



**Comhairle Contae  
Dhún na nGall**  
Donegal County Council

**SEA STATEMENT**

**ON THE**

**STRATEGIC ENVIRONMENTAL ASSESSMENT**

**OF THE**

**BUNCRANA AND ENVIRONS DEVELOPMENT PLAN  
2014-2020**

September 2014

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## **Section 1: Introduction**

### **1.1 Terms of Reference**

This is the Strategic Environmental Assessment (SEA) Statement of the Buncrana & Environs Development Plan 2014-2020.

### **1.2 SEA Definition**

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

### **1.3 Legislative Context**

Directive 2001/42/EC of the European Parliament and of the Council, of 27 June 2001, on the assessment of the effects of certain plans and programmes on the environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes, which includes land use plans.

The European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (SI No. 435 of 2004), and, the Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004) transpose the European Strategic Environmental Assessment (SEA) Directive 2001/42/EC into Irish Law. Both sets of Regulations became operational on 21 July 2004. The Department of the Environment, Heritage and Local Government also issued guidelines in November 2004 on the implementation of the SEA Directive (2001/42/EC) entitled 'Assessment of the Effects of Certain Plans and Programmes on the Environment'.

The SEA Directive and the instruments transposing it into Irish Law require that, after the adoption of a plan or programme, the plan or programme making authority is required to make a Statement available to the public, the competent environmental authorities and, where relevant, neighbouring countries. This Statement is referred to as an SEA Statement.

### **1.4 Content of the SEA Statement**

The SEA Statement is required to include information summarising:

- (a) How environmental considerations have been integrated into the Buncrana & Environs Development Plan,
- (b) How
  - the environmental report,
  - submissions and observations made to the planning authority on the proposed Plan and Environmental Report, and

- any transboundary consultations, have been taken into account during the preparation of the Buncrana & Environs Development Plan,
- (c) the reasons for choosing the Buncrana & Environs Development Plan, as adopted, in the light of the other reasonable alternatives dealt with, and
- (d) the measures decided upon to monitor the significant environmental effects of implementation of the Plan.

## **1.5 Implications of SEA for the Buncrana & Environs Development Plan 2014-2020**

As a result of the aforementioned legislation, the Buncrana & Environs Development Plan 2014-2020 was required to undergo SEA. This process included pre-scoping and formal scoping with stakeholders before the findings of the SEA was expressed in an Environmental Report which accompanied the Draft Buncrana & Environs Development Plan 2014-2020, which was on public display from the 2<sup>nd</sup> August 2013 to 14<sup>th</sup> October 2013. Following consideration of the submissions and observations received during that public consultation process, it was decided to amend the Draft Plan. The amendments included "Material Alterations" that were subjected to further SEA to take account of changes being made to the Draft Plan. The findings of that SEA was presented in a report that accompanied the proposed Material Alterations that were on public display between 5<sup>th</sup> May 2014 to 4<sup>th</sup> June 2014. A report on the submissions and observations made in respect of the proposed Material Alterations and the SEA was presented in a Chief Executive's Report to the Members of Donegal County Council. Having considered the proposed Material Alterations and the SEA Report, it was resolved by Members to make the Buncrana & Environs Development Plan 2014-2020 at their Council meeting on the 28<sup>th</sup> July 2014. Upon adoption of the Buncrana & Environs Development Plan 2014-2020 the original Environmental Report was updated, using the Environmental Report on the Material Alterations, to form a final Environmental Report, which is available alongside the adopted Plan. At each stage of the process the Elected Members took into account the findings of the Environmental Report on the Draft Plan and the subsequent Strategic Environmental Assessment of the proposed Material Alterations to the Draft Buncrana & Environs Development Plan 2014-2020.

## Section 2: How Environmental Considerations were integrated into the Plan

### 2.1 Key Steps in the SEA Process

The preparation of the Draft Plan, Strategic Environmental Assessment and Appropriate Assessment has been an iterative process and this is evident from the integration of the three strands at all key stages in the process, as set out in the following table.

**Table 1: Key Steps in SEA, AA and Plan Preparation**

Key Steps	Dates
Preliminary Scoping SEA report	March 2012
Pre-Draft Consultation/Scoping Report for SEA/Appropriate Assessment	29 <sup>th</sup> March to 24 <sup>th</sup> May 2012
Manager's Report on Pre-Draft Consultation/SEA/Appropriate Assessment	24 <sup>th</sup> May to 19 <sup>th</sup> July 2012
Draft Plan – Public Consultation on Draft Plan/Environmental Report/Appropriate Assessment	2 <sup>nd</sup> August to 14 <sup>th</sup> October 2013
Manager's Report on Draft Plan/Environmental Report/Appropriate Assessment	Issued to Members in February 2014
Council Meeting – Resolved to make plan, subject to proposed Material Alterations.	12 <sup>th</sup> March and 31 <sup>st</sup> March 2014
Public Consultation on Material Alterations/Environmental Report/Appropriate Assessment	5 <sup>th</sup> May to 4 <sup>th</sup> June 2014
Manager's Report on Material Alterations/Environmental Report/Appropriate Assessment	5 <sup>th</sup> June to 30 <sup>th</sup> June 2014
Council Meeting (Resolved to make Plan)	28 <sup>th</sup> July 2014

### 2.2 Consultations

As part of the scoping exercise a pre- scoping report and a finalised scoping report were prepared and circulated to the following statutory bodies and other public bodies:

- Environmental protection Agency (EPA)
- Department of the Environment, Heritage & Local Government (DEHLG)
- Department of Communications, Energy & Natural Resources (DECNR)
- Department of Arts, Culture & the Gaeltacht,

- Department of Agriculture, Fisheries & Food
- Loughs Agency, Derry
- Leitrim County Council
- Dept. Of Environment Northern Ireland (informal)

Submissions were received in response to the scoping paper from two statutory consultees, namely the EPA and Department of Arts, Culture and the Gaeltacht. The Scoping Report for SEA was then presented as part of the Pre-Draft Plan consultation that was undertaken between the 29th March 2012 and 24th May 2012. The submissions received helped shape the Environmental Report that informed the Draft Plan and both the Environmental Report and Draft Plan were made available during the public consultation period between 2<sup>nd</sup> August 2013 to 14th October 2013. The submissions to the Draft Plan and the Environmental Report were considered and changes were proposed that included non-material and material alterations to the Draft Development Plan. A Strategic Environmental Assessment of the proposed Material Alterations to the Draft Plan was made and expressed in an environmental report on the proposed changes, which was made available during the final public consultation period on the proposed Material Alterations that took place from 5<sup>th</sup> May 2014- 4<sup>th</sup> June 2014. All submissions were considered before the plan was finally adopted on 28<sup>th</sup> July 2014. Thus, all submissions were taken into consideration at each stage of decision making.

Informal consultation between the Planning Authority and the Department of the Environment in Northern Ireland has been carried out during the review of the development plan and it was considered that formal Transboundary consultation is not required, as the implementation of the Plan will not have significant impacts on the environment of a member state.

