



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



**Comhairle Baile  
Bhun Cranncha**  
Buncrana Town Council

# **Draft Buncrana & Environs Development Plan 2014–2020**

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**Appendix 2  
Environmental Report**

July 2013

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## 1.0 Introduction

This Environmental Report forms part of the Strategic Environmental Assessment (SEA) of the review of the Buncrana and Environs Development Plan and shall be published alongside the Buncrana and Environs Development Plan 2014-2020 and the Appropriate Assessment (AA).

Within a land use Development Plan process the SEA is a systematic process that predicts and evaluates the likely environmental effects of implementing a plan and provides an understanding of the environmental consequences of implementing the objectives and policies of a plan. This environmental report sets out how a Strategic Environmental Assessment was carried out for the review of the Buncrana and Environs Development Plan, and includes a description of the current environment along with an assessment of the effects of implementing the policies and objectives of the Plan, necessary changes and considerations and mitigation and monitoring proposals going forward.

### 1.1 Non Technical Summary

#### Introduction

This is a Non-Technical Summary of the Environmental Report on the Buncrana and Environs Development Plan 2014-2020.

The Planning and Development Act 2000 (as amended) requires that a Strategic Environmental Assessment, (pursuant to the SEA Directive) and an Appropriate Assessment (pursuant to the EU Habitats Directive) be carried out as Part of the Development Plan process.

The review of the Buncrana and Environs Development Plan and preparation of the new Buncrana and Environs Development Plan runs in parallel with the Strategic Environmental Assessment (SEA) and Appropriate Assessment (AA) and both these processes have significantly influenced the drafting of the Buncrana and Environs Development Plan. In this regard environmental considerations have been considered throughout the Plan process and have been incorporated into the Plan ensuring the continuation of a qualitative environment. The Environmental Report is the primary element in the SEA process and shall be published alongside the Buncrana and Environs Development Plan 2014-2020.

**Table 1: Steps in the SEA Process**

Scoping: Consultation with Statutory bodies and other interested parties on the scope and level of detail to be considered in the assessment.	<b>Completed</b>
Preparation of Environmental Report: An assessment of the likely significant impacts on the environment as a result of the Plan.	<b>Completed</b>
Consultation on the Buncrana and Environs Development Plan and associated Environmental Report and Appropriate Assessment.	<b>Next Stage</b>
Evaluation of submissions and observations made on the Buncrana and Environs Development Plan, Environmental Report and Appropriate Assessment.	
Assessment of the likely significant impacts on the environment as a result of the Material Alterations.	
Consultation on the Material Alterations to the draft Buncrana and Environs Development Plan and associated Environmental Report & Appropriate Assessment.	
Evaluation of submissions and observations made on the Material	

Alterations to the Draft Buncrana and Environs Development Plan, Environmental Report and Appropriate Assessment.	
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Preparation of an SEA Statement identifying how environmental considerations and consultation have been integrated into the Adopted Buncrana and Environs Development Plan.	
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### **Content of Environmental Report**

The Environmental Report considers all of the following in accordance with the requirements of the SEA Directive:

- Biodiversity
- Population and Human Health
- Flora and Fauna
- Soil and Water
- Air and climate
- Material Assets
- Cultural Heritage (including Archaeological and Architectural)
- Landscape
- Interrelationship between above

In the first instance the Environmental Report details the Current State of the Environment of the Buncrana and Environs Plan area and hinterland within each of the sub headings set out above, and interrelationships between each of the environmental topics. The Environmental Report then examines significant environmental pressures that may affect each of the environmental topics and the current (Baseline) State of the Environment.

### **Key Issues to address in the Buncrana and Environs Development Plan**

The Buncrana and Environs Development Plan 2014-2020 sets out the following key Issues to address in the plan;

- The need to promote Buncrana as a Development Centre, with a tourism focus, so that it performs to its maximum potential as a support town to the Letterkenny/Derry linked gateway and to the wider peninsula.
- The need to plan against urban sprawl and provide for the sequential growth of the town.
- The need to consolidate and strengthen the town centre.
- The need to harness the economic potential of the heritage of the town in a sustainable way.
- The need to provide or facilitate the provision of hard infrastructure (e.g. transport, communications, water, wastewater) and soft infrastructure (e.g. schools, community/social facilities, amenities, public spaces and services etc) necessary to support existing and future development at appropriate locations.
- The need to protect the environmental assets of the town and its environs.
- The need to protect the architectural and archaeological heritage of the town.

### **Policy Context**

The review of the Buncrana and Environs Development Plan must be considered within the context of a hierarchy of policies, plans and strategies of international, national, regional and local level as detailed in table 5 section 1.5 of the report. Other relevant Plans, policies and programmes were considered in this report and are referenced throughout.

### **Appropriate Assessment**

An Appropriate Assessment has also been carried out in accordance with Article 6 of the EU Habitats Directive and as required under the Planning and Development Acts. The AA is a separate but parallel process that has overlapped significantly with the SEA process in the

drafting of the Buncrana and Environs Development Plan, due to the importance of the 2 Natura 2000 sites within the plan boundary and the 9 Natura 2000 sites within 15km of the plan area. The Natura Impact Report shall be published parallel to the Buncrana and Environs Development Plan and Environmental Report.

#### **Alternative Approaches to the Plan.**

The SEA Directive requires the consideration of SEA Alternatives and section 4.0 of this report sets out and examines the following 3 strategic alternative development options based on the population growth allocation set out in the plan (filtered from the Regional Planning Guidelines 2010 and the County Donegal Development Plan 2012-2018).

#### **Strategic Development Options Alternatives:**

Working within the above figures there are 3 strategic alternative development options now considered. In considering the appropriateness of the alternatives, focus is on the delivery of a sustainable strategy that is consistent with the hierarchy of plans.

#### **Alternatives:**

The following are the three alternatives considered:

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

The following paragraphs set out the nature of each alternative together with the key characteristics of the alternative and the likely impacts that will arise.

#### **Strategic Alternative 1: Continuation of existing policy framework**

This alternative would comprise the continuation of the zoning framework adopted in the Buncrana 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'.

The key principles of this strategic alternative are as follows:

1. Identification of town centre and expanded area at Ardaravan Square including retail strategy requiring sequential approach to retail proposals supported by the identification of 'opportunity' sites outside the town centre the regeneration of which is encouraged.
2. A proportion of Porthaw, Buncrana Castle and its environs and coastal lands in this area would be identified to ensure that no further development takes place.
3. Identification and prioritisation of infrastructural improvements.
4. Identification of 'Primarily Residential' lands on coastal side of outer relief road.
5. Identification of 'Strategic Residential Reserve' lands on eastern side of outer relief road to fulfil long term housing needs beyond the life of the plan.
6. Identification of lands on eastern side of outer relief route, and lands at Barrack Hill, as 'Local Environment' providing for one off housing where the landscape has the capacity to absorb the development proposed.
7. Support and protect existing economic base by identifying economic opportunities at Luddan and Ballymacarry, along the key strategic transport node connecting the R238 and route of outer and inner relief roads and at lands immediately north of the town centre along inner relief road and Cockhill Road.

8. Continued protection of 3 Protected Structures and identification of a 'Special Character Area' to seek to protect the built heritage.

Having regard to the foregoing, this alternative would result in the continuation of existing patterns of development and would therefore see the population growth continue to weaken in the urban core of Buncrana and grow at a high rate in the environs of the town. It is considered that this approach would not be consistent with the Border Regional Guidelines 2010 and the County Development Plan 2012- 2018 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.

### **Strategic Alternative 2: Incremental growth/consolidation and continuation of the environmental protection**

This alternative would reduce the quantum of land zoned in the Buncrana 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, Buncrana Castle and its environs and coastal lands to ensure that no further development takes place.

The key principles of this strategic alternative are as follows:

1. To ensure that the quantum of housing land supply does not exceed the housing lands requirement as set out in the County Development Plan 2012-2018 Core Strategy.
2. Identification of 'Strategic Residential Reserve' outside the town centre to fulfil long term housing needs beyond the lifetime of the plan.
3. Consolidation of urban footprint.
4. Encouraging growth of the town in a sequential manner outwards from the core so as to make the best use of planned infrastructure.
5. Same level of environmental protection of the Development Plan 2008-2014 which identified a proportion of Porthaw, Buncrana Castle and its environs and coastal lands in this area would be identified to ensure that no further development takes place.
6. Support and protect the existing economic base of Buncrana to ensure that this Tier 2 settlement is a key centre for economic growth as set out in the CDP 2012-2018 Core Strategy.
7. Identify and prioritise infrastructural improvements to ensure the growth of Buncrana as a tier 2 settlement in line with the CDP 2012-2018 Core Strategy.
8. Identification of town centre and expanded area at Ardaravan Square including retail strategy requiring sequential approach to retail proposals.

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.



### **Strategic Alternative 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.

The key principles of this strategic alternative are as follows:

1. To ensure that the quantum of housing land is consistent with the housing lands requirement as set out in the County Development Plan 2012-2018 Core Strategy.
2. Identification of an appropriate quantum of 'Strategic Residential Reserve' outside the town centre to fulfil long term housing needs beyond the lifetime of the plan.
3. Consolidation of urban footprint.
4. Encouraging growth of the town in a sequential manner outwards from the core so as to make the best use of planned infrastructure.
5. High level of environmental protection in line with the Habitats Directive and to support the CDP 2012-2018 core strategy of concentrating development in the core of the town.
6. Support and protect the existing economic base of Buncrana to ensure that Buncrana as a tier 2 settlement is a key centre for economic growth as set out in the CDP 2012-2018 Core Strategy.
7. Identify and prioritise infrastructural improvements to ensure the growth of Buncrana as a tier 2 settlement in line with the CDP 2012-2018 Core Strategy.
8. Identification of town centre and expanded area at Ardaravan Square including retail strategy requiring sequential approach to retail proposals.

Having regard to the foregoing, 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. In terms of environmental issues the conservation of biodiversity has been strengthened and expanded in recent years and this alternative reflects this emphasis and in particular is compatible with Article 6 of the Habitats Directive.

The 3 Strategic Alternatives were tested against the Strategic Environmental Objectives as set out in table 9, section 4 of this report. Strategic Alternative 3 was most compatible with the Strategic environmental objectives as well as being the most compatible with the strategy set out in the Regional Planning Guidelines 2010 and the CDP 2012-2018. This Strategy provides the framework for deciding on the scale, phasing and location of lands to be zoned for primarily 'Residential' use and for a mixture of residential and other uses, having regard to existing services and planned investment over the coming years.

As a consequence of introducing this Core Strategy, there will be a significant reduction in the volume of lands zoned for 'Primarily Residential' use, compared to the provisions of the 2008-2014 Development Plan. In addition, the quantum of lands zoned as 'Strategic Residential Reserve' shall be reduced to reflect population growth trends over the plan

horizon to 2030 and the release of these lands shall be considered as part of subsequent plan reviews, subject to housing need, availability of capacity in infrastructure, development is sequential and that it accords with the Government's Urban Design Manual 2009.

### SIGNIFICANT ENVIRONMENTAL PRESSURES

Section 6 of the Environmental Report details the current environmental pressures within the Buncrana Plan area and these are summarized below:

**Table 2: Summary of Main Environmental Pressures within Buncrana**

Topic	Environmental Issue/Pressures
<b>Biodiversity, Fauna and Flora</b>	<p>Certain developments and activities associated with agricultural activities, afforestation, urban developments, windfarms, quarries, tourism, peat extraction, commercial fishing, and a wide range of infrastructural works (including road works, water abstraction, wastewater disposal) that are located within or close to ecologically sensitive sites can give rise to significant environmental pressures. There are 2 Natura 2000 sites within the plan area and 9 within 15km of its boundary; these are particularly sensitive to development.</p> <p>The protection of shellfish growing areas and salmon have been highlighted as of particular importance. The River Swilly is a designated Salmon river and a large portion of Lough Swilly is a designated shellfish water. These sites are particularly sensitive to certain development works and activities.</p> <p>Invasive non-native plant and animal species are a major threat to the biodiversity of the area.</p>
<b>Population and Human Health</b>	<p>Increases in population, their activities and settlement patterns have the potential to place increased pressure on biodiversity, water quality, landscape, cultural heritage and air. In particular, increased pressure on water quality arising from pollution can have a significant impact on human health. Individual and cumulative changes in the quality of the natural and built environment at local, regional and national level has the potential to impact to varying degrees on human health and wellbeing. High levels of radon in buildings and road safety have also been highlighted as significant issues.</p>
<b>Soil</b>	<p>Certain forms of development and activities can place a significant pressure in soils. Changes in precipitation arising from climate change could have significant impacts on slope stability and could impact on soil and water quality.</p>
<b>Water</b>	<p>Development and activities can often impact on water quality including groundwater, drinking water and bathing water. Development including wastewater and surface water disposal, landfills, quarries, contaminated lands, illegal dumping, agricultural activity, water recreational activities and afforestation can have significant impacts on water quality. Excessive inputs of nutrients, namely phosphorous and nitrogen present one of the most significant risks to water quality.</p>
<b>Air and Noise</b>	<p>Currently no significant impacts have been identified in respect to air quality or noise levels. Impacts arising from air pollution are</p>

Topic	Environmental Issue/Pressures
	primarily associated with transport and industrial emissions.
<b>Coast/Marine resource</b>	<p>Inappropriate development near/on the coast.</p> <p>Dynamic needs of the coast (coastal squeeze).</p> <p>Flood risk and coastal defences.</p> <p>Tourism impacts and sustainable management. Litter disposal and public services (e.g. toilets).</p> <p>Activities in the water.</p> <p>Coastal /Marine spatial planning.</p>
<b>Climatic factors</b>	<p>Increased greenhouse gas emissions have been linked with climate change resulting in increases in the intensity and frequency of flooding.</p> <p>Of particular concern is the high dependency on the use of the car arising from the dispersed settlement pattern and lack of adequate public transport system.</p>
<b>Renewable energy</b>	<p>Onshore and offshore opportunities and implications</p> <p>Onshore - Scenic amenity</p> <ul style="list-style-type: none"> <li>- Access roads</li> <li>- Loss of biodiversity</li> </ul> <p>Offshore - Impact on birds &amp; marine mammals</p> <ul style="list-style-type: none"> <li>- Deployment issues</li> <li>- Grid connection locations</li> </ul>
<b>Material Assets</b>	<p>Material assets include a wide range of natural and man made assets.</p> <p>These can include infrastructural services and facilities and other items such as cultural heritage, agricultural lands quarries and coastal and water resources. Developments and activities can often impact on these assets, some of which have been referred to herein. It has been highlighted that there is a high level of residential and commercial vacancy within the town. These properties represent an underutilized resource and if left idle, they can over time deteriorate and detract from the character of the area.</p>
<b>Cultural heritage, including Architectural and Archaeological</b>	<p>Pressures can arise from certain developments and activities on or near sites of heritage value. The visual amenities and character of the town and items of architectural, archaeological and historical importance, including shipwrecks, may be placed under pressure by such works. It is acknowledged that development works can often have a positive impact on our cultural heritage.</p>
<b>Landscape</b>	<p>Developments and activities can impact on visually sensitive areas including designated landscape and seascapes</p>
<b>Interrelationship between the above topics</b>	<p>Cumulative impacts and interaction of the above can give rise to increased pressure on the environment, although would vary in extent and nature. In particular, issues in respect of water quality, climate change and one-off housing in the plan area (not</p>

Topic	Environmental Issue/Pressures
	connected to water and wastewater mains) cross a number of environmental topic areas.

The following is a summary of certain areas where particular environmental pressures have been identified in the plan area,

Summary of Environmental Pressures in Buncrana

- A substantial area of the plan is within and abuts Natura 2000 sites.
- Proximity to designated salmon waters (Annex 1 species).
- Proximity to designated shellfish waters.
- Infrastructural schemes such as the proposed by-pass.
- One-off housing in the plan periphery.

**Flood Risk**

The Council shall seek to manage development within objectives and using a 'sequential approach/ flood risk scale as set out in Chapter 9 of the Development Plan and which are based on the 'precautionary principle' as detailed in section 7 of the Environmental Report.

