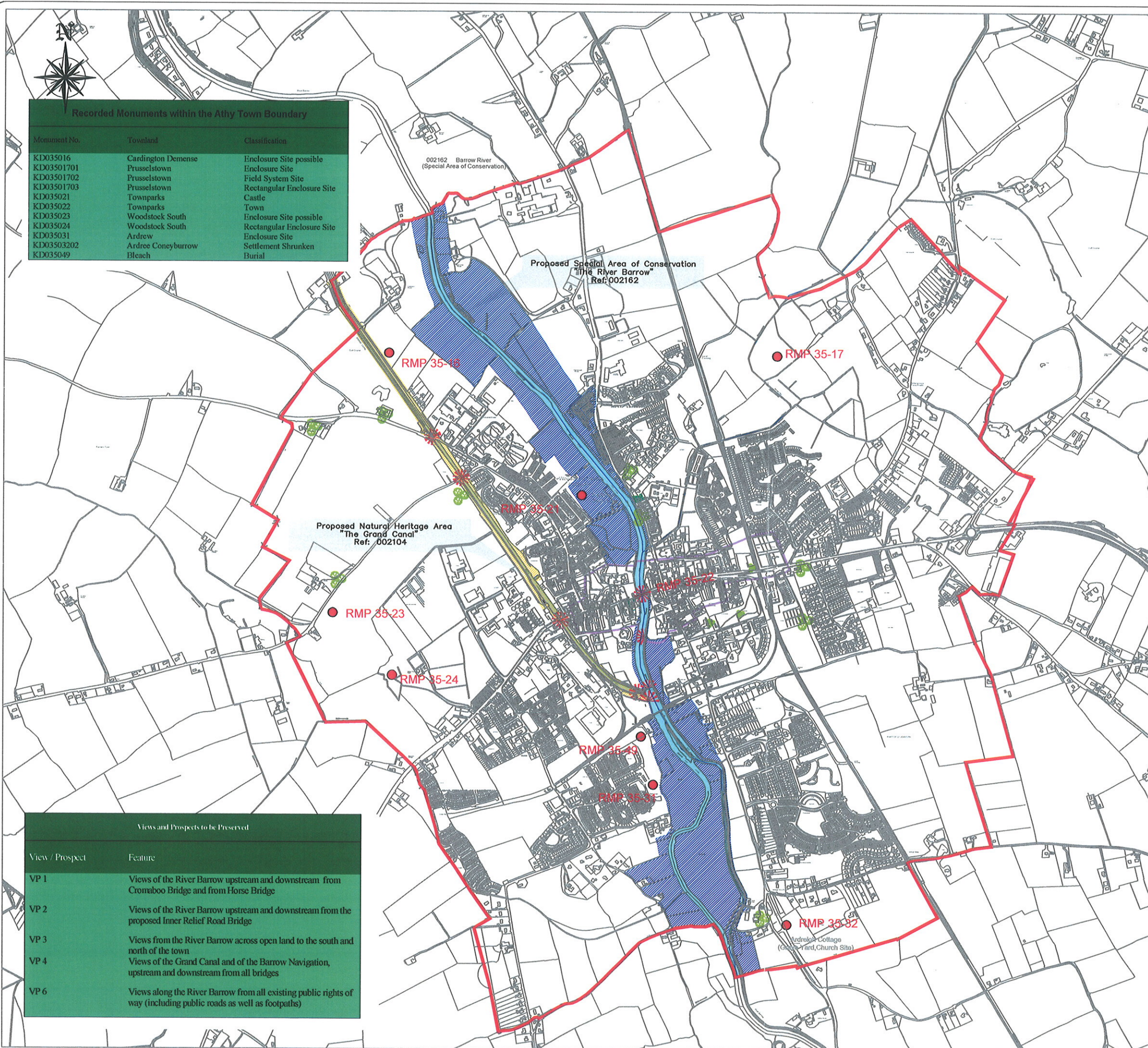
Drg No: 200/10/509

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Drawn By DMcN

THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE WRITTEN STATEMENT

| Recorded Monuments within the Athy Town Boundary | | |
|--|---------------------|----------------------------|
| Monument No. | Townland | Classification |
| KD035016 | Cardington Demense | Enclosure Site possible |
| KD03501701 | Prusselstown | Enclosure Site |
| KD03501702 | Prusselstown | Field System Site |
| KD03501703 | Prusselstown | Rectangular Enclosure Site |
| KD035021 | Townparks | Castle |
| KD035022 | Townparks | Town |
| KD035023 | Woodstock South | Enclosure Site possible |
| KD035024 | Woodstock South | Rectangular Enclosure Site |
| KD035031 | Ardrew | Enclosure Site |
| KD03503202 | Ardrewe Coneyburrow | Settlement Shrunken |
| KD035049 | Bleach | Burial |



| Views and Prospects to be Preserved | |
|-------------------------------------|---|
| View / Prospect | Feature |
| VP 1 | Views of the River Barrow upstream and downstream from Cromaboo Bridge and from Horse Bridge |
| VP 2 | Views of the River Barrow upstream and downstream from the proposed Inner Relief Road Bridge |
| VP 3 | Views from the River Barrow across open land to the south and north of the town |
| VP 4 | Views of the Grand Canal and of the Barrow Navigation, upstream and downstream from all bridges |
| VP 6 | Views along the River Barrow from all existing public rights of way (including public roads as well as footpaths) |