## 2.3 Environmental Vulnerabilities

Environmental considerations were integrated into the Draft Plan before it was placed on public display for the first time. Environmental vulnerabilities were mapped in order to identify which areas of the town were most sensitive to development and would be most likely to suffer adverse effects if growth was to be accommodated in those areas without mitigation. The environmental vulnerabilities that informed the Plan preparation process included the following sites and considerations:

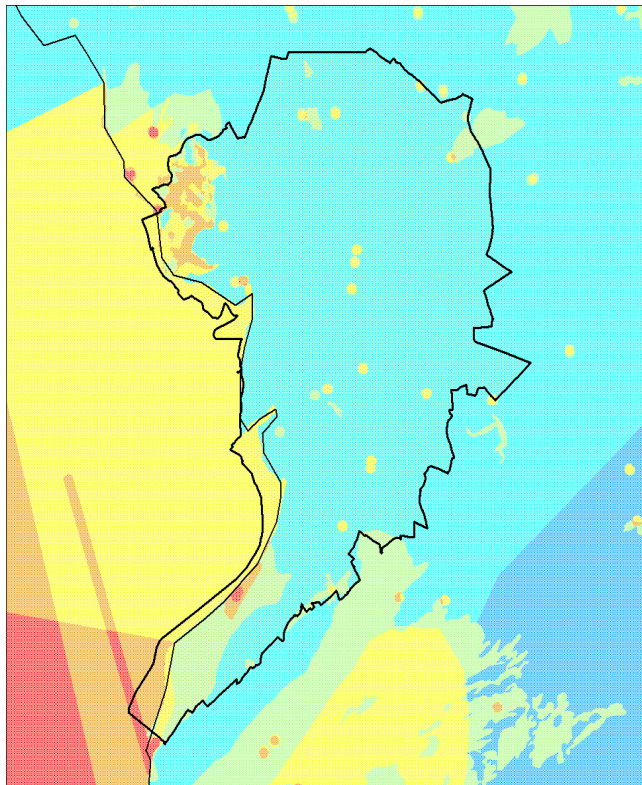
- Natura 2000 (Special Areas of Conservation (SAC's) and Special Protection Areas (SPAs),
- Natural Heritage Area (NHA) and proposed Natural Heritage Area (pNHA),
- Broadleafed woodland,
- Record of Protected Structures (RPS),
- Sites and Monuments Record and Archaeological monuments,
- Especially High Scenic Amenity (EHSA) and Views and prospects,
- Geological sites,
- Bathing Water Quality, Blue Flag Beaches and Green Coast Awards,
- Aquifers, Source Protection Areas & Abstraction Points,
- Flood Points and Benefiting lands,
- Unsewered Properties,
- Walking routes,
- IPPC licences and EPA Waste licences,
- North West International River Basin District (NWIRBD coastal, Transitional, lakes and river, and groundwater bodies at Risk and Shellfish catchments.

Environmental Vulnerabilities within the town were identified during the gathering of baseline data for the Environmental Report and those that have the data available spatially were mapped individually

and also compiled into a 'Map of Vulnerabilities' (See Map 1). Map 1 was developed by identifying and sourcing 39 layers of environmental data which were overlaid spatially and weighted in order to show an output range of environmental vulnerability. The layering of environmental vulnerabilities and weighting applied to each layer provided for the consideration of cumulative vulnerabilities and the inter-relationships between them. This resulted in the provision of Map 1 which shows the identification of the most vulnerable areas in the town shown in red through to the lowest environmental vulnerability shown in Blue. (Note the plan area is shown as a black line).

The identification of areas of high environmental vulnerability were considered through the drafting of policies, and as a tool in identifying areas that may be subject to mitigation. The weighting system applied to each layer through the GIS system in order to arrive at a value of vulnerabilities for the town gave European Natura 2000 sites a value of 15, National, Regional & Local datasets a rating value of 10 and the 15km buffer zone around Natura 2000 sites a value of 5. There are certain limitations and an element of subjectivity to the vulnerabilities mapping developed, however the exercise was fundamental in the strategic context to assess potential conflicts of the Plan with environmental vulnerabilities.

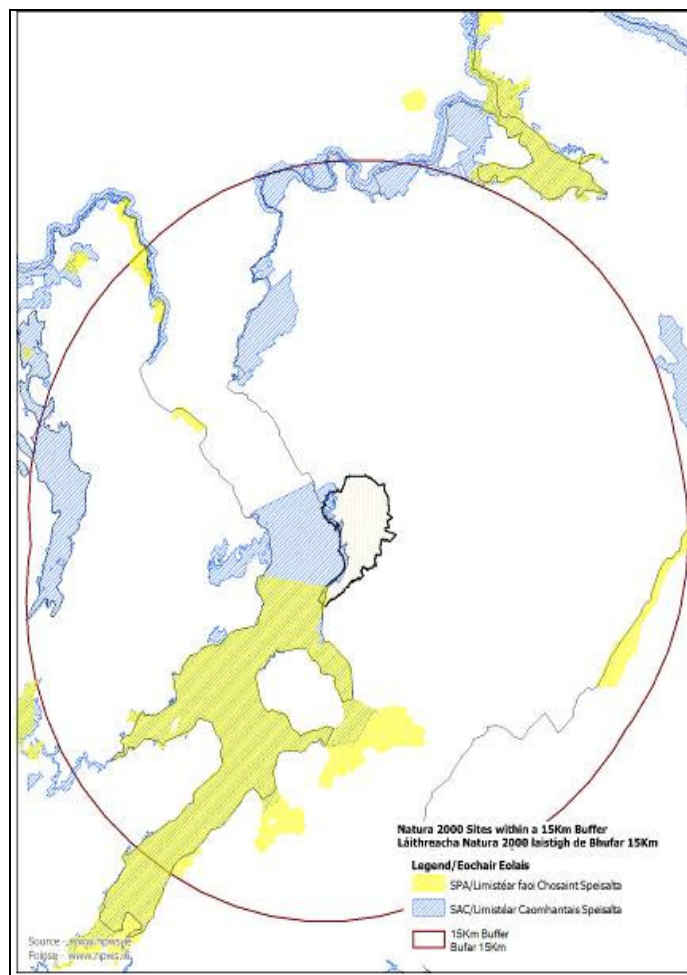
**Map 1: Vulnerability Mapping**



## 2.4 Identification and Evaluation of Alternatives

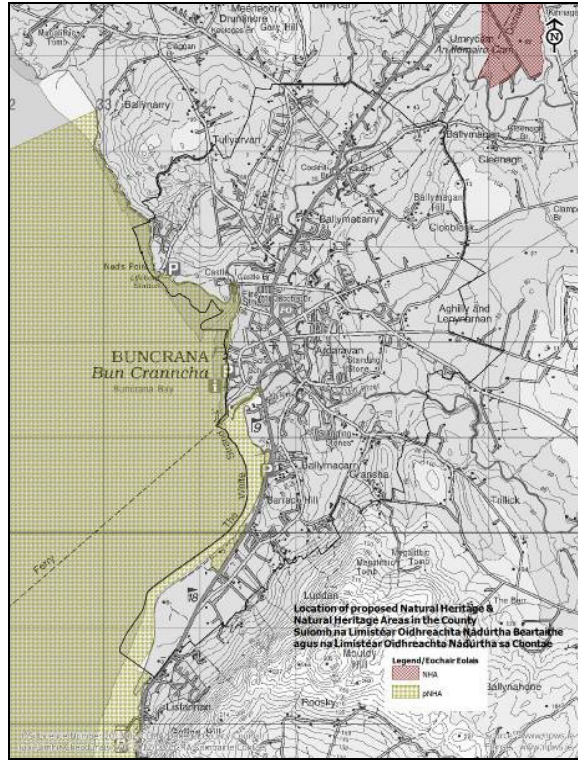
A range of potential alternative scenarios for the types of planning strategies adopted for the Development Plan were identified in the SEA process and evaluated for their likely significant environmental effects (see Section 4). The environmental sensitivities and overlay mapping shown on Maps 2-9 were used in order to predict and evaluate the environmental effects of implementing the scenarios. Communication of the findings of this evaluation helped the Plan-making team to make an informed choice as to which alternative should be considered. Mitigation measures which arose from the evaluation and which were integrated into the Plan are detailed under Section 2.6 of this report.