**Likely Evolution of the Environment in the Absence of the Implementation of the Development Plan.**

The SEA Directive requires the consideration of likely evolution of the environment in the absence of the implementation of the plan. In real terms it is a legislative requirement to make the Development Plan, however an examination of the 'do-nothing scenario' demonstrated that to proceed in the absence of the implementation of the Buncrana and Environs Development Plan would be contrary to the proper planning and development of the area, this is set out in detail at section 8.0 of this report.

**Monitoring, Environmental Objectives, Indicators and Targets**

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 table 24, section 9 of this Environmental Report.

**Assessment of Objectives and Policies**

All of the Zonings, Objectives and Policies contained within the Plan were assessed against their likely impact on the Environment as set out in table 27 contained within section 9 of this report. This assessment was in addition to the Appropriate Assessment which focuses solely on the impact of the Plan on the 2 Natura 2000 sites (SAC and SPA) within the plan area and the 9 Natura 2000 sites within 15km of the plan boundary.

**Mitigation Measures**

Mitigation measures are required to protect the environment against any potential adverse effects as a result of implementation of the Plan. This was done in the first instance throughout the drafting of zonings, objectives and policies contained within the Plan, and also by amending, adding and replacing objectives and policies to ensure mitigation at implementation stage through best practice in the development management process and implementation of the Plan. In addition, certain individual applications for developments within the plan area may be subject to individual Environmental Impact Assessments and Appropriate Assessments.

**Incorporating Environmental Issues into the Buncrana and Environs Development Plan 2014-2020**

The table below outlines how the environmental issues raised throughout the SEA process were incorporated into the Plan as objectives, policies or otherwise. The table 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.

**Table 3: Incorporation of Environmental Issues into the Plan**

<b>Environmental Issue</b>	<b>Objective, Policy or reference in the Plan</b>	<b>Additional Policy Objective or Reference Required (final check)</b>
<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 15km of the plan boundary.	CS-O-4, 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 Atlantic 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	
<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-P-10, 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-	

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required (final check)
	8*, F-P-9*, F-P-10*	
<b>Water</b>		
Impact of development works on water quality.	CS-O-4, CS-O-8, E-O-6, WW-O-1	
Alignment with objectives and policies of the NWIRBD Plan.	CS-O-8, SP-1	
Wastewater, drinking water and bathing water quality.	CS-O-4, CS-O-8, E-O-6, WW-O-2, WW-P-2,	
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Climate Change and Air Quality.	CS-O-7,	
Limiting Greenhouse gas emissions and reducing dependency on fossil fuels.		
<b>Cultural Heritage</b>		
Impact of development works.	CS-O-10	
Identification and protection of geological sites,	NH-P-11	
Protection of architectural and archaeological structures and sites.	CS-O-9, 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	TC-P-4 It is the policy of the Councils 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. TC-P-5it is the policy of the Councils to consider proposals to replace

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required (final check)
		telecommunications support structures within Areas of 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
Identification, Classification and protection of landscape	CS-O-9, 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,	
<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-3, CS-P-1, CS-P-4, H-P-7,	
Employment and Enterprise Developments	CS-O-1, CS-O-5, 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 and policies resulting from the AA process.

## **1.2 Statutory Context**

The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004) translate the European Strategic Environmental Assessment (SEA) Directive 2001/42/EC into Irish Law. The Department of the Environment Heritage and Local Government 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'.

A Strategic Environmental Assessment of the Buncrana and Environs Development Plan 2014-2020 is a mandatory requirement pursuant to Article 13D of the aforementioned SEA Regulations, and has been drafted pursuant to the SEA Regulations and in accordance with the SEA Guidelines. These SEA guidelines set out the SEA process and set out the following requisite steps:

- Screening
- Scoping
- Environmental Assessment
- Environmental Report (currently at this stage)
- Consultation
- Evaluation of submissions and observations made
- SEA statement

## **1.3 Transboundary Consultation**

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 Buncrana and Environs Development Plan. It is the view of the Councils 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 and Development Acts 2000 (as amended), The Minister of the Environment, Community and Local Government has been notified of the Councils view.

## **1.4 Checklist of Contents of Environmental Report**

The following table sets out the information to be contained within the Environmental Report as set out in Annex 1 of the SEA Directive (2001/42/EC) and indicates where in this environmental report each is included.

**Table 4: Checklist of contents of Environmental Report**

<b>Contents of Environmental Report</b>		<b>Section of Report</b>
(a)	An outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes;	4.0
(b)	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	5.0 8.0
(c)	The environmental characteristics of areas likely to be significantly affected;	5.0
(d)	Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	6.0



Contents of Environmental Report		Section of Report
(e)	The environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	9.0
(f)	The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	9.0
(g)	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	9.0
(h)	An outline of the reasons for selecting alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know how) encountered in compiling the required information;	4.0
(i)	A description of the measures envisaged concerning monitoring in accordance with Article 10;	9.0
(j)	A non-technical summary of the information provided under the above headings.	1.0

### 1.5 Planning Context

The Buncrana and Environs Development Plan is placed within a hierarchy of other plans detailed below and as such the policies and objectives of the plan must accord with the National Spatial Strategy (2002), the Border Regional Planning Guidelines (2010-2022) and the County Donegal Development Plan 2012-2018.

**Figure 1: Hierarchy of Plans**



The National Spatial Strategy (NSS) 2002 sets out the strategic vision for the spatial development of the Country over a 20 year period, and identifies County Donegal as a distinct sub-region with the border region.

The Border Regional Planning Guidelines 2010-2022 builds on the provision of the NSS by providing for a succinct settlement hierarchy throughout the County based on the Core Strategy requirements of the Planning and Development Acts 2010. They set out a clear planning framework for growth in the County by setting out population targets which will inform settlement and housing strategies in addressing the proper planning and sustainable development of the County.

**County Donegal Development Plan 2012-2018 (CDP)**

The CDP came into operation in July 2012 and sets out the Council's strategic land use objectives and policies for the overall development of the County up to 2018 and beyond to a horizon year of 2022.

The CDP incorporates a Core Strategy that provides a 5 tiered settlement hierarchy. This hierarchy consists of;

- Letterkenny Gateway (Tier 1) as the primary driver of growth in the County.
- Strategic Support Towns and Villages (Tier 2).
- Strong Towns and Villages (Tier 3).
- Small Villages (Tier 4).
- Rural Areas (Tier 5).

Buncrana is positioned within Tier 2 'Strategic Support Towns' of the settlement hierarchy where the main aim for this Tier is for managed growth so as to continue to support sufficient critical mass in order to sustain the vibrancy and vitality of these centres and therein perform in a supporting role to the Gateway. Tier 2 towns have an important role in relation to supporting economic growth in the County. Objective CS-O-9(b) of the County Donegal Development Plan aims to establish Buncrana as a key growth centre for population as well as a key centre for economic growth across the sectors in concert with Buncrana Town Council.

**Table 5: Other relevant plans, programmes and strategies**

	Plan, Programme or Strategy	Key consideration for County Development Plan
<b>Biodiversity, fauna and flora</b>		
International	Strategic Environmental Assessment (SEA) Directive 2001/42/EEC	Requirement to carry out a Strategic Environmental Assessment.
	Convention on Wetlands of International Importance 1971 (amended 1982 and 1987) (Ramsar Convention)	Requirement to protect sites from loss or damage by development.
	Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora	Requirement to carry out an Appropriate Assessment.
	Directive 79/409/EEC on the conservation of wild birds	Requirement to protect and enhance ecological resources.
	UN Convention on Biological Diversity	
	Bern Convention on the Conservation of European Wildlife and Natural Habitats (1979)	Requirement to maintain diversity and distinctiveness.
	Pan-European Biological and Landscape Diversity Strategy (1995)	
	European Biodiversity Strategy (1998)	
	Freshwater Fish Directive (78/659/EEC)	
Shellfish Waters Directive (79/923/EEC)		
National	Planning and Development (Strategic Environmental Assessment) Regulations 2004 (SI No. 436 of 2004)	Conservation and enhancement of biodiversity.

	Plan, Programme or Strategy	Key consideration for County Development Plan
	Flora Protection Order 1980 (amended 1999)	Protection of species.
	Forestry Act 1946	Requirement to maintain biodiversity.
	Wildlife Act (1976)	
	Wildlife (Amendment) Act (2000)	
	National Biodiversity Plan 2004	
Local	Donegal Biodiversity Plan	
	Lough's Agency Licensing Programme	
<b>Soil</b>		
International	EU Thematic Strategy for Soil Protection	Aims to maintain and protect soil quality.
National	National soil survey of Ireland	Inform the plan
<b>Water</b>		
International	Directive 2000/60/EC Water Framework Directive	Requirement to achieve good ecological status by 2015 and ensure their status does not deteriorate.
	Directive 2007/60/EC Flood Risk Management	Assessment and Management of Flood Risk
	EU Drinking Water directive (98/83/EC)	Requirement to achieve and maintain good quality, drinking, surface, groundwater and bathing waters and comply with wastewater treatment requirements.
	EU Nitrates Directive (91/676/EEC)	
	EU Groundwater Directive (1980/68/EEC)	
	EU Surface Water Directive (75/440/EEC)	
	EU Urban Waste water Directive (91/271/EEC)	
	EU bathing Water Directive (76/160/EEC)	
	EU Dangerous Substances in Water Directive (79/464/EEC)	
	EC Shellfish Waters Directive (2006/113/EEC)	Protect existing Shellfish Waters (Mulroy Bay)
National	North Western River Basin Management Plan (NIEA)	Contains river basin catchments that flow into Donegal and rivers that have catchments in Donegal.
	The Planning system and Flood Risk Management, Guidelines for Planning Authorities. 2009	Assessment and Management of Flood Risk
	The Local Government (Water Pollution) Act 1997(amended 1990)	Requirement to achieve and maintain good quality, drinking, surface and waste water.
	The Local Government (Water quality Standards for phosphorous) Regulations 1998	
	EPA Wastewater treatment for single homes; consultation draft 2007.	
Local	North Western International River Basin Management Plan (2009-2015)	Implement the requirements of the EU water framework directive to ensure good water quality by 2015
<b>Climate Change</b>		
International	European Climate Change Programme	Aims to reduce emissions
	Kyoto Protocol (1997)	Sets international targets and mechanisms for addressing climate change.
	Directive 200192/92/EC Energy performance of buildings	Aims to conserve energy
	Air Framework Directive, Directive on Air Quality Assessment and Management (Framework Directive) (1996/62/EC)	Assessment and Management of Flood Risk

	Plan, Programme or Strategy	Key consideration for County Development Plan
	Directive on national emission ceilings for certain atmospheric pollutants (2001/81/EC)	Aims to reduce emissions
National	National Climate adoption framework (Building Resilience to Climate Change) DECLG, December 2012	Aims to reduce emissions
<b>Material Assets</b>		
International	Directive 99/31/EC Landfill Directive	Sets targets for reducing waste to landfill
	Directive 2002/96/EC, The WEE Directive on waste electrical and electronic equipment.	
National	Waste Management Acts (WMA) 1996-2005	Sets National Policy
	Waste Management Regulations, 2001	
	Quarries and Ancillary Actions (Guidelines to Planning Authorities) April 2004	
	Planning and Development (Strategic Infrastructure) Bill 2006	
	Roads Acts 1961-2007	
	EPA Landfill Manuals (Draft for public Consultation)	Provides guidance on landfills
	Transport 21	Provides investment in Irelands transport system
	Design Manual for Urban Roads and Streets, Department of Transport, Tourism and Sport, 2013	Provides Guidance on street design in urban areas encouraging sustainable living by achieving a better balance between all modes of transport and road users.
	DoEHLG Policy Statement: Waste Management- Taking Stock and Moving Forward, 2004	Policy statements expanding on the National Policies.
	DoEHLG Policy Statement: Preventing and Recycling Waste, 2002	
DoEHLG Policy Statement: Waste Management, Changing our ways, 1998		
Irelands road safety Strategy 2013-2020 (RSA)		
Local	Donegal Waste Management Plan 2006-2010	Provides a framework for waste management in the County
<b>Cultural Heritage</b>		
International	Granada Convention for Protection of the Architectural Heritage of Europe 1985	
	European Convention for Protection of the Architectural Heritage of Europe 1992	
National	National Monuments Acts 1930-1994	Sets National policy governing archaeological structures and sites.
	Architectural Heritage Protection-Guidelines for Planning Authorities 2004	
	National Monuments (Amendment) Act 2004	
	National Monuments Regulations 2005	
	Planning and Development Acts 2000-2011	Sets National policy governing, inter alia, historic buildings.
	National Heritage Plan 2004	Sets National policy
Local	Donegal Heritage Plan	
<b>Landscape</b>		
International	European Landscape Convention (2000)	Requires protection and enhancement of landscapes
National	Wind Energy Guidelines 2004	Requires protection and

	Plan, Programme or Strategy	Key consideration for County Development Plan
	Draft Guidelines for Planning Authorities on Landscape and Landscape Assessment 2000	enhancement of landscapes
<b>Interrelationships/sustainable development</b>		
International	European Strategy for Sustainable Development (2006)	Identifies key priorities for sustainable development.
	6th Environmental Action Plan of the European Community (2002)	Encourages integration of environmental issues across all sectors of policy.
	The EU Environment and Health Strategy 2004-2010	Promotes sustainable development.
	Agenda 21 (1992). Action for Sustainable Development	
	'The Gothenburg Strategy' Communication from the Commission on Sustainable Europe for a Better World 2001.	
National	Guidelines for Planning Authorities on Sustainable Rural Housing 2005	Sets National policy
	Sustainable Development-a Strategy for Ireland 1997	
	Making Ireland's Development sustainable 2002	
	National Development Plan (NDP) Transforming Ireland- A better Quality of Life for All, 2007-2013	
	Sustainable Residential Development in Urban Areas December 2008	
	Sustainable Urban Housing: Design Standards for New Apartments, Guidelines for Planning Authorities, Sept 2007	
	Provision of schools and the Planning System, July 2008	
	Sustainable Rural Housing, Guidelines for Planning Authorities, 2006	
	Childcare Facilities Guidelines for Planning Authorities, June 2001	
	<b>Air Quality</b>	
International	EU 'Air Framework Directive' Directive on Air Quality Assessment and Management (Framework Directive) (1996/62/EC)	To improve Air Quality and control emissions.
	EU Directive on National Emission Ceilings for Certain Atmospheric Pollutants.	
	WHO Air Quality Guidelines (1999)	Recommends Air Quality levels and improvements
National	EPA report 'Air Quality in Ireland, 2011- key indicators of ambient air quality.	To improve Air Quality and control emissions.
<b>Planning</b>		
National	Planning and Development Acts 2000-2011	Sets National policy
	National Spatial Strategy 2004	
Local	Border Regional Planning Guidelines 2010-2022	Sets Regional Guidelines for development.
	County Donegal Development Plan 2012-2018	

## 1.6 Methodology

A scoping exercise was carried out as part of this SEA process and a scoping report was made available during the initial public consultation period of the Buncrana and Environs Development Plan Review in March 2012.

The purpose of the scoping report was to determine the range of environmental issues within the plan area and ensure that any significant environmental issues were appropriately assessed in the Plan.

The environmental report details the 'Current State of the Environment' or 'Baseline' of the Buncrana Plan area using known available data sources (including recently collated baseline information from the County Donegal Development Plan 2012-2018, Appendix C, Environmental Report. Geographical Information Systems (GIS) were used heavily in both the identification and mapping of the various layers of environmental vulnerabilities and also as a tool in assessing the cumulative effect of potential developments.

The baseline environmental data and indicators were considered at all times during the drafting of the policies of the Plan and zonings for the Development Plan, and in particular the location and conservation status of Natura 2000 sites, shellfish waters and the requirements of the NWIRBD Plan. Strategic Environmental Objectives were drafted following the collation of the baseline data and are based on the particular environmental issues affecting the Buncrana Plan area whilst also complying with the requirements of Schedule 2(B) of the Planning and Development Regulations 2001, and the SEA Guidelines, 2004.