**Map 2: Natura 2000 sites (SACs and SPAs)**

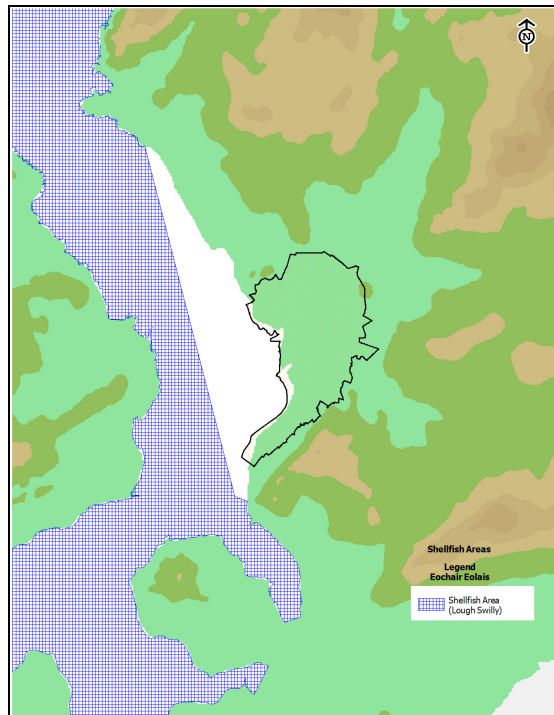




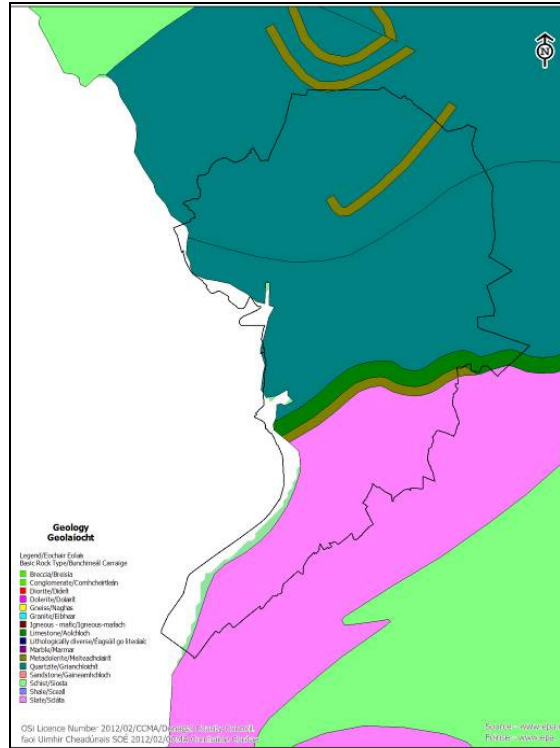
**Map 3: Existing and proposed Natural Heritage Areas**



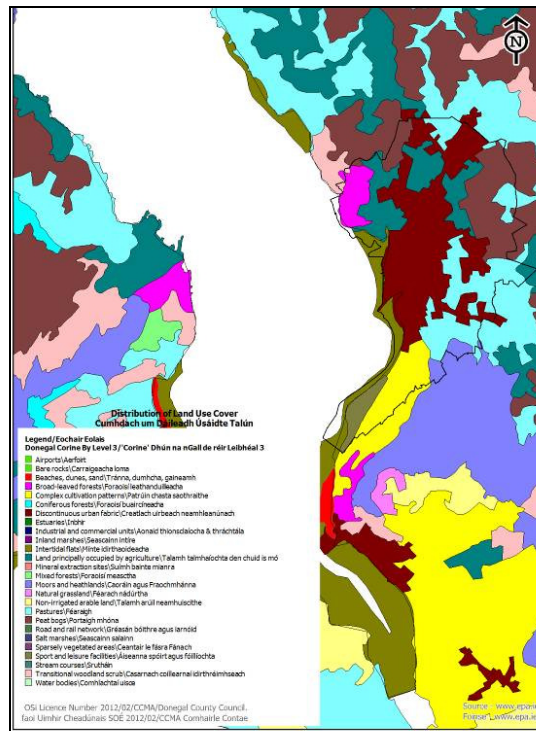
**Map 4: Designated Shellfish Waters**



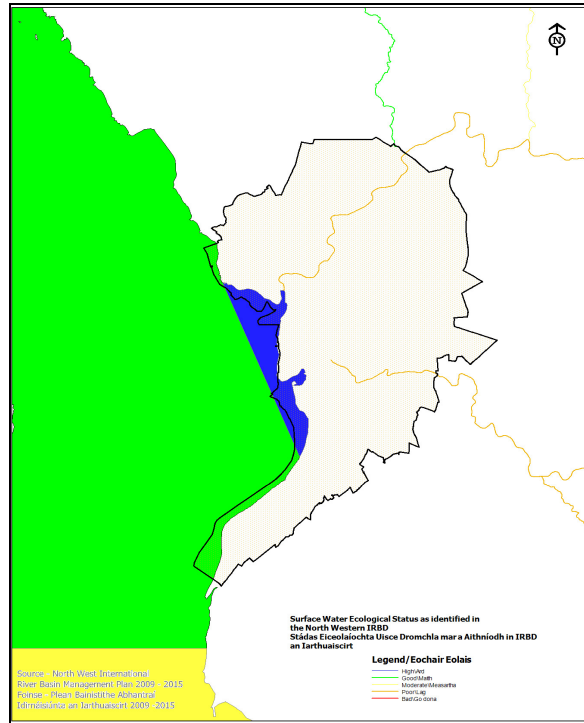
**Map 5: Geology**



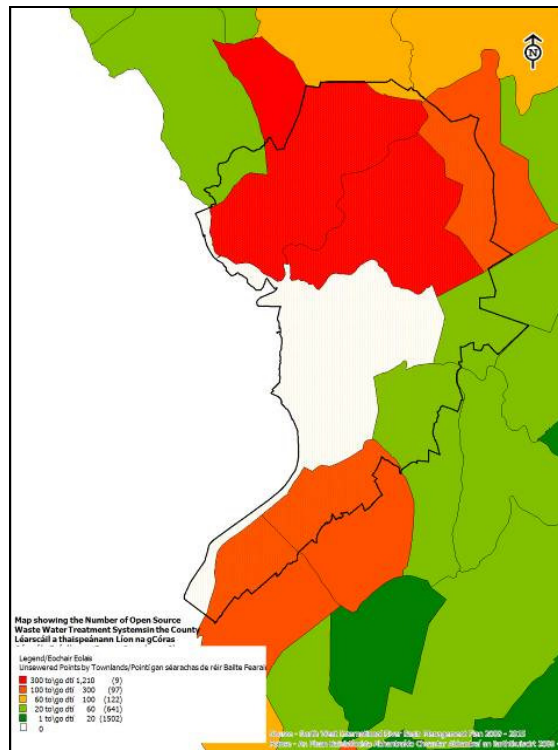
**Map 6: Distribution of land cover**



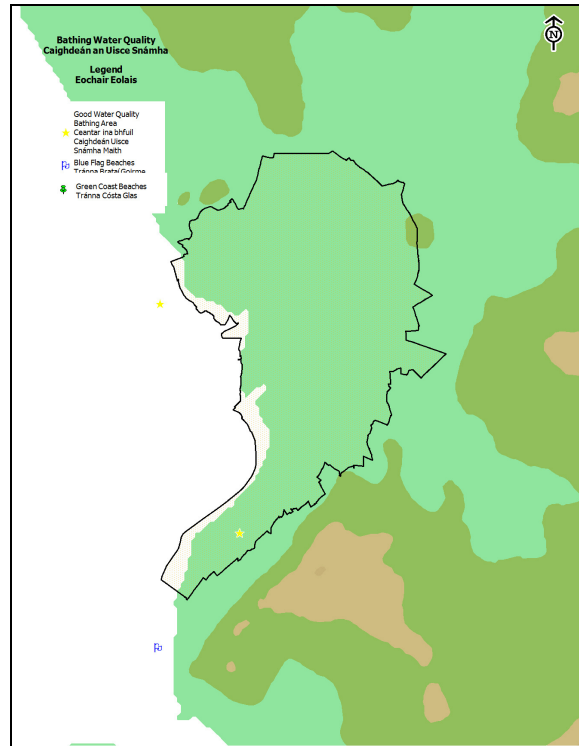
**Map 7: Surface Water Ecological Status (NWIRBD)**



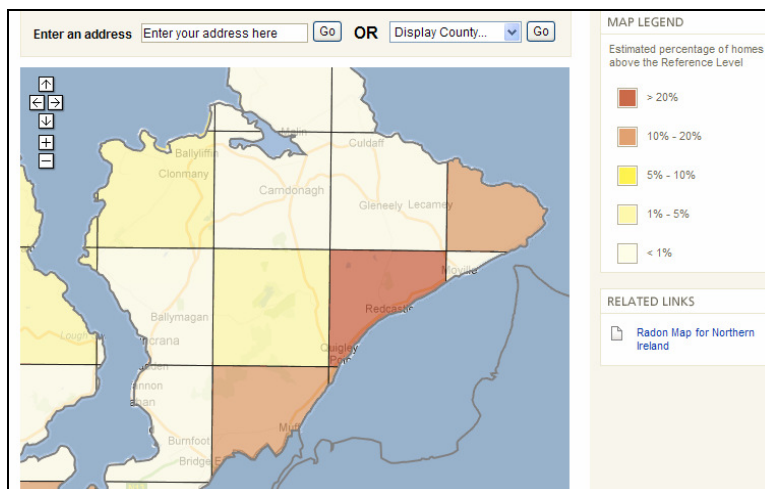
**Map 8: Location of on- site waste water treatment systems within the Plan area.**



### Map 9: Bathing Water Quality

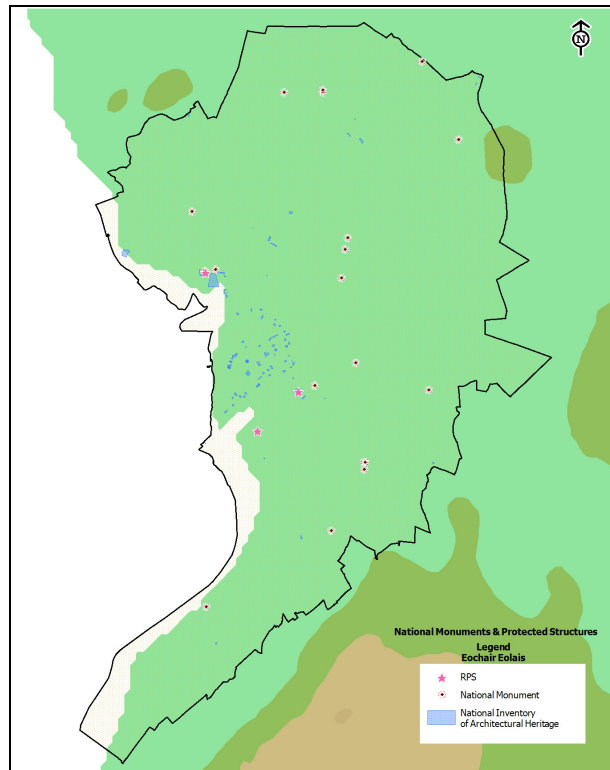


### Map 10: Radon Levels



Source: Radiological Protection Institute of Ireland. [www.rpii.ie](http://www.rpii.ie)

**Map 11:RPS, NIAH, draft NIAH, and RMPs**



## 2.5 Appropriate Assessment and Strategic Flood Risk Assessment

An Appropriate Assessment (AA) has been undertaken alongside the preparation and adoption of the Plan. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC). The requirement for Strategic Flood Risk Assessment (SFRA) is provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (DEHLG, 2009). The Office of Public Works (OPW) are the lead agency for flood risk management and are developing indicative flood maps and Catchment Flood Risk Assessment and Management Mapping (CFRAM – a catchment based study involving an assessment of the risk of flooding in a catchment and the development of a strategy for managing that risk in order to reduce adverse effects on people, property and the environment). These are due by 2015. The flood risk will be assessed in terms of its likely potential impact upon identified 'Receptors', such as, people, property, schools, hospitals, waste water treatment plants.

In the absence of this work being completed, Donegal County Council will seek to manage development within floodplains and other areas at risk from flooding in a sequential manner based on avoidance, reduction and then mitigation. There is a need to exercise the precautionary approach to development proposals within areas that have historically been known to have flooded. Accordingly, indicators to be used to assess flood risk, in advance of the CFRAMS being published, have been identified. All known flooding information that was available to the Council was utilised to inform the policies and objectives of the Plan. The preparation and adoption of the Plan, SEA & AA have taken place concurrently and the findings of the AA has informed both the Plan and the SEA.

## **2.6 Mitigation**

### **2.6.1 Introduction**

Mitigation measures are measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse impacts on the environment of implementing the Plan. Where there are significant negative effects, consideration is given in the first instance to prevent such effects or, where this is not possible for stated reasons, to lessen or offset those effects. Mitigation measures can be roughly divided into those that:

- Avoid effects;
- Reduce the magnitude or extent, probability and/or severity of effects;
- Repair effects after they have occurred, and;
- Compensate for effects, balancing out negative impacts with other positive ones.

The SEA of the Draft Plan was carried out in-house within the wider Plan drafting team. Accordingly, environmental vulnerabilities, issues and constraints were considered, in the first instance, through the plan writing process and in this regard formulated with the explicit intention of protecting the environment and avoiding potentially adverse environmental impacts. Thus mitigation measures have been integrated into the drafting of objectives and policies contained within the Plan from the outset. The findings of the SEA (and the AA and SFRA) has informed this process through the:

- Consideration of alternatives;
- Integration of environmental considerations into the zoning contained in Settlement frameworks;
- Addition of Policies and Objectives; and
- Amending Policies and Objectives contained in earlier drafts of the Plan.

### **2.6.2 Mitigation through Consideration of Alternatives**

A range of potential alternative development scenarios for the Buncrana & Environs Development Plan were identified in the process and evaluated for their likely significant environmental effects (see Section 4). The environmental effects of implementing the alternatives were predicted and evaluated. Communication of the findings of this evaluation informed the choice as to which alternative was to be adopted and an explanation of the choice was elaborated upon in the Strategic Environmental Assessment report on the proposed Material Alterations to the Draft Plan.

### **2.6.3 Mitigation by Addition of Policies and Objectives**

In order to mitigate adverse environmental effects, and comply with statutory requirements, measures recommended by statutory consultees were integrated into the Plan. In addition to these measures the Council proactively integrated a number of additional measures into the Plan which also provide for the integration of environmental considerations into the Plan and mitigation of potential effects.

The SEA process shaped the drafting of the entire Plan and each aim, policy and objective were fully assessed as outlined in Table 27 of the Environmental Report (See Appendix 2 to the Buncrana & Environs Development Plan 2014-2020). Table 2, below, outlines how the environmental issues raised throughout the SEA process was addressed in the plan through a suite of objectives, policies or otherwise. It also identifies a number of objectives and policies that had been identified as having potential conflict with the Strategic Environmental Objectives of the plan that necessitated mitigation, which has been incorporated into the plan. As stated earlier, environmental vulnerabilities, issues and constraints were considered, in the first instance, through the plan writing process and formulated with the explicit intention of protecting the environment and avoiding potentially adverse environmental impacts. Thus mitigation measures have been integrated into the drafting of objectives and policies contained within the Plan from the outset and are not accounted for in Table 2.



**Table 2: Incorporating Environmental Issues into the Plan**

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required
<b>Biodiversity, Flora and Fauna</b>		
Impact of development works	E-O-8, E-O-9, E-P-2, E-P-8, E-P-10, E-P-18, R-P-9, R-P-11, R-P-12, NH-O-1, RD-P-1, RD-P-2, RD-P-1, CEH-P-2, CEH-P-7	RD-O-1 To protect the corridors and routes and acquire the lands necessary for transportation improvement projects as identified in the Land Use Zoning Map 1 subject to the environmental, safety and other planning considerations.
Protection of watercourses and sensitive water bodies	SW-O-1, SW-P-2	
Control of invasive species		
Protection of Natura 2000 sites including certain sites within counties Sligo and Leitrim and Northern Ireland.	CS-O-5, E-P-9, E-P-12, E-P-12, R-P-5*, R-P-6*, R-P-8*, BH-P-6*, NH-O-2, NH-O-3, NH-P-1, NH-P-2, F-P-1, F-P-2*, F-P-3*	
Protection of Annex II species such as Freshwater Pearl Mussel and salmon	F-P-2*, F-P-3*, F-P-8*, F-P-9*, F-P-10*	
Ecological Networks	NH-O-6, NH-P-7, NH-P-8	
Shellfish waters	NH-P-3	NH-P-3 expanded to include reference to implementation of pollution reduction measures and to incorporate periodic review.
<b>Population and Human Health</b>		
Quality of Life	CS-O-1, CS-P-3, E-P-2, E-P-3, BH-P-7, BH-P-8, BHP-9, CEH-O-2, CEH-P-5, CEH-P-6, H-O-3, H-O-4, CH-O-1	
Population trends, distribution of CDP (RPG) Population targets ..	CS-P-5, H-P-1, H-P-3, H-P-5, H-P-6, H-P-15	
Health and its relationship to environmental issues.	E-O-9, E-P-26, E-P-27, CEH-O-1, CEH-O-3, CEH-O-4, CH-P-2	
Provision of infrastructure and community facilities	CS-O-2, CS-O-3, CS-O-4, E-O-9, RD-P-4, RD-P10, CH-P-2	
Flooding	E-P-11, E-P-14, E-P-15, E-P-16, F-O-1, F-O-2, F-O-3, F-O-4, F-O-5, F-P-4, F-P-5, F-P-6, F-P-7, F-P-8*, F-P-9*, F-P-10*	