The SEA process shaped the drafting of the entire Plan and Table 28 outlines how the environmental issues raised throughout the SEA process were incorporated into the Plan as objectives, policies or otherwise. The testing Matrix contained within Table 27 of this report assesses each of the objectives and policies of the Plan against each of the 24 Strategic Environmental Objectives (Table 26). Where a potential conflict arose the emerging policies were re-assessed and on occasion modified and changed.

### Assessment of Environmental Vulnerabilities

Environmental Vulnerabilities within the Plan area were identified during the gathering of baseline data for the environmental report and those that have the data available spatially have been mapped individually and also compiled into a 'Map of Vulnerabilities' (Map 1 herein) as illustrated below. A system of mapping the vulnerabilities has been developed within the Council and this data has been used in a number of previous plans/ projects including the County Development Plan 2012-2018. The data for the Buncrana plan area has been extracted from this system that consists of a total of 39 layers of environmental data overlaid spatially and weighted in order to show an output range of environmental vulnerability ranging from High (red) to low (blue). The Environmental Vulnerabilities GIS mapping displays environmental data on layers and enables easy identification of areas of high vulnerability that have been considered through the drafting of policies, and as a tool in identifying areas that may be subject to mitigation.

A weighting system was applied to each layer through the GIS system in order to arrive at a value of vulnerabilities for the entire Plan area. The sequential weightings system gives International datasets (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 as detailed below:

**Table 6: Weighting System in respect of Environmental Vulnerabilities**

Weighting Applied	Environmental Vulnerability Factor
15	Natura 2000 sites (SACs and SPAs) and Sites of Freshwater Pearl Mussel Population. (International)
10	NHA, pNHA, Ramsar Sites, Nature Reserves, National Parks, Broadleafed woodland, RPS, Monuments in State care, Sites and Monuments Record, Archaeological monuments, Archaeological complexes, EHSA, Views and prospects, Geological sites, Aggregate Potential, Bathing Water Quality, Blue Flag Beaches, Green Coast Awards, Aquifers, Source Protection Areas, Abstraction Points, Flood Points, Benefiting lands, FPM Catchments, Unsewered Properties, Walking routes, Blue Stack Way, IPPC licences, EPA Waste licences, NWIRBD coastal, Transitional, lakes and river bodies and risk and Shellfish catchments.
5	15km buffer areas around Natura 2000 sites.

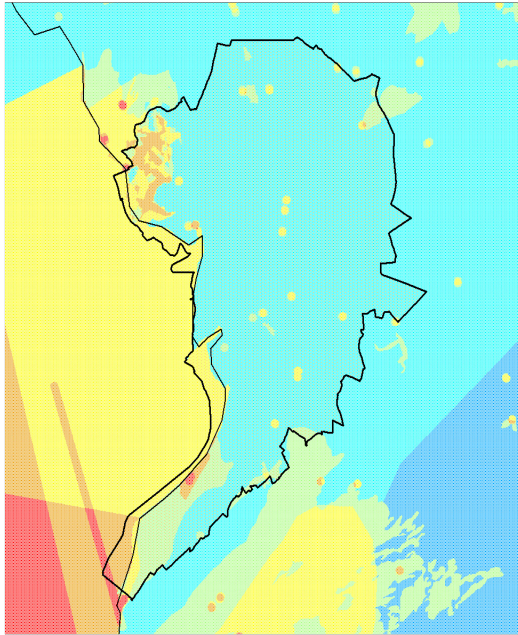
The range of vulnerability consists of the layering of the vulnerability factors. The vulnerability value for an area is the sum of the ratings values that overlap that area. For example, where 2 datasets with a rating value of 10 each overlap, the resulting overlapping area will have a final vulnerability of 20. An overlap value can also be calculated, this indicates the number of datasets affecting a specific area, for example where a site has 5 different layers of vulnerability, the overlap value will be 5. The table below sets out the range of vulnerabilities used in the mapping.

**Table 7: Range of Vulnerabilities**

Vulnerability	Category
0	No Vulnerability (i.e. areas without any environmental vulnerabilities)
<5	Low Vulnerability
5 - 10	Moderate Vulnerability
15 - 20	Elevated Vulnerability
25 - 30	High Vulnerability
35 - 40	Extreme Vulnerability
>45	Acute Vulnerability

This Vulnerabilities Map shows where the most environmentally sensitive areas of the Plan area (red) to the least environmentally sensitive (blue). There are certain limitations and an element of subjectivity to the vulnerabilities mapping developed, however the exercise was fundamental to assessing potential conflicts of the Plan with environmental vulnerabilities.

**Map 1: Vulnerability mapping within the Buncrana and Environs Development Plan Area**



## 2.0 Consultation

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As part of the scoping exercise a scoping report was prepared and circulated to the following statutory and other public bodies:

- Environmental Protection Agency (EPA).
- Department of Environment, Heritage and Local Government (DEHLG).
- Department of Communications, Energy and Natural Resources (DCENR).
- Department of Arts, Culture and the Gaeltacht.
- Department of Agriculture, Fisheries and Food.
- Loughs Agency, Derry.
- Leitrim County Council.

### Submission from EPA

The EPA made a scoping submission on 24<sup>th</sup> April 2012 stating that key influential plans are taken into account and integrated within the SEA process including the following:

- 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 and associated characterization Report.
- Offshore Renewable Energy Development Plan.
- Grid 25 Implementation programme.

The EPA also referred to the updated SEA Regulations/Circular which should be referenced and integrated into the Plan and SEA process and recommended the following specific comments be considered:

- 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.

#### **Submission from the Department of Arts, Heritage and the Gaeltacht**

A submission was received from the Department of Arts, Heritage and Gaeltacht on 24<sup>th</sup> May 2012, highlighting the location of Lough Swilly SAC and Lough Swilly SPA within the plan boundary and makes recommendations as summarized below:

- Plan should include a natural heritage section
- Adherence with the policies and objectives of the County Donegal Development Plan 2012-2018.
- The Department should be fully consulted regarding assessments to address possible environmental impacts in relation to designated sites resulting from the Development Plan.
- Maps and sites synopsis of designated and proposed sites should be included in the appendices to the plan.
- Plan should recognize that protected species also occur outside designated sites and should take note of the 2020 biodiversity target of the Nagoya Convention on Biological Diversity, the National Biodiversity Plan and the need to protect the County's Biodiversity.
- Plan should recognize the importance of linear features such as hedgerows and waterways.
- Policy needed to protect against the accidental introduction of invasive species, e.g. Japanese Knotweed and giant Hogweed.
- Sets out the scope of the SEA for biodiversity, flora and fauna.
- Biodiversity environmental objectives of the SEA should cover habitats and species within and outside designated sites.
- Water quality environmental objectives should consider requirements of target species such as salmon.
- Plan should include and objective and policies for archaeological heritage, including underwater archaeology.

There were no further submissions made on foot of the Scoping Report.

#### **Transboundary Consultation**

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 and Development Act 2000 (as amended), the Minister of the Environment, Community and Local Government has been notified of the Councils views.

### **3.0 Appropriate Assessment**

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An Appropriate Assessment of the Buncrana and Environs Development Plan was carried out pursuant to Article 6 of the Habitats Directive and Section 177T (1) of the Planning and Development Acts 2000 (as amended).

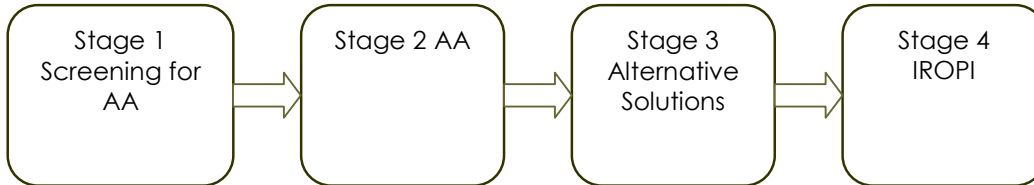
The EU Habitats Directive (92/43/EEC) aimed to create a network of protected wildlife sites in Europe through the designation of Special Areas of Conservation and Special Protection Areas, collectively known as Natura 2000 sites. The Directive was transposed into Irish law by

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the European Communities (Natural Habitats) Regulations 1997, and more recently by amendment to the Planning and Development Act 2000. It is a requirement of the Directive and legislation to carry out an Appropriate Assessment (Natura Impact Report) on any plan or Project that is likely to have a significant effect on the conservation status of the site.

DEHLG issued "Appropriate Assessment of Plans and Projects in Ireland; Guidance for Planning Authorities" in 2009 provides guidance and sets out the 4 steps in the Appropriate Assessment Process, as detailed below.

**Figure 2: The 4 stages in the Appropriate Assessment**



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

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

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

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

### **Appropriate Assessment**

A Natura Impact Report has been prepared in parallel with this document. This Report is being considered in conjunction with the SEA process and the outcomes will inform the making of the Plan.

### **Stage One: Screening**

Screening for Appropriate Assessment on the implications of the Buncrana and Environs Development Plan 2014-2020 on Natura 2000 sites in accordance with the requirements of Article 6 of the Habitats Directive was carried out. It examined the likely effects of the Plan on Natura 2000 sites in the Plan area (SPA 004075 and SAC 000166) and within a 15km buffer of the Plan boundary and considered whether it could be objectively concluded that these sites would not be significantly impacted upon.

The Screening report concluded that an appropriate assessment would be required having regard to the fact that 2 Natura 2000 sites are located within and about the plan area and the potential for development over the 6 year plan period that could impact on the integrity

of the sites, that an Appropriate Assessment of the Plan was required and that to proceed to Stage 2.

**Stage Two – Appropriate Assessment (Natura Impact Report)**

All Natura 2000 sites in-situ and ex-situ (within 15km of the Buncrana Plan area) were identified and a Scientific Assessment of the potential risks and impacts of the objectives and policies of the Plan on the Natura Sites was carried out. Where potential risks and impacts were identified, the policies and objectives were amended or mitigating measures proposed and have been included within the text of the Plan.

**Stage Three and Stage Four IROPI**

The Appropriate Assessment on the Plan involved stages 1 and 2 of the Appropriate Assessment process only and there was no requirement to proceed to stages 3 and 4.

The Core Strategy sets out a population growth of 1,381 for Buncrana resulting in a housing land requirement of 62 hectares. Preparation of the appropriate assessment involved a review of conservation objectives and threats to site integrity for the range of Natura 2000 sites in the Plan area, should these lands be developed, and against all the other objectives and policies contained within the Plan. The Appropriate Assessment also informed the zonings and zoning objectives through the plan making process.

**Appropriate Assessment Conclusion**

The Natura Impact Report concluded a finding of No Significant Effects following the completion of stage 2 of the process. Any potential impact on the Natura 2000 network has been mitigated against through amendments of existing policies and objectives, and the addition of a number of policies. The determination of the Appropriate Assessment is that there is no requirement to proceed to stage 3 of the AA as there is no significant detrimental effect identified as the result of implementation of the Plan to the integrity of any European Site.

**Table 8: Mitigation arising from Appropriate Assessment**

Section	Objective, Policy or reference in the Plan	Additional Policy/Objective or reference Added to the Draft Development Plan
<b>Chapter 5 Built and Natural Heritage</b>	<b>New Policy NH-P-1</b>	<b>NH-P-1</b> It is policy of the Councils to ensure development proposals do not damage or destroy any sites of international or national importance, designated for their wildlife/habitat significance.
<b>Chapter 5 Built and Natural Heritage</b>	<b>New Policy NH-P-2</b>	<b>NH-P-2</b> It is the policy of the Councils to ensure the protection of Natura 2000 sites in accordance with Article 6 of the Habitats Directive (92/43/EEC) and to have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of these designated areas including areas designated as such during the lifetime of the plan.

Section	Objective, Policy or reference in the Plan	Additional Policy/Objective or reference Added to the Draft Development Plan
Chapter 5 Built and Natural Heritage	New Policy NH-P-3	<b>NH-P-3</b> 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 that fall within their catchment.
Chapter 5 Built and Natural Heritage	New Policy NH-P-4	<b>NH-P-4</b> It is the policy of the Councils to safeguard and enhance the local landscape and natural environment, including the seascape, by ensuring any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of the area.
Chapter 5 Built and Natural Heritage	New Policy NH-P-5	<b>NH-P-5</b> It is the policy of the Councils to take into consideration any Landscape Character Assessment that is carried out for the County.
Chapter 5 Built and Natural Heritage	New Policy NH-P-6	<b>NH-P-6</b> It is the policy of the Councils to preserve the views and prospects of 'Special Amenity Value and Interest' as shown in the Land Use Zoning Map 1A.
Chapter 5 Built and Natural Heritage	New Policy NH-P-7	<b>NH-P-7</b> It is the policy of the Councils to require the consideration of the impact of potential development on habitats of natural value that are key features of the area's ecological network and to incorporate appropriate mitigating biodiversity measures into development proposals.
Chapter 5 Built and Natural Heritage	New policy NH-P-8	<b>NH-P-8:</b> It is the policy of the Councils to retain and protect significant stands of existing trees/hedgerows/woodlands, and seek increased planting of native trees, where appropriate, in new developments.
Chapter 5 Built and Natural Heritage	New Policy NH-P-9	<b>NH-P-9</b> It is the policy of the Councils to seek protection of stone wall boundaries where they are shown to play a significant heritage role. Where the demolition of such stone walls is unavoidable, the reinstatement of stone walls at revised location/set back within site using agreed local materials and techniques will be required.
Chapter 5 Built and Natural Heritage	New Policy NH-P-10	<b>NH-P-10</b> It is the policy of the Councils to conserve and protect the lands identified as 'Coastal Protection Area' on Map 1A, Land use Zoning map, with

Section	Objective, Policy or reference in the Plan	Additional Policy/Objective or reference Added to the Draft Development Plan
		<p>the exception of appropriate agricultural or recreational development. Proposals for agricultural or recreational development within the identified area will be considered having regard to all material planning considerations, all other relevant policies of the Plan, National/ Regional Guidelines and having regard to all environmental and conservation designations.</p>
<p><b>Chapter 5 Built and Natural Heritage</b></p>	<p><b>New Policy NH-P-11</b></p>	<p><b>NH-P-11</b> It is a policy of the Councils to protect 'County Geological Sites' (CGS). Accordingly the Councils will adopt a precautionary approach to development proposals with the potential to impact upon a CGS. Proposals should be accompanied by a detailed report from a competent person setting out the potential impact to ensure that an informed decision can be made. Where significant harm to the CGS is deemed likely, planning permission will not be granted unless there are overriding considerations of public importance to the County.</p>
<p><b>Chapter 3 Economic Development</b></p>	<p><b>Reword Objective E-O-9</b></p>	<p><b>E-O-9</b> 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.</p>
<p><b>Chapter 3 Economic Development</b></p>	<p><b>Reword Policy E-P-4</b></p>	<p><b>E-P-4</b> It is the policy of the Councils to support the appropriate development of Business Park and Incubator units for Small and Medium Enterprises subject to all material planning considerations, all other relevant policies of the Plan and subject to Article 6 of the Habitats Directive (where applicable).</p>
<p><b>Chapter 3 Economic Development</b></p>	<p><b>Reword Policy E-P-27</b></p>	<p><b>E-P-27</b> It is the policy of the Councils to encourage the development of amenity walks/cycleways along the indicative routes as identified on the Land Use Zoned map 1A and recorded within Table 7, subject to all material planning considerations and to compliance with Article 6 of the</p>

Section	Objective, Policy or reference in the Plan	Additional Policy/Objective or reference Added to the Draft Development Plan
		Habitats Directive (where applicable).
<p><b>Chapter 4 Retail</b></p>	<p><b>Reword Policy R-P-2</b></p>	<p><b>R-P-2</b> It is the policy of the Councils to ensure that development proposals within the town centre and built up urban areas:</p> <p>(a) Provide for distinctive buildings of a high architectural quality, which contribute to a distinct sense of place and a quality public realm.</p> <p>(b) Create strong street frontage by either, adhering to the established building line in the immediate area or establish a new building line immediately adjoining the public road where a reasonable opportunity exists to do so. A greater setback will be permitted where the development would provide for the creation of a high quality public realm with appropriate design elements such as landscaping, street furniture.</p> <p>(c) Respect, where appropriate, the context of the adjoining buildings, adjacent streetscape or buildings in the immediate area, in terms of design, height, scale and mass etc.</p> <p>(d) Respect the style, architectural detailing (in terms of design/arrangement of fenestration, facia/soffit treatment, general finishes and materials), eaves height, roof pitch, roof line, and overall building form and height, as appropriate, in areas characterised by traditional vernacular or high quality streetscape.</p> <p>(e) Create buildings of a human scale by providing for a fine grain of development, in terms of overall scale, fenestration, size/proportions, signage and detailing and appropriate breaking of building forms along street frontages into narrow horizontal distances.</p> <p>(f) Promote, where appropriate, visual interest through modulation and detailing of architectural elements (e.g. detailing/treatments of eaves, windows, frontages, slight variations in roof lines, setback).</p>