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required
<b>Water</b>		
Impact of development works on water quality	CS-O-5, CS-O-9, E-O-6, WW-O-1	
Alignment with objectives and policies of the NWIRBD Plan.	CS-O-9, SP-1	
Wastewater, drinking water and bathing water quality.	CS-O-5, CS-O-9, E-O-6, WW-O-2, WW-P-2	
<b>Air and Climate Change</b>		
Climate Change and Air Quality	CS-O-8	
Limiting Greenhouse gas emissions and reducing dependency on fossil fuels.		
<b>Cultural Heritage</b>		
Impact of development works	CS-O-11	
Identification and protection of geological sites,	NH-P-11	
Protection of architectural and archaeological structures and sites.	CS-O-10, E-P-8, E-P-13, BH-O-1, BH-P-1, BH-P-2, BH-P-4, AH-O-1, AH-P-1, AH-P-2, AH-P-3, TC-P-3	
<b>Landscape</b>		
Impact of development works	CS-O-6, CS-P-2, CS-P-4, R-O-8, R-P-2*, BH-P-5, AH-P-2, AH-P-3, H-P-18	<p>TC-P-4 It is the policy of the Council to consider proposals for replacement telecommunications antennae and or support structures within Areas of Special Townscape Character, only in circumstances where any proposed new antennae can be sited and located in a manner that does not negatively impact on the visual amenities of any such area. Any proposal for replacement antennae shall be subject to all material considerations, including environmental designations and amenity considerations.</p> <p>TC-P-5 It is the policy of the Council to consider proposals to replace telecommunications support structures within Areas of</p>



Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required
Identification, Classification and protection of landscape	CS-O-10, E-O-7, E-P-8, E-P-13, R-P-3, R-P-7, R-P-13, BH-O-3, BH-P-3, BHP-8, BH-P-9, BH-P-10, NH-O-5, NH-P-4, NH-P-9, TC-P-7, CEH-P-7, H-P-4, H-P-14	Special Townscape Character only in circumstances where any proposed new support structure can be sited and located in a manner that does not negatively impact on the visual amenities of the area. Any proposal for replacement antennae support structures shall be subject to all material considerations, including environmental designations and amenity considerations.
<b>Other Issues</b>		
Housing	H-O-1, H-O-2, H-O-3, H-O-4, H-O-5, H-O-6, H-O-7, H-O-8, H-O-9, H-P-1, H-P-2, H-P-3, H-P-4, H-P-5, H-P-6, H-P-7*, H-P-8, H-P-9, H-P-10, H-P-11, H-P-12, H-P-13*, H-P-16, H-P-17, H-P-19, H-P-20, H-P-21, H-P-22, H-P-23, H-P-24, H-P-25, H-P-26, H-P-27, H-P-28, H-P-29*	
Development of recreation and tourism facilities	CS-O-5, E-O-1, E-P-7, E-P-19, E-P-20, E-P-21, E-P-22, E-P-23, E-P-24, E-P-25, R-O-10, BH-O-2, RD-P-6, CEH-P-4, CEH-P-6	
Coastal Management	NH-P-10	
Waste management	WW-P-2, WW-P-3	
Soils	CS-O-1, CS-O-2, CS-O-4, CS-P-1, CS-P-4, H-P-7	
Employment and Enterprise Developments	CS-O-1, CS-O-6, E-O-2, E-O-3, E-O-4, E-O-5, E-O-6, E-O-8*, E-P-1, E-P-2, E-P-3, E-P-4*, E-P-5, E-P-6, E-P-7, E-P-8, E-P-9, E-P-10, E-P-11, E-P-12, E-P-13, E-P-14, E-P-15, E-P-16, E-P-17, E-P-18, E-P-19, E-P-20, E-P-21, E-P-22, E-P-23, E-P-24, E-P-25, E-P-26*, E-P-27	

\* **New or amended objectives policies resulting from the AA process.**

#### 2.6.4 RE-Wording of Plan Provisions

This section shows examples of how the wording of certain Plan provisions has been influenced by the SEA process. It does not include all references within the plan nor indicate amendments and modifications arrived at throughout the plan drafting process as a result of the SEA process. Examples of plan provisions that were reworded are as follows:

(Note: the text in blue depicts new text added to the original policy/objective and ~~strikethrough~~ indicates text that has been omitted.)

### Chapter 3: Economic Development

- E-O-1:** To **facilitate the sustainable development** of ~~develop~~ Buncrana as a Development Centre with specific focus upon Tourism’.
- E-O-6:** To provide adequate infrastructure, including water, wastewater treatment and waste management facilities to accommodate future **sustainable** economic growth and job creation’.
- E-O-9:** To pursue the implementation of recommendations contained within the Buncrana Walking and Cycling Strategy 2012, including the development/ enhancement of routes labelled in Table 7, subject to compliance with Article 6 of the Habitats Directive **and, where relevant, subject to compliance with the requirements of the SEA Directive (S.I. No. 435 of 2004 as amended)**.

### Chapter 5: Built and Natural Heritage

#### **New Policy NH-P-1:**

It is the policy of the Council to ensure development proposals do not damage or destroy any sites of international or national importance, designated for their wildlife / habitat significance.

#### **Reword Policy NH-P-3:** (NB. New text shown in blue) :

It is the policy of the Councils to require the consideration of designated Shellfish Waters and their Shellfish Pollution Reduction Programmes in all development proposals within their catchments **and to ensure the implementation of identified measures within Pollution Reduction Programmes including periodic review.**

## **Section 3: Environmental Report and Submissions/ Observations**

### **3.1 Introduction**

This section details how both the Environmental Reports and the submissions and observations that were received made to the planning authority on the Environmental Reports and SEA process, have been taken into account during the preparation of the Plan.

### **3.2 SEA Scoping Submissions and Observations**

As referenced under Section 2.2, a pre-scoping report was prepared and circulated to the following 3 statutory bodies (EPA, DEHLG and DCENR) and the Department of Environment in Northern Ireland (DoENI) in case there were any transboundary issues. It was also circulated across-directorates within the Council.

One submission was received from a statutory consultee, the Environment Protection Agency (EPA) in response to the pre-scoping paper and was taken into account in the formulation of the scope of the SEA. A summary of the key points raised are as follows:

- Protection of Surface and Ground Water Quality
- Protection of Designated EU and National conservation sites / habitats / species.
- Maintaining good status of bathing waters.
- Provision of adequate and appropriate critical service infrastructure.

The following key plans should be taken into account;

- North West International River Basin Management Plan and Associated Programme of Measures.
- Border Regional Planning Guidelines 2010 – 2022.
- Pollution Reduction Programme for the Lough Swilly Shellfish & associated Characterisation Report.
- Donegal County Development Plan.
- Offshore Renewable Energy Development Plan.
- Grid 25 Implementation Programme.

The new SEA Regulations, should be referenced and integrated into the Plan and SEA process. In addition, the recent DECLG Circular (PSSP 6/2011) issued in July 2011, relates to, 'Further Transposition of the EU Directive 2001/42/EC on SEA' should also be referenced and integrated.

You should take into account the recent European Communities (Birds and Natural Habitats) Regs 2011 (S.I. No. 477 of 2011).