Section	Objective, Policy or reference in the Plan	Additional Policy/Objective or reference Added to the Draft Development Plan
		<p>(g) Utilise, where appropriate adaptable and accessible design on the ground floor to ensure their future re-use for alternative functions (e.g. retail/commercial).</p> <p>(h) Avoid the use of industrial type cladding, or the glazing of extensive area of the proposed development.</p> <p>(i) Give effect to the 12 Design Criteria set out in the Urban Design Manual – A Best Practice Guide (DoEHLG, 2009).</p> <p>(J) Appropriate consideration of environmental assets and environmental and conservation designations.</p>
<b>Chapter 4 Retail</b>	<b>Reword Policy R-P-5</b>	<b>R-P-5</b> It is the policy of the Council to encourage and facilitate the re-use and redevelopment of vacant or derelict lands or buildings within the town centre for a variety of appropriate mixed uses subject to all material planning considerations and to compliance with Article 6 of the Habitats Directive (where applicable).
<b>Chapter 4 Retail</b>	<b>Reword Policy R-P-6</b>	<b>R-P-6</b> It is the policy of the Council's to seek to provide high quality public realm and to improve pedestrian, cyclist and public transport access subject to all material planning considerations and to compliance with Article 6 of the Habitats Directive (where applicable).
<b>Chapter 4 Retail</b>	<b>Reword Policy R-P-8</b>	<p><b>R-P-8</b> It is the policy of the Councils to seek to secure the vitality and viability of the retail function of the town centre. In doing so, the Councils shall implement the following measures:</p> <p>(a) To make provision for additional public car parking at alternative suitable locations that may become available over the life of this plan.</p> <p>(b) To review traffic management measures, to improve circulation within the town centre.</p> <p>(c) To consider opportunities that can underpin the role of Market Square, to act as a shared space that delivers strong linkage between the Main Street and the new retail quarter at Ardaravan Square.</p>

Section	Objective, Policy or reference in the Plan	Additional Policy/Objective or reference Added to the Draft Development Plan
		<p>(d) To encourage the appropriate regeneration and reuse of vacant, derelict and rundown buildings.</p> <p>(e) To pursue completion of the Inner Relief Road to relieve congestion in the town centre and to pursue the preferred route of the Outer Relief Road.</p> <p>(f) To encourage the development of strong street frontage along the Inner Relief Road.</p> <p>(g) To encourage appropriate proposals for alternative transport options within the town centre including opportunities for public transport and for implementation of dedicated cycle and pedestrian pathways.</p> <p>(h) To explore opportunities to establish a programme to 'green' the town centre by means of protection of existing trees, hedgerows, green spaces together with new planting to augment and complement existing biodiversity.</p> <p>(i) To protect archaeological heritage and buildings of cultural or architectural heritage.</p> <p>(j) To ensure compliance with Article 6 of the Habitats Directive.</p>
<b>Chapter 5 Built and Natural Heritage</b>	<b>Reword Policy BH-P-6</b>	<b>BH-P-6</b> It is the policy of the Council's to promote the appropriate reuse of derelict and under used urban land subject to compliance with Article 6 of the Habitats Directive (where applicable).
<b>Chapter 6 Infrastructure</b>	<b>Reword Policy WM-P-1</b>	<b>WM-P-1</b> It is the policy of the Councils to support and promote the implementation of the County Council's Waste Management Plan, subject to compliance with Article 6 of the Habitats Directive (where applicable).
<b>Chapter 6 infrastructure</b>	<b>Reword Policy TC-P-1</b>	<b>TC-P-1</b> It is the policy of the Councils to support and facilitate the development and delivery of a sustainable telecommunications network within Buncrana and its



Section	Objective, Policy or reference in the Plan	Additional Policy/Objective or reference Added to the Draft Development Plan
		environs through a range of telecommunications systems that are developed having regard to natural and built heritage, environmental considerations and, where applicable, subject to compliance with Article 6 of the Habitats Directive.
<b>Chapter 9 Housing</b>	<b>Reword Policy H-P-7</b>	<b>H-P-7</b> It is the policy of the Council to guide development in a sequential manner, outwards from the core area in order to maximise the utility of existing and future infrastructure provision, promote the achievement of sustainability, avoid 'leap-frogging' to more remote areas and to make better use of under utilised land subject to compliance with Article 6 of the Habitats Directive (where applicable).
<b>Chapter 9 Housing</b>	<b>Reword Policy H-P-13</b>	<b>H-P-13</b> Direct pedestrian and cycle linkages shall be provided within proposals for new residential developments interconnecting with central amenity areas, adjoining neighbourhood developments and neighbourhood facilities subject to compliance with Article 6 of the Habitats Directive. Linkages shall be provided in addition to the primary access to the development and shall be designed to maximise passive surveillance from surrounding properties, be well lit and maintained and the materials and finish shall be of a high quality. Linkages that follow indirect routes and/or to the rear of properties shall normally not be considered acceptable.
<b>Chapter 9 Housing</b>	<b>Reword Policy H-P-29</b>	<b>H-P-29</b> It is the policy of the Councils to facilitate an appropriate provision of one-off housing in 'Agricultural/Rural' areas where the applicant can demonstrate that they need a new house at this location and can provide evidence that they, or their parents, have resided in those areas for a period of at least 7 years. All proposals shall be subject to all relevant material considerations, relevant policies of the Buncrana & Environs Development Plan 2014- 2018,

Section	Objective, Policy or reference in the Plan	Additional Policy/Objective or reference Added to the Draft Development Plan
		other Regional and National guidance and relevant Environmental designations.
<b>Chapter 10 Flooding</b>	<b>Reword Policy F-P-2</b>	<b>F-P-2</b> It is the policy of the Councils to manage development proposals within floodplains and other areas at risk from flooding in a sequential manner based on avoidance, reduction and then mitigation subject to compliance with Article 6 of the Habitats Directive.
<b>Chapter 10 Flooding</b>	<b>Reword Policy F-P-3</b>	<b>F-P-3</b> It is the policy of the Councils to assess carefully development proposals, which may exacerbate flood risk elsewhere with a view to adopting the same sequential approach for such schemes subject to compliance with Article 6 of the Habitats Directive.
<b>Chapter 10 Flooding</b>	<b>Reword Policy F-P-8</b>	<b>F-P-8</b> It is the policy of the Councils to promote the use of Sustainable Drainage Systems (SuDS), flood attenuation areas, the controlled release of surface waters and use of open spaces and semi permeable hard surfaces for appropriate development proposals subject to compliance with Article 6 of the Habitats Directive.
<b>Chapter 10 Flooding</b>	<b>Reword Policy F-P-9</b>	<b>F-P-9</b> It is the policy of the Councils to secure and promote in appropriate circumstances the natural role of flood plains as a form of flood attenuation. Agricultural areas and vacant open spaces within floodplains may be considered appropriate for development as formal amenity/recreational areas and public parks, as they also serve as natural flood catchment areas subject to compliance with Article 6 of the Habitats Directive.

## 4.0 Alternative Approaches to the Plan

The Buncrana and Environs Development Plan 2014-2020 sets out the Councils land use zonings, objectives and policies for the overall development of the town up to 2020 and beyond to a horizon year of 2030, and is set out as detailed below.

Buncrana and Environs Development Plan 2014-2020

- Volume 1: Core document
- Appendix 1: Housing Strategy
- Appendix 2: Environmental Report
- Map 1(A): Land Use Zoning (A0)
- Map 1(B): Land Use Zoning (A3 insert)
- Map 2: Built and Natural Heritage (A0)

The development framework, objectives and policies for the Buncrana and Environs Development Plan area are set out within the 11 chapters in Volume 1 of the plan. The plan incorporates a Core Strategy (chapter 2) which is guided by national and regional development objectives set out in the National Spatial Strategy 2002-2020, the Border Regional Planning Guidelines, 2010-2022 and the County Donegal Development Plan 2012-2018 and which provides for a population growth of 1381 for Buncrana.

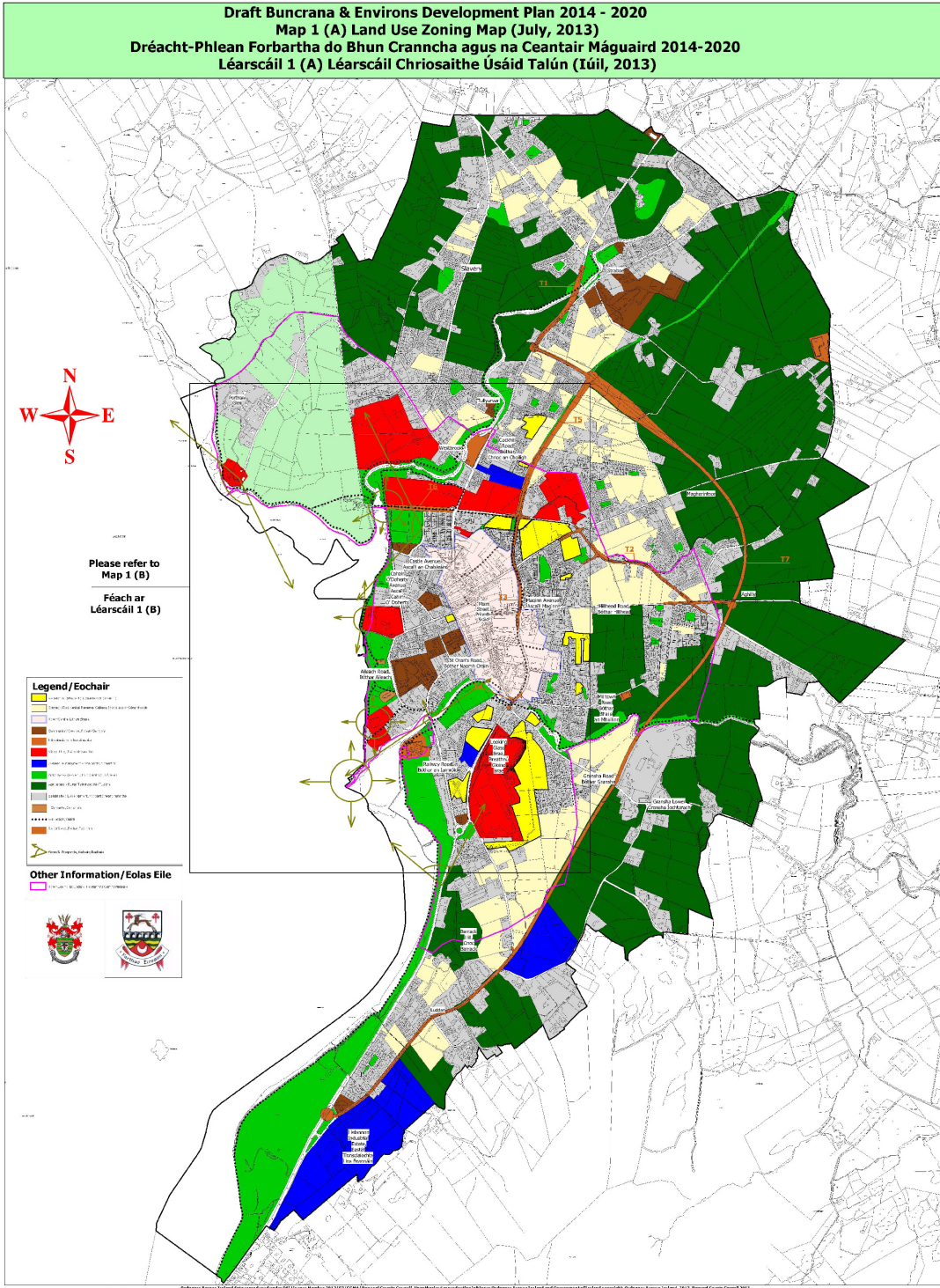
Buncrana is positioned within tier 2 of this hierarchy in a supporting role to the promotion of the Linked Gateway of Letterkenny (linked with Derry) and plays an important role as a self sufficient service centre within the County. Table 7 of the County Development Plan indicates a population growth of 1,381 persons for Buncrana, which equates to a need for 493 housing units and a resulting Housing Land Requirement of 62 hectares. The implementation of distributing this population is delivered through the primary residential zoning on the land use zoning map and detailed further within the core document of the Buncrana & Environs Development Plan 2014- 2020.

The remaining chapters contained within the Core document are as detailed in figure 1 below and the land use zonings and zoning objectives are as detailed in figures 2 and 3 below respectively.

**Figure 3: Contents of Core Document of the Buncrana and Environs Development Plan**

Chapter 1	Introduction
Chapter 2	Core Strategy
Chapter 3	Economic Development
Chapter 4	Retail
Chapter 5	Built and Natural Heritage
Chapter 6	Infrastructure
Chapter 7	Community, Education and Health
Chapter 8	Childcare Strategy
Chapter 9	Housing
Chapter 10	Flooding
Chapter 11	Development and Technical Standards

Figure 4: Land Use Zoning Map



**Figure 5: Land Use Zoning Objectives (Refer to Land Use Zoning Map)**

<b>Zone</b>	<b>Objective</b>
Residential (Phase 1)	To reserve land primarily for residential development as guided within the Housing Land Requirement of the Core Strategy.
Strategic Residential Reserve	To reserve lands as Strategic Residential Reserve, that may be considered for residential growth over the longer-term period (i.e. beyond the life of this plan).
Town Centre	To reserve lands for a diverse mix of commercial, retail, office, cultural, leisure/entertainment, residential and other uses appropriate to the town centre and to promote the Town Centre as the primary retail location thereby enhancing vitality and viability.
Community/ Service	To reserve appropriate land primarily for community, educational, institutional, health, cultural, recreational and amenity purposes.
Amenity/ Recreation	To conserve and enhance lands solely for formal and informal open spaces and amenity areas and to make provision for new recreation facilities.
Mixed Use/ Tourism	To reserve strategic lands/sites for a variety of appropriate mixed-use developments, including landmark buildings/tourism/cultural, educational, community and residential uses, provided that they are compatible with the wider area whilst recognising built, natural and habitat features of importance that are specific to the site.
General Employment	To reserve appropriate land for commercial, industrial and non-convenience retail purposes (in accordance with the Sequential Approach).
Established Development	To ensure the protection of the character and biodiversity of established areas and to allow for new development that is both appropriate and orderly in the context of the established area.
Infrastructure	To reserve land for the purposes of infrastructure and utilities.
Coastal Conservation Area	To conserve and protect the scenic landscape character of these coastal lands, situated within the vicinity of Buncrana Castle and Swan Park.
Agriculture/Rural	To provide for a spatial development pattern that is sustainable and related in form and scale to the level of existing physical and social infrastructure in the area and that can be integrated and absorbed into the landscape.

### Planning Context

National Spatial Strategy 2002 (NSS): Sets the planning framework for the country (2002- 2020) designed to achieve a sustainable balance of social, economic and physical development and population growth across the country. Letterkenny is designated as a linked gateway with Derry.

Border Regional Planning Guidelines 2010 (RPGs): Sets the planning framework for the border region, consistent with the requirements of the NSS, so as to provide a long-term strategic planning framework for the region. The Guidelines provide for the integration of spatial planning, the economy and infrastructure provision. The Guidelines identify a total population growth for the entire of the County, of 12,927 persons to 2016. Of this, the RPG's indicate that 2,700 population growth shall occur in the Letterkenny Gateway and that the remaining share of 10,227 persons shall occur within the rest of the County.

County Donegal Development Plan 2012-2018: Sets a population growth target for the Buncrana Plan area of 1,381 persons, developed as part of a growth strategy for the County and incorporating the recommendations and targets set out in the Border Regional Planning Guidelines 2010.

**Alternatives:**

The following are the three alternatives considered:

1. Continuation of existing policy framework.
2. Incremental growth/consolidation and the continuation of the existing environmental protection.
3. Incremental growth/consolidation and strengthen environmental protection.

The following paragraphs set out the nature of each alternative together with the key characteristics of the alternative and the likely impacts that will arise.

**Strategic Development Options Alternatives:**

Working within the above figures there are 3 strategic alternative development options now considered. In considering the appropriateness of the alternatives, focus is on the delivery of a sustainable strategy that is consistent with the hierarchy of plans.

**Alternatives:**

The following are the three alternatives considered:

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

The following paragraphs set out the nature of each alternative together with the key characteristics of the alternative and the likely impacts that will arise.

**Strategic Alternative 1: Continuation of existing policy framework**

This alternative would comprise the continuation of the zoning framework adopted in the Buncrana 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'.

The key principles of this strategic alternative are as follows:

1. Identification of town centre and expanded area at Ardaravan Square including retail strategy requiring sequential approach to retail proposals supported by the identification of 'opportunity' sites outside the town centre the regeneration of which is encouraged.
2. A proportion of Porthaw, Buncrana Castle and its environs and coastal lands in this area would be identified to ensure that no further development takes place.
3. Identification and prioritisation of infrastructural improvements.
4. Identification of 'Primarily Residential' lands on coastal side of outer relief road.
5. Identification of 'Strategic Residential Reserve' lands on eastern side of outer relief road to fulfil long term housing needs beyond the life of the plan.
6. Identification of lands on eastern side of outer relief route, and lands at Barrack Hill, as 'Local Environment' providing for one off housing where the landscape has the capacity to absorb the development proposed.

7. Support and protect existing economic base by identifying economic opportunities at Luddan and Ballymacarry, along the key strategic transport node connecting the R238 and route of outer and inner relief roads and at lands immediately north of the town centre along inner relief road and Cockhill Road.
8. Continued protection of 3 Protected Structures and identification of a 'Special Character Area' to seek to protect the built heritage.

Having regard to the foregoing, this alternative would result in the continuation of existing patterns of development and would therefore see the population growth continue to weaken in the urban core of Buncrana and grow at a high rate in the environs of the town. It is considered that this approach would not be consistent with the Border Regional Guidelines 2010 and the County Development Plan 2012- 2018 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.

### **Strategic Alternative 2: Incremental growth/consolidation and continuation of the environmental protection**

This alternative would reduce the quantum of land zoned in the Buncrana 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, Buncrana Castle and its environs and coastal lands to ensure that no further development takes place.

The key principles of this strategic alternative are as follows:

1. To ensure that the quantum of housing land supply does not exceed the housing lands requirement as set out in the County Development Plan 2012-2018 Core Strategy.
2. Identification of 'Strategic Residential Reserve' outside the town centre to fulfil long term housing needs beyond the lifetime of the plan.
3. Consolidation of urban footprint.
4. Encouraging growth of the town in a sequential manner outwards from the core so as to make the best use of planned infrastructure.
5. Same level of environmental protection of the Development Plan 2008-2014 which identified a proportion of Porthaw, Buncrana Castle and its environs and coastal lands in this area would be identified to ensure that no further development takes place.
6. Support and protect the existing economic base of Buncrana to ensure that this Tier 2 settlement is a key centre for economic growth as set out in the CDP 2012-2018 Core Strategy.
7. Identify and prioritise infrastructural improvements to ensure the growth of Buncrana as a tier 2 settlement in line with the CDP 2012-2018 Core Strategy.
8. Identification of town centre and expanded area at Ardaravan Square including retail strategy requiring sequential approach to retail proposals.

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.

### **Strategic Alternative 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.

The key principles of this strategic alternative are as follows:

1. To ensure that the quantum of housing land is consistent with the housing lands requirement as set out in the County Development Plan 2012-2018 Core Strategy.
2. Identification of an appropriate quantum of 'Strategic Residential Reserve' outside the town centre to fulfil long term housing needs beyond the lifetime of the plan.
3. Consolidation of urban footprint.
4. Encouraging growth of the town in a sequential manner outwards from the core so as to make the best use of planned infrastructure.
5. High level of environmental protection in line with the Habitats Directive and to support the CDP 2012-2018 core strategy of concentrating development in the core of the town.
6. Support and protect the existing economic base of Buncrana to ensure that Buncrana as a tier 2 settlement is a key centre for economic growth as set out in the CDP 2012-2018 Core Strategy.
7. Identify and prioritise infrastructural improvements to ensure the growth of Buncrana as a tier 2 settlement in line with the CDP 2012-2018 Core Strategy.
8. Identification of town centre and expanded area at Ardaravan Square including retail strategy requiring sequential approach to retail proposals.

Having regard to the foregoing, 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. In terms of environmental issues the conservation of biodiversity has been strengthened and expanded in recent years and this alternative reflects this emphasis and in particular is compatible with Article 6 of the Habitats Directive.

The 3 Strategic Alternatives were tested against the Strategic Environmental objectives as set out in table 9, below. Strategic Alternative 3 was most compatible with the Strategic environmental objectives as well as being the most compatible with the strategy set out in the Regional Planning Guidelines 2010 and the CDP 2012-2018. This Strategy provides the framework for deciding on the scale, phasing and location of lands to be zoned for primarily 'Residential' use and for a mixture of residential and other uses, having regard to existing services and planned investment over the coming years. It also identifies an appropriate quantum of land for future potential residential use beyond the lifetime of this plan, which are zoned as 'Strategic Residential Reserve'. This approach provides 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. It also identifies potential residential lands reserved for delivery through future plan reviews.

As a consequence of introducing this Core Strategy, there will be a significant reduction in the area of lands zoned for 'Primarily Residential' use, compared to the provisions of the 2008 – 2014 Development Plan. In addition, the quantum of lands zoned as 'Strategic Residential Reserve' shall be reduced to reflect population growth trends over the plan horizon to 2030 and the release of these lands shall be considered as part of subsequent plan reviews, subject to housing need, availability of capacity in infrastructure, development is sequential and that it accords with the Government's Urban Design Manual 2009.

**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.

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
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	
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
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

**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 whilst providing the necessary environmental protection in accordance with Strategic Environmental Assessment and the Appropriate Assessment.

## 5.0 Current State of the Environment

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Buncrana is a coastal town located on the west of the Inishowen peninsula on the shores of Lough Swilly. Buncrana has a population of 6,839<sup>1</sup> making it the second largest town in County Donegal after Letterkenny. The plan has an area of 1248 hectares and a substantial coastline of 6.963km along the shore of Lough Swilly. Two rivers run through the plan area, the Crana River runs a length of 3.467km through the plan area and the Mill River some 2.657 km before flowing out into Lough Swilly.

The town traditionally had a strong textile industry from the 19<sup>th</sup> Century until recently and now performs as an important service centre in the County and is recognised as a popular tourist destination. Buncrana is accessed by the R238 from Derry and in recent years a Car Ferry has linked the town with Rathmullan, located across Lough Swilly.

Buncrana is an ecologically rich historic town with a plethora of natural and man-made environments and the full range of vulnerabilities shall be considered in this report. This chapter sets out the existing available baseline data for the Plan area that have contributed to configuring the Strategic Environmental Objectives as set out in section 9. The baseline data combined with the Strategic Environmental Objectives shall provide an environmental picture of the town that all emerging objectives and policies of the plan must be assessed and evaluated against.

### 5.1 Biodiversity, Flora and Fauna

The conservation of biodiversity in Ireland has been strengthened and expanded by EU law, most notably by the EU Birds Directive and EU Habitats Directive and also by the EIA Directive (85/337/EEC).

The Habitats Directive was transposed into Irish national law in 1997. The European Union (Natural Habitats) Regulations, SI 94/1997 represent a fundamental shift in nature conservation policy and law. These Regulations have since been amended by SI 233/1998 & SI 378/2005. The requirements in respect to the Habitats Directive are dealt with in a separate section of this report.

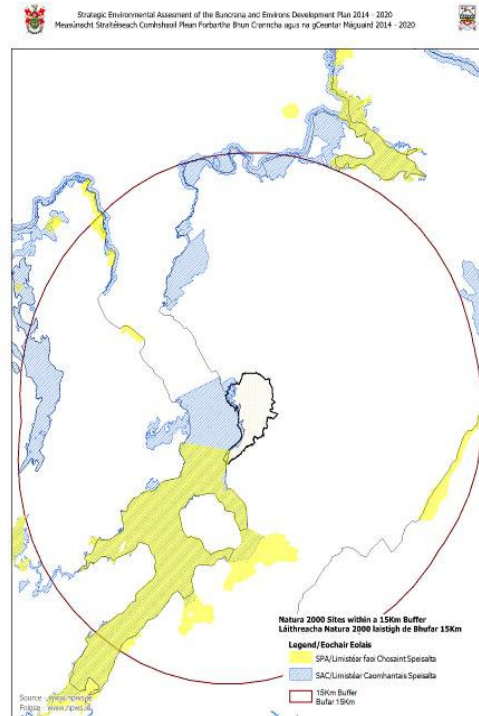
The EU Birds Directive 79/409/EEC on the conservation of wild birds, is the EU's oldest piece of nature legislation and one of the most important, creating a comprehensive scheme of protection for all wild bird species naturally occurring in the Union. The Directive places great emphasis on the protection of habitats for endangered as well as migratory species (listed in Annex I), especially through the establishment of a coherent network of Special Protection Areas (SPAs) comprising all the most suitable territories for these species. Since 1994 all SPAs form an integral part of the NATURA 2000 ecological network, along with SAC's.

There are 2 Natura 2000 sites within the plan area, namely Lough Swilly Special Protection Area, 004075 and Lough Swilly Special Area of Conservation, 002287. These sites are listed in table 11 overleaf and shown on map no. 2. There are 121.2 hectares of SAC designated lands and 22.27 hectares of SPA designated which overlap in parts but which in total comprise 143.47 hectares of Natura 2000 sites, or 10.3% of all land coverage within the plan area, compared to 12.3% within the County as a whole. The Natura 2000 sites and a 15km buffer are illustrated on map no. 2 overleaf.

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<sup>1</sup> [www.cso.ie](http://www.cso.ie)

Map 2: Natura 2000 sites (SACs and SPAs) within the Buncrana Plan Area



### Lough Swilly Special Area of Conservation (002287)

Lough Swilly Special Area of Conservation (002287) extends from below Letterkenny to north of Buncrana, is estuarine in character, with shallow water and intertidal sand and mud flats being the dominant habitats. The main rivers flowing into the site are the Swilly, Leannan and Crana.

The site is of conservation importance as it contains good examples of at least four habitats listed on Annex I of the EU Habitats Directive (estuaries, lagoons, Atlantic salt meadows and old oak woods) and supports a population of Otter<sup>2</sup>. Porthaw is an area of woodland within the Buncrana and Environs Plan area and within this SAC that is specifically mentioned in the SAC site synopsis prepared by the National Parks and Wildlife Service.

### Lough Swilly Special Protection Area (004075)

Lough Swilly Special Protection Area (004075) includes sections of the estuaries of the river Swilly, River Leannan and Isle Burn and its predominant habitat is a series of extensive sand and mud flats that are exposed at low tide; both these estuaries and mud flats are listed on Annex I of the EU habitats Directive. Other habitats represented on the site are salt marshes, lagoonal lakes, rivers and streams, sand and shingle beaches, lowland wet, dry and improved grasslands, arable land, drainage ditches, reedbeds and scrub.

Lough Swilly is of major ornithological importance for wintering waterfowl including 6 species listed in Annex 1 of the EU Birds Directive. There are 16 species of birds occurring regularly in numbers of national importance and 3 species occurring in numbers of international

<sup>2</sup> Lough Swilly SAC site synopsis [www.npws.ie](http://www.npws.ie)

importance as detailed on table 10 below, the site is used regularly by in excess of 20,000 waterfowl and thus qualifies as of international importance.<sup>3</sup>

**Table 10: List of species of birds occurring regularly in Lough Swilly SPA**

Annex 1 of the EU Birds Directive	National Importance
Greenland White-fronted Geese	Great Crested Grebe
Whooper Swan	Shelduck
Bar tailed Goodwit	Wigeon
Great Northern Diver	Teal
Slavonian Grebe	Mallard
	Shoveler
	Scaup
	Goldeneye
	Red-breasted Merganser
	Coot
	Oystercatcher
	Knot
	Dunlin
	Curlew
	Redshank
	Greenshank

Source: Lough Swilly SPA site synopsis www.npws.ie

There are also Natural Heritage Areas (NHAs) and proposed Natural Heritage Areas (pNHAs) within the plan and these are listed on table below and illustrated on Map no. 3.

**Table 11: Natura 2000 sites within or adjoining the Plan Area**

Site/Code/Name	Proximity	Species	Potential Threats
Special Protection Area/004075/Lough Swilly SPA	Adjoins the Plan boundary alongside the Golf Club	Whooper Swan, Curlew, White Fronted Goose	Pollution, Climate change (See Appendix I)
Special Area of Conservation/002287/Lough Swilly, Big Isle Blanket Nook, Inch Lake	Located within Lough Swilly and Porthaw	Otter, Wigeon, Oystercatcher	Pollution, development, tree felling, loss of habitat, invasive species (See Appendix II).

Within 15km of the Plan area, there are a further 7 Natura 2000 sites (Table 12).

<sup>3</sup> Lough Swilly SPA site synopsis www.npws.ie

**Table 12: Natura 2000 sites and proposed Natural Heritage Areas within 15km of the Plan area**

Area	Natura 2000		DECLG (NPWS)
	SPA	SAC	pNHA
Lough Fad West, 11.1 km away (N.E.)			001161
Bulbin Mountain, 8.75 km away (N.E.)			000120
North Inishowen, Coast, 8.5 km away (N)		002012	
Horn Head to Fanad Head, 8.5 km away (NW)	004194		
Ballymastocker Dunes, 10.2 km away (NW)			001089
Ballyhoorisky Point to Fanad Head, 13.2 km away (NW)		001975	
Mulroy Bay, 14.6 km away (W)		002159	

**Natural Heritage Areas and proposed Natural Heritage Areas within the Plan area**

There is one pNHA within the Plan area and one adjacent to the Plan area as detailed below.

**pNHA 002287:**

The Lough Swilly, Big Isle, Blanket Nook, Inch Lake proposed Natural Heritage Area falls within the length of the western boundary of the Plan and extends out into Lough Swilly, it extends from below Letterkenny to north of Buncrana, is estuarine in character, with shallow water and intertidal sand and mud flats being the dominant habitats. The main rivers flowing into the site area the Swilly, Leannan and Crana.

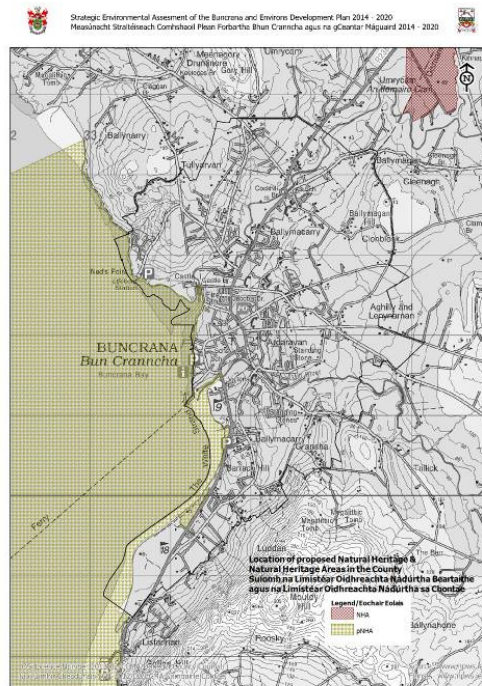
The site is of conservation importance as it contains good examples of at least four habitats listed on Annex I of the EU Habitats Directive (estuaries, lagoons, Atlantic salt meadows and old oak woods) and supports a population of Otter<sup>4</sup>. A large proportion of this site is also designated as SAC (see table 11).