#### **Department of Environment, Northern Ireland**

Informal consultation between the Planning Authority and the Department of the Environment in Northern Ireland has been carried out during the first phase of the review of the Development Plan. It is the view of the Council that formal transboundary consultation is not required, as the implementation of the Plan will not have significant impacts on the environment of a member state. In accordance with the provisions of the Planning & Development Acts 2000 (as amended), the Minister of the Environment, Community and Local Government has been notified of the Councils views. The Northern Ireland Environment Agency had no comments to make.

### **3.3 Environmental Report Submissions and Observations**

The Border Regional Authority, Environmental Protection Agency, the Department of Arts, Heritage & the Gaeltacht and the Northern Ireland Environment Agency (NIEA) made submissions on the Draft Development Plan and Environmental Report during the public consultation period. The NIEA agreed with the conclusion of Donegal County Council that formal Transboundary consultation with Northern Ireland is not required having regard to the distance of Buncrana from the River Foyle & Tributaries SAC and ASSI and lack of hydrological links; and as a result of the distance from the Lough Foyle SPA, Ramsar and ASSI. The information contained in the submissions were taken into account in the SEA and the Appropriate Assessment, which was undertaken for the Plan. The submissions resulted in the following updates being made to the Environmental Report that accompanied the Draft Plan:

- 1.** To amend Appendix 2 of the draft plan, the 'Environmental Report', by inserting additional text on page 37 at Table 9 so as to state as follows: (NB: New text shown in [blue](#))

**Table 9: Assessment of the likely significant impacts on the environment of implementing the strategic alternatives:**

Each of the options 1, 2 and 3 are considered against the environmental protection objectives formulated and set out in the assessment matrix below. The full range of impacts of implementing each alternative are considered to be more appropriately assessed at project level however, in the strategic context, these are set out in the 8<sup>th</sup> column of Table 9 so as to identify whether there are potential secondary, cumulative, synergistic, short, medium term, long term, permanent, temporary, positive and/ or negative effects.

Strategic Alternative	Probably conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential conflict with the status of SEOs- likely to be mitigated to an acceptable level	Uncertain interaction with status of SEOs	Neutral interaction with status of SEOs	No likely interaction with status of SEOs	Likely to improve status of SEOs	Identification of the full range of potential impacts (secondary, cumulative, synergistic, short term, medium term, long term, permanent, temporary, positive and/ or negative effects).
1. Continuation of existing policy framework	P2, S1, S3, M1, M2, L1	B1, B2, B3, B4, S2, W1, W2, W3, W5, A1, A2	C1	P1	H1, S4, S5, W4		Secondary/ cumulative/ synergistic.  Short, medium & long term.  Temporary & permanent.  Positive & negative effects.
2. Incremental growth/ consolidation and the continuation of the existing environmental protection			S1, A1, A2	P1, W2, W3, W4, M1	H1, S4, S5, W1, M2, C1	B1, B2, B3, B4, P2, S2, S3, W5	Secondary/ cumulative/ synergistic.  Short, medium & long term.  Temporary & permanent.  Positive and negative effects.
3. Incremental growth/ consolidation and strengthen environmental protection				P1, W2, W3, W4	H1, S4, S5, W1, M2, C1	B1, B2, B3, B4, P2, S1, S2, S3, W5, A1, A2, M1, L1	Secondary/ cumulative/ synergistic.  Short, medium & long term.  Temporary & permanent.  Positive effects.

2. To amend Appendix 2 of the draft plan, the 'Environmental Report', by inserting additional text on Page 37 , immediately under the header entitled 'Preferred Strategic Alternative' so as to state as follows: (NB: New text shown in blue)

### **'Preferred Strategic Alternative**

On the basis of the assessment, option 3 is considered to be the preferred option/growth strategy for the Plan. This approach accords with the Regional Planning Guidelines 2010 and the County Donegal Development Plan 2012-2018. The sequential development approach developing from the core outwards provides the necessary environmental protection in accordance with Strategic Environmental Assessment and the Appropriate Assessment.

Taking the assessment of the preferred strategic alternative (Table 9, Option 3) and considering the full range of environmental effects of the implementation of the Plan, it is demonstrated that the plan will, on balance, have significant positive benefits in relation to the environmental assets. This is shown to be most effective through interrelationships of the objectives and policies that are set out in chapter 5 of the plan, 'The Built & Natural Heritage' with the other chapters of the plan which address the development pressures in the County such as new economic development, new housing development, new renewable energy projects. The interrelationships that exist are appropriate to achieve the proper checks and balances in terms of environmental considerations and in this regard the Plan must be read as a whole unit rather than considering individual objectives and policies in isolation'.

3. To amend Appendix 2 of the draft plan, the 'Environmental Report', by inserting additional text on page 44, at the end of the second paragraph so that the paragraph reads as follows: (NB: New text shown in blue):

'Pressure on shellfish growing areas can come from any source which discharges into water, and the Lough Swilly Pollution Reduction Programme cites a number of key pressures including on-site waste water treatment systems and 8 urban waste water systems around the Lough including Bunrana's. The relevant measures set out in the Action Programme contained in the 'Pollution Reduction Programme' include that the Local Authority must comply with the conditions of the Waste Water Discharge License granted in respect of the Bunrana urban waste water system, in particular sections 5.6 and 5.7 with regard to impact of Discharge, possible need for disinfection treatment and notification of incident to specified authorities. In relation to the pressures arising from on- site waste water treatment systems (OSWWTS), the action programme states that, in addition to the report of Donegal County Council on the 'Possible Risks from On- Site Wastewater Treatment Systems on Designated Shellfish Water Areas', a number of other actions are required. These actions include the issue of a questionnaire to dwellings in high risk areas, assessment of dwellings directly adjacent to the foreshore, carry out a shoreline walking survey to identify potential OSWWTS issues, sampling from watercourses, issue an advisory leaflet on management of OSWWTS, follow up with a Measures and Enforcement Programme. In addition, all new planning applications for dwellings served by a OSWWTS should be required to comply with the EPA 'Code of Good Practice for Waste Water Treatment & Disposal Systems Serving Single Houses'.

4. To amend Policy NH-P-3, page 63 of the Core Document (Draft Plan) so as to insert additional text as follows: (NB: New text shown in blue)  
'NH-P-3: It is the policy of the Council to require the consideration of designated Shellfish Waters and their Shellfish Pollution Reduction Programmes in all development proposals within their catchments and to ensure the implementation of identified measures within Pollution Reduction Programmes including periodic review.'
5. To amend Appendix 2 of the draft plan, the 'Environmental Report', by inserting additional text into the 3<sup>rd</sup> column of Table 24, page 73 in respect of B2 & B3 to state: 'Enhancement of biodiversity'.

6. To amend Appendix 2 of the draft Plan, the 'Environmental Report', by amending Table 24, at the 3<sup>rd</sup> column in relation to the target of W2 so as to state: (Text for deletion shown as strikethrough; new text shown in blue). 'Commission secondary treatment plants in areas with low assimilative capacity for waste water or where primary treatment is ~~adequate~~ **inadequate**'.
7. To amend Appendix 2 of the draft plan, the 'Environmental Report', section 9.0, by inserting additional text so that it reads as follows: (Text for deletion shown as strikethrough; new text shown in blue).  
'It is necessary to set out measures as part of the SEA to monitor the significant environmental effects of the implementation of the plan and any gaps identified in the Environmental Report to help identify issues that need addressing or arise during the lifetime of the Plan. **Monitoring frequency will be annual.**
8. To amend Appendix 2 of the draft plan, The Environmental Report, Table 5, page 15 so as to insert an additional row under the 'Climate Change' header at the 'International' level so as to state as follows:

Climate Change		
International	EU Adaption Strategy 2013	Provides a framework for managing future climate risk, prioritizing and coordinating actions. Aims to integrate climate risk as a normal part of decision making.