**NHA 002406:**

Umrycam Bog Natural Heritage Area comprises lowland blanket bog bounded on its eastern side by the Owenboy River and its southern and western sides by rush pasture. The site is 0.6 km North East of the Plan boundary at its nearest point. The site is of considerable conservation significance comprising a large area of relatively intact lowland blanket bog which is a globally scarce resource largely confined to coastal regions with cool, wet, oceanic climates at temperate latitudes and comprises less than 3% of the world's peatlands. The lowland blanket bog that occurs in Ireland is considered to be an extreme hyperoceanic variant of the habitat type, found nowhere else in the world except on the coastal fringes of north-west Scotland.

<sup>4</sup> Lough Swilly SAC site synopsis [www.npws.ie](http://www.npws.ie)

Map 3: Location of Natural Heritage Areas and proposed Natural Heritage Areas



In general terms SAC's and SPA's are afforded protection at a European and National level whereas NHA's are protected at a National level only. Habitats outside these designated areas are also key stepping stone habitats or ecological corridors linking sites of prime conservation value (e.g. waterways, woodlands and hedgerows). In December 2007, the first baseline assessments of conservation status for all 59 habitats and c.100 species listed for protection by the EU in Ireland was prepared by the National Parks and Wildlife Service. Many habitats associated with water were considered to be in bad condition. Site Synopses for SPAs, cSACs and NHAs are available from the National Parks and Wildlife Service at [www.npws.ie](http://www.npws.ie). The Appropriate Assessment Report, which accompanies this report, outlines details of Natura 2000 sites within the Plan area and those within a 15 km buffer zone. The report includes the location of the site, site code/name, qualifying interest's conservation objectives and threats to site integrity.

The full extent of Buncrana's natural heritage of wild species, geological features and landforms, and natural and semi-natural habitats, extend to more than just those sites which benefit from statutory protection. Under Article 10 of the EU Habitats Directive it states that Member States shall endeavour, where they consider it necessary, in their land use planning and development policies to encourage the management of features of the landscape which are of major importance for wild fauna and flora. Such features are those, which by virtue of their linear and continuous structures such as rivers, or their functions as stepping stones such as ponds and small woods, are essential for the migration, dispersal and genetic exchange of wild species. The features will vary from area to area and include hedgerows, canals, ponds, lakes, ditches and banks, linear tree belts/shelter belts, larger semi-natural or ancient woodlands, river corridors and other locally important habitats.

The need to conserve biodiversity generally is underlined in the National Biodiversity Plan and Convention on Biological Diversity which Ireland has signed and ratified. This diversity is often understood in terms of the wide variety of plants, animals and micro-organisms which have been impacted upon by human beings over time.

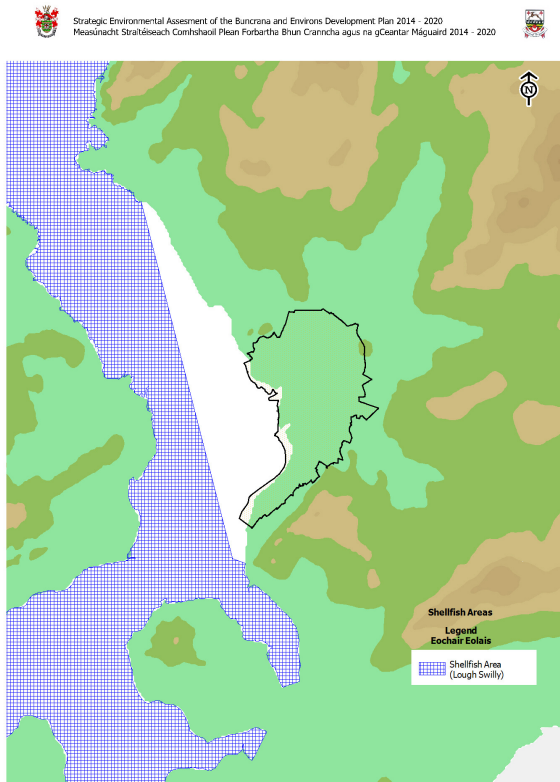
As evidenced in the Corine Land Cover Map 6 of this report, land cover throughout the plan area is quite diverse, in part due to the fact that the plan boundary encompasses a rural area outside of the built up fabric of Buncrana. Only 36% of the plan area is urban fabric, a golf course covers 3% along the western shore and the remainder comprises of a variety of agricultural and natural uses. It is in this context that emphasis on the consideration of the natural environment was an important factor in the plan making process.

Recent policy and guideline documents from the Department of the Environment, Heritage and Local Government emphasise strongly the need for an improved quality of housing within sustainable and well-planned neighbourhoods. The holistic and integrated approach to planning, which the Department is recommending, should incorporate biodiversity protection and enhancement as a core objective.

### Designated Shellfish Waters

A Large portion of Lough Swilly is a designated 'Shellfish water' pursuant to Article 4 of the EU (Quality of Shellfish Waters) Regulations 2006, and has an associated Pollution Reduction Programme established by the DEHLG (details at [www.environ.ie](http://www.environ.ie)). The map below illustrates the extent of the designated shellfish waters within Lough Swilly.

**Map 4: Lough Swilly designated Shellfish Water**



The aim of the Shellfish Waters Directive 2006/113/EC is to protect or improve shellfish waters in order to support shellfish life and growth. It is designed to protect the aquatic habitat of bivalve and gastropod molluscs, which include oysters, mussels, cockles, scallops and clams. The Directive requires member states to designate waters that need protection in order to support shellfish life and growth. The Directive sets physical, chemical and microbiological requirements that designated shellfish waters must either comply with or endeavour to improve.

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 Buncrana's.

**Table 13: Potential threats to the Lough Swilly designated shellfish waters**

Pressures arising from structural changes	Point source pressures	Diffuse source pressures
Channelisation and dredging	Discharges from waste water treatment plants.	Drainage from urban areas, grassland and arable areas (including from dairy farming, cattle farming and the growing of crops).
Flood Protection and embankments	Discharges licensed by the EPA.	Drainage from roads and Railways.
Dams, Locks and weirs	Discharges licensed by local authorities.	Forestry
Intensive land use (land drainage)	Overflows from sewerage systems that by-pass treatment plants, caused by rain storms, usually referred to as combined sewer overflows (CSOs).	Septic tanks
Built structures e.g. ports and harbours	Discharges from water treatment plants.	Activities which use dangerous substances (forestry and agriculture).
Deposition of dredge Spoil		
Coastal defences		

Source: [www.environ.ie](http://www.environ.ie)

## 5.2 Ecological Networks

The town has two rivers, the Crana River to the north and Mill River to the south, these provide the main biodiversity wildlife corridors linking the upland of the east to the coastal area of Lough Swilly. Article 10 of the Habitats Directive recognizes the importance of ecological networks as corridors and stepping stones for wildlife, including for migration, dispersal and genetic exchange of species of flora and fauna. The Directive requires that ecological connectivity and areas of ecological value outside the Natura 2000 network of designated ecological sites are maintained and it recognises the need for the management of these areas through land use planning policies. Ecological networks are important in connecting areas of local biodiversity with each other and with nearby designated sites, to prevent islands of habitat from being isolated entities. Ecological networks are composed of



linear features, such as treelines, hedgerows, rivers and streams, which provide corridors or stepping stones for wildlife species moving within their normal range. They are particularly important for mammals, especially for bats and small birds.

There are 4 key areas of high biodiversity interest within the plan area and these are detailed below:

#### **Porthaw Glen including the parklands of Buncrana Castle**

This area is a unique coastal woodland/heathland providing a diversity of habitats. Part of the Porthaw area is located within SAC 000166. It is recognised as a high amenity area with a well established and maintained footpath along the coastline. Porthaw woodland was designated as a NHA in 2000. The area is a possible remnant of ancient oak woodland and it appears to have a woodland plantation during the late 16th century, due to the even canopy height found throughout most of the area and in close proximity to O'Doherty's Castle. Woodland succession throughout and around the perimeter is continuing and extending the boundaries of Porthaw Woods. Oak woodland succession is found parallel to the coastal path northwards and willow carr succession is prominent within the coastal heath area to the south close to Ned's Point. Within the established woodland area many of the older trees have reached their climax, providing dead wood and allowing more light to filter through the undercanopy aiding the newly generating trees to establish. A transitional zone from strandline coastal to heath and woodland shrub is noticeable with distinct habitat change occurring at the pedestrian path.

The vulnerability of the woodland is noted due to the increase in house building in the area over recent years. As a result and although the woodland has retained part of its tree canopy, the habitat is becoming stressed and its carrying capacity as a semi-natural woodland is reduced.

#### **Riparian river valley and estuary of the Crana River**

The Crana River is the main salmonoid fishing river within Inishowen. The Crana angling club have installed a management plan in respect of this river and the fishing club have created deep pools and fish hatchery. The river passes through Swan's Park and a semi rural landscape before discharging into the estuary. The field systems along the Crana riverbanks range from improved to semi improved pasture with hawthorn hedgerow boundaries. Taller trees overhang the river along the river meanders. The riparian floristic habitat is biologically diverse and provides an important habitat for fauna including mammal and bird species.

#### **Riparian river valley and estuary of the Mill River.**

During Buncrana's early industrial era, the Mill River used to drive the Swan Mills, where the river was dammed. Today the river section close to the town retains woodland glen character. The river is a salmonoid river and the Mill River Angling Club has installed fish pools. The local GAA football field is located on the opposite southern bank. Habitat enhancement works and creation of weirs have been carried out along this section of the river including the installation of bird boxes.

#### **Coastal zone of Luddan**

The coastal zone of Luddan extends from the Inishowen Gateway Hotel to the north boundary of Lisfannon. It includes differing amenity land uses including a golf course and beach. This area contains coastal grasslands managed and unmanaged, and constructed hard standing area for car parking. The 18-hole links golf course consists of managed greens, fairways, and tees, with unmanaged rough areas. The managed play areas are species diversity low, while the unmanaged areas are moderately species rich with flora resembling machair grassland habitat and do provide a habitat for coastal macro invertebrates.

### 5.3 Invasive Species

Invasive species represent one of the greatest threats to biodiversity, second only to that caused by direct habitat destruction. They do this by competitively excluding or out-competing our less robust native species, by preying on native species or by altering the natural aquatic or riparian habitat in which they reside.

A number of invasive, non native species of both flora and fauna are present throughout the County. Invasive species are defined as plants or animals which did not originally occur in Ireland, before human colonisation of the country and which are also expanding their numbers and distribution so as to cause a competitive threat to such native fauna and flora. A full list of invasive species can be sourced at <http://www.invasivespeciesireland.com>

**Table 14: Summary of the threats to the integrity of various categories of habitats (the list of threats is not exhaustive).**

Habitats	Threats
Raised Bogs Blanket Bog Wet Heath Dry Heaths	Changes in local hydrology including drainage. Peat Extraction. Overgrazing. Forestry. Burning. Direct loss of habitat to development Arterial drainage/water abstraction /lowering of the regional water table. Agricultural Reclamation
Lakes and ponds Watercourses/Rivers	Water quality/pollution Changes in flow rates Arterial drainage/water abstraction/ lowering of the regional water table. Siltation. Loss of fringe vegetation. Changes in seasonal water levels /fluctuations. Direct loss of habitat to development. Loading from effluents (WWTP). Recreation/Amenity Use. Developments – marinas. Presence of impassable barriers – mostly poorly designed culverts.
Marine Habitats Bays/Inlets/Estuaries Brackish Waters Open sea	Water quality/pollution. Development of marinas and ports. Disturbance to marine mammals. Dumping at sea. Direct loss of habitat to development. Recreational/Amenity Use.
Woodland/Scrub	Direct loss of habitat to development. Amenity/Recreational Use. Invasive species. Lack of/inappropriate woodland management. Overgrazing (deer).
Semi-natural grasslands Limestone pavement	Agricultural Improvements/Reclamation. Agricultural abandonment. Overgrazing/Undergrazing. Direct loss of habitat to development Quarrying on esker ridges and limestone pavement.

Habitats	Threats
	Bracken & scrub encroachment.
Marshes Swamps Fens Turloughs	Agricultural Improvements/Reclamation. Drainage/Changes in local hydrology Water quality/pollution (including groundwater). Agricultural abandonment. Overgrazing/Undergrazing. Direct loss of habitat to development. Bracken & scrub encroachment. Turf/Peat extraction in fens. Impacts to local geology /geomorphology e.g. quarrying/rock blasting, for turloughs & groundwater fed fens.
Sand Dune Systems Salt Marshes	Agricultural Improvements/Reclamation Drainage/Changes in local hydrology including water abstraction. Erosion (natural and anthropogenic). Water quality/pollution. Agricultural abandonment. Overgrazing/Undergrazing. Direct loss of habitat to development. Bracken and scrub encroachment. Amenity/Recreational Use. Tourism related development.
SPAs	Direct & indirect impacts to the habitats of the bird species of conservation interests (loss of habitat). Direct loss of habitat to development. Water quality/pollution. Disturbance including recreation/amenity use.

Further information on biodiversity, flora and fauna in Ireland may be obtained from the National Parks and Wildlife Service (NPWS) database. The Appropriate Assessment process will integrate with the Environmental Report and inform the review of the Plan in respect to the management of the biodiversity, flora and fauna of the Natura 2000 sites within and adjoining the plan area.

#### 5.4 Population and Human Health

The population of Buncrana in 2011 was 6,839<sup>5</sup>. This demonstrates a strong growth of 13.6% from the 2006 census population of 5,911 compared to a 9.3% increase in Donegal and an 8.1% increase nationally. Despite this level of growth, the trend, in terms of the spatial concentration of growth, is that it has occurred on the edge of the town rather than within the town centre or built up fabric of the town. This is evidenced in Table 15 which illustrates that of the total population growth over the period 2006-2011 in Buncrana Town and Environs area (+928 persons), only 4% of this growth has occurred within the legal town area whereas 96% has occurred in the environs area (Refer to Figure 5).

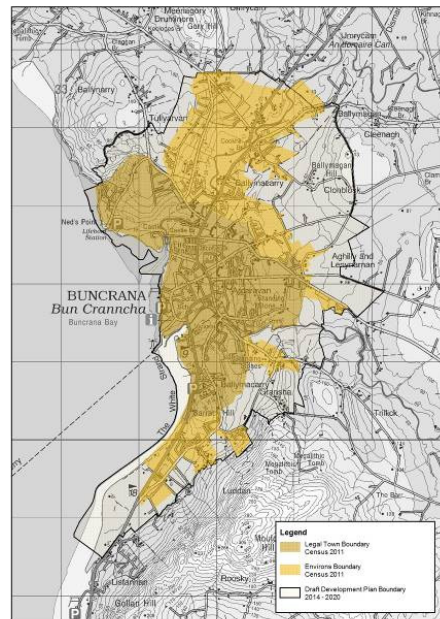
It should be noted that census data set out, relates to the area of Buncrana Town Council and Environs, which is a geographically smaller area than that of the Development Plan. This comparison of the geographical areas is demonstrated in Map 5 overleaf.

<sup>5</sup> ibid

**Table 15: Population change in Bunrana Legal Town and Environs (2006-2011)**

Census Area	Population 2006	Population 2011	Actual population growth	% of total growth occurring within each census area
Bunrana Legal Town and Environs Area	5,911	6,839	928	--
Bunrana Legal Town Area	3,411	3,452	41	4
Bunrana Environs Area	2,500	3,387	887	96

**Map 5: Development Plan Boundary 2014-2020 Relative to the Census (2011) Areas of Bunrana Legal Town and its Environs**



An analysis of the dependency ratio for the area of Bunrana legal town and environs reveals that 54% of the population are classified as being dependant. This is lower than the rate for County Donegal (56.9%) reflecting the higher number of people of working age within the urban context of the town than in the wider County Donegal scenario.

In terms of the age break down of population within Bunrana Town and Environs area, there is a strong consistent number of children in each of the years in the 0-11 age cohort with a slight increase in the number of children within the 0-5 preschool age group. This in turn may have implications for the provision of primary and secondary education facilities.

The unemployment rate in Buncrana was 31.1% in 2011, and is reflective of the increasing unemployment rate in both the County and the State. The labour force is strong in terms of educational qualifications attained, with 38% of the population aged 15 and over having a third level education. Chapter 3, Economic Development provides more detailed analysis of available economic indices.

Buncrana is connected to the rest of the National Road network via two Regional roads, the R238 and a short section of the R239 from Burnfoot to Bridgend further linking to the N13, the National Primary road that connects the linked Gateway of Letterkenny and Derry. These strategic road connections are important to Buncrana's role in the County as a Strategic Support Town. Public transport is provided by Lough Swilly Buses services and according to the 2011 CSO census data the percentage of people using public transport, walking or cycling to work was 25%. This figure is relatively low given that a high percentage of people (72%) live within 30 minutes of their place of work or school in Buncrana with 54% of the population having less than 15 minutes to travel to work or school.

68% of households have private access to broadband, which compares to 65.1% nationally. This figure demonstrates strong virtual connectivity of the town within the region.

The town has a relatively new residential building stock with 60% of properties built from 1991 onwards, therefore quality in the existing building stock is high. A high percentage of properties were unoccupied at the time of the census, 28%. Although this is in line with Donegal's vacancy rate, which was 28.6% the national average was substantially lower at 14.5%. There are also a large proportion of houses that are rented within the town amounting to 32% compared to 29% nationally. The census revealed that the household size in the town is predominately 1-4 persons and on average there are 5-6 rooms in properties. The majority of properties within the area have oil central heating. In terms of sewage 89% of properties are connected to the public sewer compared to 69.5% nationally and 94% are connected to the Public mains water compared to 78% nationally. These infrastructural trends contribute to the river water quality within Buncrana, which is of a relatively good scoring (3 out of a possible 5 overall).

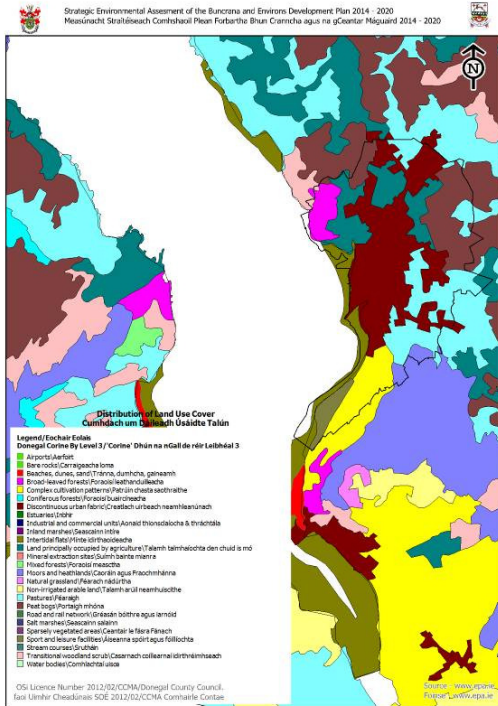
## 5.5 Land Cover

The data on land cover is based on the CORINE Land Cover Maps. These are maps of the European environmental landscape based on interpretation of satellite images. The European Environment Agency, in conjunction with the European Space Agency, the European Commission and member countries is currently updating the CORINE land cover database.

**Table 16: CORINE land cover within the Buncrana and Environs Plan area**

Land Use Class Name	Total area km2	% landcover
Agricultural Area	1.61	13.21
Transitional woodland scrub	0.0251	0.20
Peat bogs	1.5987	13.12
Moors and heath land	0.2218	1.82
Broad-leaved Forest	0.5161	4.23
Sport and leisure facilities	0.3531	2.90
Discontinuous Urban fabric	4.345	35.65
Complex cultivation	0.9330	7.66
Intertidal flats	0.5842	4.79
Pastures	1.9995	16.41

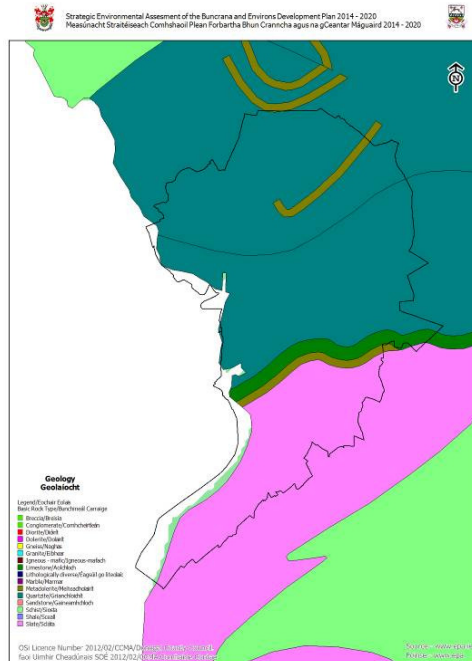
Map 6: CORINE land cover



### Geology/Soil

The geology for the plan area was mainly formed during the Lower Carboniferous Period. The underlying bedrock of Buncrana includes Fahan slate formation with overlying sandy gravels and conglomerates. The river valley of the Mill River flows over a narrow band of Culdaff limestone with a sill of metadolerite along the rivers southern embankment extending from the estuarine zone inland to Cassidy's Readymix Plant. The local soils throughout the area range from shallow to moderate depth peaty podzols and established podzolics types with a moderate percentage of loam and sandy clays and ground in most places appears to be relatively free draining, however there are areas prone to water-logging.

Map 7: Geology of Buncrana and Environs Plan Area



## 5.6 Water

### North West River Basin Management Plan (NWRBMP) 2009-2015

In accordance with the EU Water Framework Directive, Ireland is committed to manage all waters through a catchment-based process, and the River Basin Management Plan (RBMP) is the mechanism for achieving this. The plan aims to protect all waters within the district and, where necessary, improve waters and achieve sustainable water use.

The implementation of the RBMP seeks to bring incremental improvement leading to many waters in Donegal reaching at least 'Good' status by 2015. Where waters are currently at less than good status, they must be improved until they reach good status and there must be no deterioration in the existing status of waters.

The RBMP for the North West (including Buncrana) indicates that the Crana River is achieving 'Good' status (09/10/2012) at sections at Wilson's Bridge, Westbrook and Cockhill Bridges. Further up river at Ballymagan Lower, water quality at the Crana River is recorded as 'Poor'. This is an improvement from a year ago when the Crana was recording 'Poor' status within the town. The Mill River is recording both 'Poor' and 'High' quality status at locations close to the Mill Bridge. It is an objective of the NWRBMP to restore these waters to 'Good' or 'High' status by 2015.

In 2010 the Crana Water Management Unit Action Plan indicated that there were 4,163 septic tanks in this Water Management Unit (WMU). Of this total, 1,082 septic tanks pose a risk to water quality in 2 river water bodies due to their density, location and hydrogeological conditions. In Buncrana there are 2,205 houses connected to the mains sewer and 162 septic tanks. The source of total phosphorus load is predominantly from agriculture (42%), wastewater treatment plants (23%) and forestry (16%). Industrial discharges and unsewered properties are also sources of nutrients in the WMU. The Census 2011 data indicates that there are 2205 residential units within the census area of Buncrana that are serviced by a public sewer, with a further 162 residential units served by other means.

### Ground Water Status

The chemical and quantitative status of each groundwater body was determined based on the criteria set out in the WFD. The classification process also considered the ecological needs of the relevant rivers and terrestrial ecosystems that depend on contributions from groundwater and the assessment of the impact of pollution on the uses (or potential uses) of the groundwater body, e.g. for water supply.

The quantitative status of all the groundwater bodies in the County is good, as set out in the North West International River Basin Management Plan and there is no evidence of significant impact or damage resulting from human activity on groundwater levels.

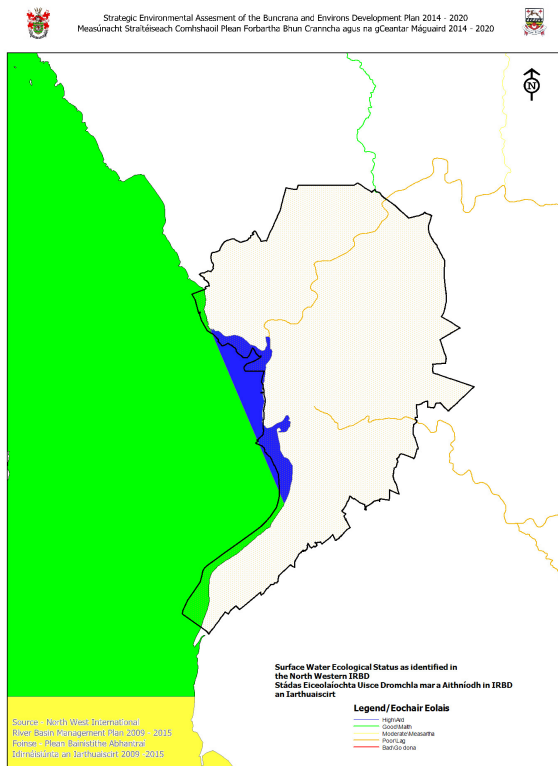
### Surface Water Status

Surface water status is determined by its chemical and ecological status, and is defined by whichever of these is lower. Ecological status is based on a range of biological quality elements and supporting physico-chemical quality elements. The hydromorphological condition of high status river sites is also considered in assigning status.

In each case status is assigned to high, good, moderate, poor or bad status depending on the available information, the surface water ecological status for rivers, lakes and transitional waters is shown on Map no. 8 below.

The overall aim for surface waters, which include rivers, lakes, transitional (estuaries and lagoons) and coastal waters, is to achieve at least 'good ecological status' and 'good chemical status' by 2015, as well as preventing deterioration in those waters classified as 'high' or 'good'.

Map 8: Surface Water Ecological Status (NWIRBD)





The Crana River is achieving 'good' status (09/10/2012) at sections at Wilsons Bridge, Westbrook and Cockhill bridges. Further up the Crana River at Ballymagan Lower, the water status is recorded as 'Poor', an improvement on the previous year when the Crana had a 'poor' status within the town.

The Mill river is recording both 'poor' and 'high' quality status up river but 'poor' status has been recorded downstream in Buncrana.

### **Waste water treatment**

The existing Waste Water Treatment Plant (WWTP), with primary treatment is located close to Victoria Bridge, Railway Road and the treated effluent is then discharged to Lough Swilly via a long sea outfall. The site has an area of 0.518 hectares and is identified on the land use zoning together with an expanded area zoned as 'infrastructure' to facilitate planned (and further potential) upgrades to the plant.

The WWTP is designed to treat wastewater for a P.E of 13,200, however the Urban Wastewater Treatment Regulations 2001 require secondary treatment for population equivalents greater than 10,000 for discharge to coastal waters. The Department of the Environment and Local Governments Water Services Investment Programme 2010-2013 includes a scheme at planning stage to upgrade the WWTP and provide sludge management facilities. The preliminary report has been prepared and this assessed the future requirements for the agglomeration of Buncrana and the recommended scheme includes:

- Expansion and upgrade of the WWTP to cater for a design P.E of 13,200 and provide secondary level treatment with disinfectant prior to discharge;
- Provision of sludge holding, thickening and dewatering facilities for the wastewater treatment sludge.

The existing population equivalent (P.E) of the discharge was calculated to be 7,364 in 2012, and the growth allocation set out in the core strategy of the plan is 1,381 persons. There is sufficient existing capacity to cater for the target growth allocation and existing extant permissions that have not yet commenced (currently 1,200 P.E.). A discharge licence was granted by the EPA for the plant in January 2011, which provides for a P.E. of 2,000-10,000.

In order to ensure compliance with the provisions of the Urban Wastewater Regulations and the Wastewater Discharge Regulations it is essential that ongoing monitoring take place on a case-by-case basis to ensure adequate capacity is available for any proposed development.

### **Waste water treatment systems serving single houses**

There are 162 unsewered properties<sup>6</sup> in plan area; wastewater treatment systems serving single houses has been highlighted as a significant issue within the County in general in terms of pollution control and public health. Circular letter PSSP 1/10 issued by the Department of Environment, Heritage and Local Government on 5th Jan 2010 refers to the European Court of Justice ruling against Ireland in relation to wastewater treatment systems (ref. Case C-188/08) serving single houses in unserved areas. The court found that Ireland had failed to comply with the requirements of Articles 4 and 8 of the Council Directive 75/422/EEC as amended (Cavan County Council being the only exception).

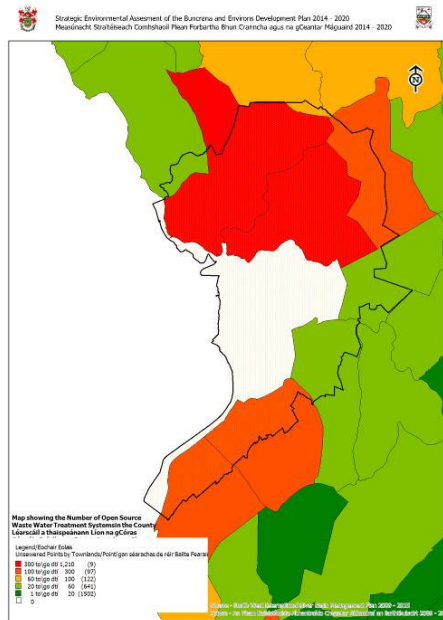
As an interim response to the ruling the DEH&LG have issued Circular PSSP 1/10 dealing with Development Plan and Development Management responses. The Department has

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<sup>6</sup> www.cso.ie

indicated that they will be issuing further Guidance and developing legislation in order to fully respond to the ruling. The Circular relies heavily on the implementation of the new EPA code of Practice in respect to Wastewater Treatment systems and states that the code should apply to all applications received after the 8th Jan 2010. Map no.9 below illustrates the number of unsewered properties in the Buncrana Plan area.

**Map 9: Location of on-site waste water treatment systems within the Buncrana and Environs Plan area**



### Drinking water

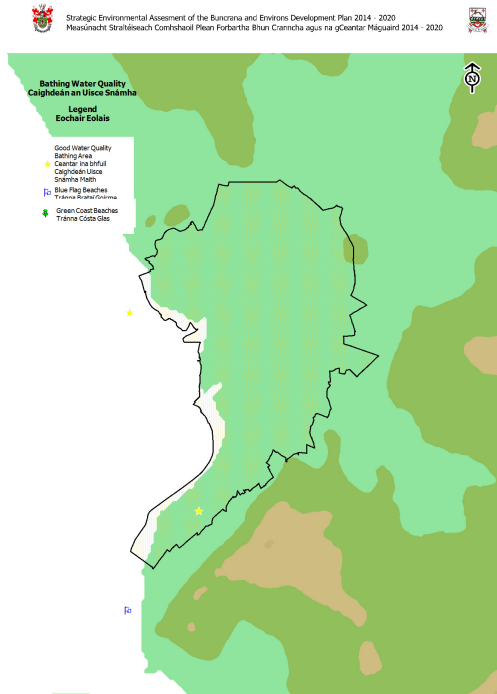
Buncrana's water supply is sourced from Lough Doo and supplied via the Slavery water treatment plant. Water is supplied to the south of the town from the Eddie Fullerton Dam. Drinking water supply to serve Buncrana is of sufficient quantity and quality to cater for the existing and planned growth of the town.

### Bathing Water

Bathing water quality was assessed at Lady's Bay, just north of the plan area and Lisfannon, within the southern part of the plan area by the EPA. Both beaches were designated as 'Good Water Quality- compliant with EU Guidance and Mandatory values' in 2008 and 2009. The most recent available assessment in 2011 however showed that Lisfannon beach maintained its 'Good Water Quality' status whilst Ladies bay was downgraded to 'Sufficient water quality status- compliant with the EU mandatory values only'<sup>7</sup>.

<sup>7</sup> <http://www.epa.ie/pubs/reports/water/bathing/2011BathingWaterQualityMap.jpg>

## Map 10: Bathing Water Quality



### Blue Flag beaches and Green Coast Awards

In 2013, Lisfannon beach was again awarded 'Blue Flag beach' status and Ladies Bay was again awarded the 'Green Coast Award'

## 5.7 Air and Climate Factors

Climate change is recognised as a potential threat to the future sustenance of the planet due to the effects of global warming and resultant changes in weather patterns, rise in sea levels, loss of habitats, species and ecosystems and other natural occurrences. It is now a mandatory requirement of the Planning Act to include the promotion of measures to reduce anthropogenic greenhouse gas emissions and address the necessity of adaption to climate change.