### 3.4 Environmental Report

The Environmental Report and the Draft Plan were placed on public display from the 2<sup>nd</sup> August to 14<sup>th</sup> October 2013. A report on the submissions and observations received during that public consultation process was presented to the elected members of Bunrana Town Council and Donegal County Council in the Managers Report dated January 2014. It recommended that various measures be integrated into the Plan in order to mitigate environmental effects. That report was considered by the elected members of Bunrana Town Council on 12th March and by Donegal County Council on 31<sup>st</sup> March 2014 and it was decided to amend the draft. The amendments included "Material Alterations" that were subjected to further SEA to take account of changes being made to the Draft Plan and the findings of that SEA were presented in a further report on the Strategic Environmental Assessment of the proposed Material Alterations to the Draft Bunrana and Environs Development Plan 2014-2020. The proposed Material Alterations and the SEA report was on public display from 5<sup>th</sup> May to 4th June 2014 and a report on the submissions and observations made was presented in a Chief Executive's Report to the Members of Donegal County Council. It was resolved by the Members of Donegal County Council to make the Bunrana & Environs Development Plan 2014-2020 on 31<sup>st</sup> July 2014. Upon adoption of the Plan both reports were used to update the original Environmental Report into a final Environmental Report, which is available alongside the adopted Plan.

At each stage of the process the Elected Members took into account the findings of the Environmental Report on the Draft Plan and also the report on the Strategic Environmental Assessment of the proposed Material Alterations to the Draft Bunrana & Environs Development Plan 2014-2020.

## **Section 4: Alternatives and the Plan**

### **4.1 Introduction**

This section summarises the alternative scenarios for the Development Plan, the evaluation of these scenarios and the reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with.

### **4.2 Description of the Alternative Scenarios**

There were 3 strategic alternative development options considered. In considering the appropriateness of the alternatives, focus was on the delivery of a sustainable strategy that is consistent with the hierarchy of the National Spatial Strategy, the Border Regional Planning Guidelines and the County Donegal Development Plan. The following are the three alternatives considered:

- Strategic Alternative 1: Continuation of existing policy framework.
- Strategic Alternative 2: Incremental growth / consolidation and continuation of the environmental protection.
- Strategic Alternative 3: Incremental growth / consolidation and strengthening of the existing environmental protection.

#### **4.2.1 Alternative Scenario 1: Continuation of existing policy framework**

This alternative would comprise the continuation of the zoning framework adopted in the Bunrana and Environs Development Plan 2008-2014 wherein (a) the town centre area would be identified for strengthening (b) Existing areas would be identified as 'General Employment' (c) Defined areas of 'Local Environment' would be identified that provided for limited development where the landscape has the capacity to absorb and (d) The identification of the existing 'Primary Residential' lands supported by 'Strategic Residential Reserve'.

Having regard to the foregoing, it is considered that this approach would not be acceptable and would not be consistent with the Border Regional Planning Guidelines 2010 or the County Development Plan 2012- 2018 (as varied) in that the development pattern would weaken the town centre and its ability to support economic growth and vitality. Furthermore it would not direct development to locations with appropriate infrastructure and would encroach on the Natural environment.

#### **4.2.2 Alternative Scenario 2: Incremental growth / consolidation and continuation of the environmental protection.**

This alternative would reduce the quantum of land zoned in the Bunrana and Environs Development Plan 2008-2014 as 'Primarily Residential' for immediate development of housing in line with the County Development Plan 2012-2018 and the remaining residential land is then rezoned to 'Strategic Residential Reserve' for future residential development beyond the lifetime of the Plan. This alternative continues to provide environmental protection within a proportion of the area of Porthaw, Bunrana Castle and its environs and coastal lands to ensure that no further development takes place.

Having regard to the foregoing, it is considered that this alternative would be an acceptable option as it is broadly in line with Border Regional Planning Guidelines 2010 and the CDP 2012-2018 in terms of population and land supply, which would focus the primary residential land in and around the town centre and expand outwards in an incremental manner. However, the quantum of land within 'Strategic Residential Reserve' would far exceed the potential demand for housing within the 2030 horizon of this



plan and would not reflect planned infrastructure provision. It would facilitate sporadic development outside the main built up form of the town, thus negating the opportunity to achieve a consolidated urban form.

#### **4.2.3 Alternative Scenario 3: Incremental growth / consolidation and strengthening of the existing environmental protection.**

This alternative would examine all land zoned in the Buncrana and Environs Development Plan 2008-2014 as 'Primarily Residential' and 'Strategic Residential Reserve' and identify sufficient lands to deliver the quantum of housing for Buncrana over the plan period as provided for in the CDP 2012-2018. The plan would also identify a Strategic Residential Reserve landbank that could be reviewed through future development plans and any surplus lands would be rezoned for Agricultural/Rural use. This alternative also provides a greater degree of environmental protection within Porthaw, Buncrana Castle and its environs and coastal lands in recognition that this is an important transitional green area between the coast and the built up urban form of the Northern section of the plan area in terms of its landscape, wildlife, amenity and historic value.

### **4.3 Reasons for choosing the Plan in light of the other reasonable alternatives dealt with**

The alternatives that were examined were produced and evaluated having regard, inter alia to environmental consequences. The Development Plan which emerged from the Plan preparation process and was adopted is Scenario 3. This alternative would result in a positive change in development patterns resulting in the primary residential land in and around the town centre and expanding outwards in a sequential manner, with the 'Strategic Residential Reserve' further outside the main built up form of the town. This approach would provide for the orderly and sequential development of serviced lands and the creation of a coherent urban form, which can be readily serviced by public infrastructure and transport, which is consistent with the Border Regional Planning Guidelines and the County Donegal Development Plan. In terms of environmental issues the conservation of biodiversity has been strengthened and expanded in recent years and this alternative provides the necessary environmental protection in accordance with Strategic Environmental assessment and Appropriate Assessment.

## **Section 5: Monitoring Measures**

### **5.1 Introduction**

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section and Section 8 of the Environmental Report contain proposals for monitoring the likely significant effects of implementing the Development Plan. Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action. In addition to this, monitoring can also play an important role in assessing whether the Plan is achieving its environmental objectives and targets - measures which the Plan can help work towards - whether these need to be re-examined and whether the proposed mitigation measures are being implemented.

### **5.2 Indicators and Targets**

Monitoring is based around the indicators which were chosen earlier in the process. These indicators allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives used in the evaluation. Focus will be given to indicators which are relevant to the likely significant environmental effects of implementing the Development Plan and existing monitoring arrangements will be used in order to monitor the selected indicators. Each indicator to be monitored will be accompanied by the relevant target(s) which were identified with regard to the relevant legislation. Table 24 of the Environmental Report shows the indicators and targets which have been selected with regard to the monitoring of the Plan.

### **5.3 Sources of Monitoring Information**

Measurements for indicators should come from existing monitoring sources and no new monitoring should be required to take place. Existing monitoring sources exist for each of the indicators and include those maintained by the Donegal County Council and other relevant authorities e.g. the Environmental Protection Agency, the National Parks and Wildlife Service and the Central Statistics Office. Where significant adverse environmental effects are likely to occur as a result of implementing relevant lower-tier plans and programmes, including positive, negative, cumulative and indirect effects of these lower tier plans and programmes, such instances should be identified and recorded and should feed into the monitoring evaluation.

### **5.4 Reporting**

A preliminary monitoring evaluation report on the effects of implementing the Development Plan will be prepared to coincide with the Manager's report to the Elected Members on the progress achieved in securing Plan objectives within two years of the making of the Plan. Indicators and targets will be reviewed during the preparation of the preliminary monitoring evaluation report.

Monitoring of the implementation of the Plan is required in order to properly consider the effects of the implementation of the plan and to highlight areas that need re-assessed and/or reconsidered for review. It also establishes a baseline from which to carry out the statutory 2 year and 4 year reviews. Part of

this monitoring shall be that required by the SEA process itself and shall be based on the Environmental Objectives, Indicators and Targets as set out in section 9.0 of the Environmental Report (Table 24), which are presented in the table below and the thresholds at which corrective action will be considered are identified under the heading 'Targets'.

**Table 3: Environmental Protection Objectives, Indicators and Targets**

<b>Biodiversity, fauna and flora</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
B1: Ensure compliance with the Habitats Directive by protecting all Natura 2000 sites and habitats of species (SACs and SPAs) within the County.	Number and nature of developments permitted in or within the 15km buffer of the Natura 200 site.	Maintenance of favourable conservation status of the qualifying interests of all Natura 2000 sites.  Control of inappropriate development in and within 15km of Natura 2000 sites or likely to impact upon the qualifying interests of Natura 2000 sites.
B2: Conserve and enhance the biodiversity of key areas of biodiversity namely; Porthaw, Mill River, Crana River and Luddan Coastal Strip.	Conservation status of habitats and species as reported by NPWS.  Annual AER report prepared by the Council for the EPA wastewater treatment discharge licence.	Maintenance of favourable conservation status of all Natura 2000 habitats of species and sites.  Compliance with NWIRBD.  Protection of Buncrana's rivers from ecological damage.
B3: Conserve and enhance the diversity of habitats and protected species and promote the sustainable management of these areas.	Conservation status of habitats and species as reported by NPWS.	Maintenance of favourable conservation status of all Natura 2000 habitats of species and sites.  Compliance with NWIRBD.
B4: Protect the marine environment and promote integrated coastal zone management strategies.	Quality of Lough Swilly designated shellfish growing areas as reported by DEHLG.  Number of blue flag beaches.  Number of green flag beaches.  EPA bathing water quality annual reports.  Annual AER report prepared by the Council for the EPA wastewater treatment discharge license.	Incorporate the pollution reduction programmes for shellfish waters.  Improve bathing water quality.

B5: Protect macro corridors and contiguous areas of habitat.	Hedgerow and riparian corridor length.	Maintenance of contiguous hedgerows, planted areas and waterways and their associated habitats.
<b>Population</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
P1: Facilitate a good quality of life based on high-quality residential, working and recreational environments.	Provision of employment.  Provision of services.  Provision of amenities.  CSO statistics.	Increase in employment opportunities.  Increase and improvement of services.  Increase and improvement of amenities.
P2: Facilitate more sustainable travel patterns.	Provision of sustainable travel modes.	Increase and improvement of sustainable travel in the County.  Implementation of the Buncrana Walking and Cycling strategy.
<b>Human health</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
H1: Minimise noise, vibration and emissions from traffic, industrial processes and extractive industry.	Occurrence of a spatially concentrated incidence of deterioration in human health (EPA, Local Reports).	No spatially occurring incidences.
<b>Soil (including minerals)</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
S1: Protect and maintain the quality of soils.	EPA/Teagasc National Soils Mapping Project	Conservation of soil.
S2: Protect and conserve geological sites.	Number and area of geological heritage sites as mapped by GSI. Tellus Border Project.	Protection of geological sites.
S3: Give preference to the re-use of brownfield lands, rather than developing greenfield lands.	Location and area of brownfield sites developed and permitted for development over the plan period.	Develop as many brownfield sites as appropriate and possible.

S4: Minimise the consumption of non-renewable sand, gravel and rock deposits.	Quarry.	
S5: Minimise the amount of waste to landfill.	Amount and nature of waste to landfill and location of landfill.  Amount of recycling.	Reduce amount of waste to landfill.
<b>Water:</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
<p>W1: Protect and enhance the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems, in accordance with the North Western River Basin Management Plan (2009-2015).</p> <p>W2: Protect the quality of surface and groundwater quality as sources of drinking water, assets for amenity, and recreation and ecosystem purposes.</p>	<p>Water quality monitoring results by the EPA and County Lab, for:</p> <ul style="list-style-type: none"> <li>• Surface water ecological and chemical status.</li> <li>• Status of Estuarine and Coastal Waters.</li> <li>• Bathing Water Quality.</li> <li>• Groundwater Quality.</li> <li>• Drinking Water quality.</li> </ul> <p>Number of Public Water Supplies on EPA remedial Action list.</p> <p>EPA data under 'Urban Wastewater Discharges in Ireland population Equivalents greater than 500 persons report for 2010-2011.</p> <p>Compliant discharge licenses granted by the EPA.</p>	<p>Protect and restore areas identified in the NWIRBD and achieve 'good' status by 2015 in accordance with the NWIRBD objectives.</p> <p>Improvements in levels of compliance with drinking water quality standards and promotion to above national average compliance rate.</p> <p>Commission secondary treatment plants in areas with low assimilative capacity for waste water or where primary treatment is adequate.</p>
W3: Promote sustainable water use based on a long-term protection of available water resources.	Water meter readings.	<p>Improve water conservation.</p> <p>Reduce unaccounted for water.</p>
W4: Reduce progressively discharges of polluting substances to waters.	Water quality monitoring results by the EPA and County Lab, for:	Protect and restore areas identified in the NWIRBD and achieve 'good' status by 2015 in accordance with the

	<ul style="list-style-type: none"> <li>• Surface water ecological and chemical status.</li> <li>• Status of Estuarine and Coastal Waters.</li> <li>• Bathing Water Quality.</li> <li>• Groundwater Quality.</li> <li>• Drinking Water quality.</li> </ul>	<p>NWIRBD objectives.</p> <p>Improvements in levels of compliance with drinking water quality standards and promotion to above national average compliance rate.</p>
<p>W5: Manage the risk of coastal, estuarine and fluvial flooding.</p> <p>Manage the risk of droughts.</p>	<p>Number of housing developments permitted on flood plains or lands likely to flood.</p>	<p>Improved flood risk management in areas prone to flooding.</p> <p>Reduction in incidents of flood damage to properties.</p>
<b>COAST/Marine Resource</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
<p>CM1: Avoid coastal erosion and promote coastal protection.</p> <p>Manage the coastal zone as an environmental and tourist resource.</p>	<p>Development within the coastal zone, and which accesses coastal areas (tourism development).</p>	<p>Conserve and enhance the coastal resource as an environment, amenity and resource.</p>
<b>Air/climatic factors:</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
<p>A1: Support the National Climate Adoption Framework (Building Resilience to Climate Change) DECLG December 2012.</p> <p>Reduce all forms of air pollution.</p>	<p>National level of carbon emissions.</p> <p>Local Air quality monitoring results.</p> <p>Planning applications including renewable energy development.</p>	<p>20% reduction in greenhouse gas emissions from 1990 levels by 2020.</p> <p>Full delivery of Climate Change strategies.</p>
<p>A2: Promote and support a shift from fossil fuel dependent energy to more sustainable energy.</p> <p>Promote and support a shift from fossil fuel dependant vehicles to more sustainable</p>	<p>I-Plan results of numbers of developments permitted with renewable energies.</p> <p>Average daily motor vehicle flows.</p> <p>Proportion of travel by mode.</p>	<p>Reduce road traffic in line with Smarter Travel, A Sustainable Transport Future.</p> <p>Increased investment in cycle paths and footpaths.</p>

modes of travel.	Investment in public transport.	Consider recommendations of OREDP in Off shore wind energy developments.
<b>Material assets:</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
M1: Maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources.	Availability and quality of community related infrastructure, services and facilities and status of environmental resources.	
M2: Avoid flood risk and/or coastal erosion in selecting sites for development.	Number of community related developments on vulnerable coastal sites/ sites prone to flooding.	Improved flood risk management in areas prone to flooding.  Reduction in incidents of flood damage to premises.
<b>Cultural heritage:</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
C1: Promote the protection and conservation of the cultural, including architectural and archaeological, heritage.	Number of structures on RPS in relation to Ministerial Recommendations arising from NIAH County inventory.  Number of ACAs.  Number of Monuments on the RMP and areas of archaeological potential which have been recorded or subject to exploration as a result of development.  Number of protected structures or archaeological monuments damaged due to development.	To increase the number of protected structures in line with ministerial recommendations arising from NIAH surveys.  To conserve both townscapes and landscapes of value.  To maintain and increase the number of archaeological features recorded and protected.  No damage occurring to structures or monuments due to development.
<b>Landscape:</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
L1: Conserve and enhance valued natural and historic	Preparation of a Landscape Character Assessment for the	Conserve and enhance the townscape and landscape of Buncrana.

landscapes (townscape) and features within them and avoid adverse impacts, including those that contribute to the character of Buncrana.	County and including Buncrana.	Appropriate Heritage Appraisal and Landscape Capacity Assessment to inform any future development within the plan area.
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## 5.5 Responsibility

Donegal County Council is responsible for collating existing relevant monitoring data, the preparation of preliminary and final monitoring evaluation reports, the publication of these reports and, if necessary, the carrying out of corrective action.