The National Climate Change Adaptation Framework (*Building Resilience to Climate Change*), DECLG, December 2012 sets the policy context for a strategic national adaptation response to climate change in Ireland. It introduces an integrated policy framework, involving all stakeholders on all institutional levels, to ensure that adaptation measures are taken across different sectors and levels of government to manage and reduce Ireland's vulnerability to the negative impacts of climate change. The relevant Government Departments, Agencies and local authorities are to commence the preparation of sectoral and local adaptation plans, with an objective that they publish drafts of these plans by mid-2014.

It requires development plans to promote the sustainable settlement and transportation strategies in urban and rural areas, including the promotion of measures to reduce energy demand, man-made greenhouse gas emissions and address the necessity for adaptation to climate change, having regard to location, layout and design of new development. The

approach will bring about more compact and less energy-intensive forms of urban development and assist in adapting to climate change effects such as flood risk.

The EU Commission have established the following binding targets for Ireland: a 20% reduction, in greenhouse gas emissions by 2020, relative to 2005 levels, and to meet Renewable Energy Target of 40% electricity generation by 2020.

By 2020, Ireland will have achieved 20% improvement in energy efficiency across all sectors and 33% energy end-use efficiency savings target for the public sector. The location, design and construction of domestic and commercial development can have a significant effect on greenhouse gas emissions.

**Table 17: Sources of Greenhouse Gas Emissions in Ireland**

Activity	%
Agriculture	30
Energy	22
Transport	19
Industry & Commercial	15
Residential	12
Waste	2

Source: EPA 2011

The main sources of greenhouses gases nationally is detailed in Table 17 however not all of these activities are prevalent in Buncrana. Notwithstanding this, there are a number of local activities such as the manufacturing of concrete, transportation and heating, building, livestock/fertilisers which are all potentially local sources of greenhouse gases. Accordingly, there is a need to sustainably manage these activities to an appropriate level.

Four air quality zones, A, B, C and D are defined for Ireland in the Air Quality Regulations (2002) and Buncrana is located within Zone D: Rural Ireland. Overall, air quality in Ireland continues to be good and is among the best in Europe. This is due largely to the prevailing clean westerly air-flow from the Atlantic and the relative absence of large cities and heavy industry. However, Ireland faces a number of challenges in the near future when trying to meet our obligations under EU legislation.<sup>8</sup>

There are no permanent monitoring stations in the County, the nearest in the Republic of Ireland is in Sligo. A monitoring station is maintained at Derry City but is not considered to provide relevant information given its environment is described as 'urban background.' The lack of air quality monitoring at relevant location is a restriction on this assessment.

### **Climate change and Marine and Coastal Management**

The impacts of climate change are projected to increase in the coming decades. According to the EPA the Irish climate is changing in line with global and regional trends.

**Temperature:** Air and sea surface temperatures have been rising at 0.2 - 0.6 Celcius per decade. Seven of the ten warmest years on record have occurred in last decade.

**Storms and waves:** A greater incidence of severe winds and larger wave heights have been observed in western waters.

<sup>8</sup> Source: Air Quality in Ireland, key indicators of ambient air quality, EPA 2011

**Sea Level:** There has been a global rise of about 3mm/year and a higher frequency of extreme water levels and flooding due to sea level rise and an increase in the extent and rates of coastal erosion.

**Ocean acidification:** The ocean is becoming more acidic and it is likely that Buncrana will be impacted by these changes however the level of impact is uncertain at present. Ecosystems and sensitive habitats may be impacted as water temperatures increase, this will affect fisheries and aquaculture. There may also be an influx of non-native species which find the new warmer environment more suitable to their needs.

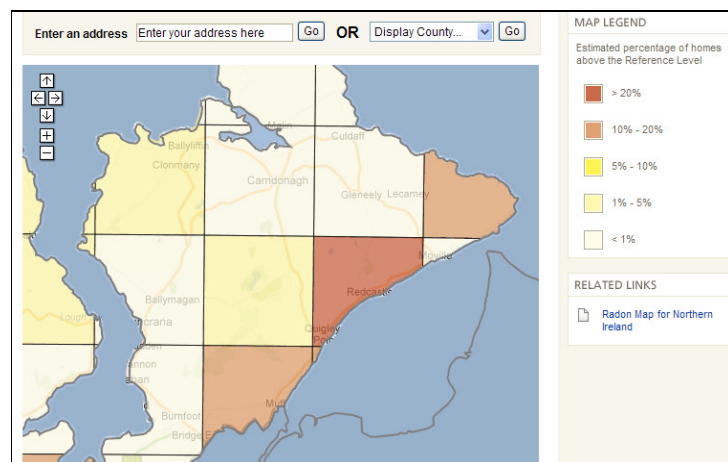
**Coastal wetlands** may be negatively affected by sea-level rise especially where they are constrained on their landward side, or starved of sediment and increases in precipitation may lead to flooding, pollution and algal blooms which have health and safety implications as well as the environmental impact. Algal blooms have been evident around the Donegal coast during 2012.

**Coastal Flooding** is becoming more frequent and widespread in Ireland. Coasts are projected to be exposed to increasing risks, including coastal erosion, due to sea-level rise, and effects exacerbated by increasing human - induced pressures on coastal areas.

#### Radon Gas

The presence of radon gas in buildings is a significant health issue. A map has been produced to identify the highest risk areas throughout the Country, fortunately Buncrana has low incidences of radon, with less than 1% of homes estimated to be above the reference levels. This compares favourably with other areas where the penetration levels have exceeded 20%. Notwithstanding this, the Building Regulations now requires that all buildings have radon barriers installed to prevent the gases seeping into properties which have less breathability to properties, due to improved levels of insulation.

**Map 11: Radon Map**



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

## 5.8 Material Assets and Cultural Heritage

Material assets include a wide range of natural and man made assets. These can include infrastructural services and facilities and other items such as cultural heritage, agricultural lands, quarries, coastal and water resources and coastal defences. Developments and activities can often impact on material assets. There is a relatively high level of residential and commercial vacancy in the Town, table 18 below shows the % of commercial vacancy

in each street within the town centre, as surveyed in March 2013. This represents an underutilised resource and if left idle can deteriorate and detract from the character of urban and rural areas.

**Table 18: Commercial vacancy within Buncrana Town Centre (March 2013)**

<b>Street Name</b>	<b>Number of vacant units</b>	<b>Vacancy as a % of the street</b>
Upper Main Street	12	21.05
Lower Main Street	4	11.11
Cockhill Road	1	4.54
Ferris Lane	4	25
Church Street	3	33.33
St Mary's Road	1	2.04
Maginn Avenue	2	6.06
St. Orans Road	2	25
Millbrea	8	15.38
Ardaravan/ New Street	4	4.65
Castle Avenue	1	9.09

**Cultural Heritage including Archaeology and Architectural Heritage**

The built environment refers to all features built by man in the environment including buildings and other structures such as bridges, archaeological sites and field boundaries. These structures have been influenced by the particular physical, climactic, technological, cultural and socio-economic circumstances of their creators and are a record of man's continuous interaction with his environment. Non-structural elements, such as historic gardens, stone walls, ditches and street furniture, make a significant contribution to our built heritage. Stone walls and hedgerow in particular are an integral part of our rural/demesne landscape, often providing significant historic reference of landownership and farming patterns, and contributing to the character of areas. They can be vulnerable to needless damage or destruction during development, as well as inappropriate and poor reconstruction. While not every structure is of sufficient importance to warrant the rigours of special protection, the conservation of good examples of the cultural and built heritage is vital if a sense of continuity with the past is to be maintained.

The town has a rich and diverse heritage and brings benefits to all that live in the town and those who visit. Along with forming our identity, heritage teaches us lessons from the past and also brings economic benefits to the region by providing scenic landscapes, vernacular architecture and historic monuments for the tourist. Retaining a wide diversity and quality of heritage resources can also be seen as a measure of success and competitiveness.

The Planning and Development Act 2000 (as amended) sets out the requirements of Development Plans to protect architectural, historical, archaeological, artistic, cultural, scientific and technical structures of special interest by including a record of protected structures.

The archaeological heritage of the County is a unique resource, which has shaped our landscape and our cultural identity. Archaeological remains of special interest are included in the 'Record of Monuments and Places'. The National Monuments Acts 1930 – 1994 provide for protection of our archaeological heritage. The Department of Arts, Heritage and the Gaeltacht National Monuments Section has a specific role in relation to the protection of the archaeological heritage. There are 20 monuments protected on the Record of Monuments and Places (RMPs) under the National Monuments Acts 1930-1994 within the plan area as detailed in table 19 below:

**Table 19: RMPs within the Development Plan area**

Classification	Townland	RMP number
Bullaun stone	Tullyarvan	1/DG029-018
Souterrain	Clonbeg	2/DG029-01902
Ringfort (Rath/Cashel)	Clonbeg/Tullyarvan	3/DG029-01901
Ringfort	Ballymagan Upper and Lower	4/DG029-011
Enclosure	Ballymagan Upper and Lower	5/DG029-020
Souterraine	Tullyarvan	6/DG029-024
Dwelling	Tullyarvan	7/DG029-02502
Castle - tower house	Tullyarvan	8/DG029-025001
Enclosure	Ballymacarry	9/DG029-0226
Cashel	Ballymacarry	10/DG029-027
Cashel	Ardaravan	11/DG029-028
Standing Stone	Ardaravan	12/DG029-031
Short Cist	Ardaravan	13/DG029-030
Enclosure	Aghilly and Lenynarnan	14/DG029-032
Standing stone	Gransha	15/DG029-038001
Standing stone	Gransha	16/DG029-038002
Standing stone	Gransha	17/DG029-039001
Standing stone	Gransha	18/DG029-039002
Burial ground	Luddan	19/DG029 04101
Midden	Luddan	20/DG029-043

The town's archaeological Heritage is not confined to sites and areas listed on the Record of Monuments and Places but also includes archaeological structures, artefacts and sites not yet discovered as set out in The National Monuments (Amendments) Act 1994.

#### Protected Structures

There are currently three protected structures, namely Swan Mill, Buncrana Castle and the Drift Inn, detailed in table 20 below. The plan proposes the designation of a 'Area of Special Townscape Character' and associated policy framework for new development within this proposed area.

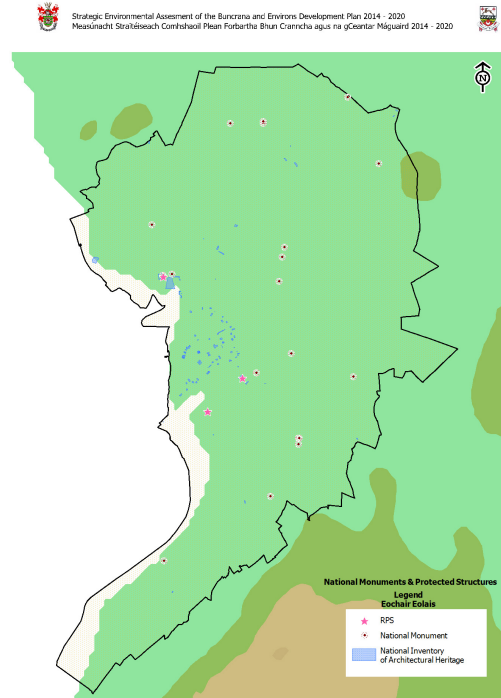
**Table 20: Record of Protected Structures**

No./Ref./ Name/Address	Description/Rating/Special Interest
1/4090 2907/ Drift Inn/ Railway Road	Local/AP/1860-1865. Detached 6 bay, 2 storey former railway station built 1864 with gabled dormers, projecting gabled end-bay to right hand side and entrance bay 3 bay single storey former sheds to left hand side extended by one storey.
2/4080 0102/ Mill River Bridge	Regional/ASM/1700-1750. 3 arch road bridge over waterfall built, 1740, with extended westwards twice with rubble stone voussoirs vault abutments and parapets.
3/40902901/ Buncrana Castle/Swan Park	1710-1720. Detached 7 bay, 2 storey over basement house built 1718 with projecting roofed pavilions on both sides, 2 bay, 2 storey extension to south left hand side and split level stair return to rear and breakfront to central 3 bays National / AGH / with open pedimente.

### National Inventory of Architectural Heritage

The Department of the Environment, Community and Local Government undertook extensive survey work on the Architectural heritage of Buncrana that resulted in the identification of 102 buildings/ Structures on the register entitled 'National Inventory of Architectural Heritage' (NIAH). The Minister has recommended that each of these should be prioritized for protection. These buildings are listed within Chapter 11 of the Draft Buncrana and Environs Plan 2014-2020 and further details can be viewed on [www.buildingsofireland.ie](http://www.buildingsofireland.ie)

### Map 12: Location of RPS, NIAH, draft NIAH, and RMPs within Buncrana and Environs Plan area



### Urban form

Development of Main Street and Mill Brae occurred throughout the eighteenth and nineteenth centuries and remains largely intact giving the town centre a strong architectural character. While many of the buildings are of architectural value in themselves it is the cumulative character and detailing of the buildings and their interaction as a streetscape that presents significant value.

The area between Main Street and Lough Swilly largely developed as a low-density suburb in the first half of the twentieth century. Agriculture remains the most extensive land use in the outer area but residential development has significantly encroached upon this area in recent years.

The high quality coastal pedestrian walkway together with Swan Park and local beaches (including the Lisfannon Blue Flag beach) contribute to the cultural heritage and material assets of the town.

### Landscape and visual impacts

A landscape Character Assessment was prepared for the Buncrana and Environs Plan 2008-2014 providing a spatial representation of the plan area, the assessment identified 12



character areas within the plan area. Further detailed landscape survey work shall be carried out by the Council (s) during the life of the Buncrana and Environs plan wherein it shall form part of the wider 'Landscape Character Assessment' of the County.

**Inter-relationships between Environmental Topics**

The inter-relationship between environmental topics is largely dealt with herein as they arise. Furthermore an assessment of each of the strategic objectives, objectives and policies has been undertaken considering a range of strategic environmental objectives (as contained within table 26) of this environmental report. The following inter-relationships are considered relevant.

**Table 21: Potential Inter-Relationships between SEA Topics**

Biodiversity, Flora and Fauna	√								
Population/Human Health	√	√							
Soil	√	√	√						
Water	√	√	√	√					
Air	√	√	√	X	√				
Climate	√	√	√	√	√	√			
Material Assets	√	√	√	√	X	√	√		
Cultural Heritage	X	√	X	√	X	X	√	√	
Landscape	√	X	√	√	X	X	√	√	√
	Biodiversity, Flora and Fauna	Population/Human Health	Soil	Water	Air	Climate	Material Assets	Cultural Heritage	Landscape

**6.0 Significant Environmental Pressures**

The future development of Buncrana has the potential to impact on the environment at a county and local level. New development brings with it a need for supporting infrastructure and key environmental issues that may arise include water supply, treatment of waste water, flooding, transportation and the capacity of the natural resource to cope with development proposals. Increased population growth in the town is likely to give rise to an increase in car use, particularly where public transport is not readily available. This can lead to negative impacts in terms of carbon emissions, air quality and human health.

The more significant environmental issues identified during the SEA process include water quality, biodiversity, landscape and cultural heritage, built heritage, transportation, tourism, energy resources, greenhouse gas emissions, climate change, flood risk, waste management and coastal management. Achieving a good quality of life for the people who live, work or visit the town is considered to be a key objective of the SEA process. Securing economic development and social equity, together with preserving and enhancing the character of the town, are closely associated with environmental issues.

To date, air quality and noise pollution have not been raised as significant environmental issues, however they have been scoped-in, due to potential indirect environmental impacts.

A list of the significant environmental issues that were deemed to have been 'scoped in' during the scoping exercise is given in Table 22 below. The environmental impacts mentioned under the various topics listed in the table can act across a number of topic

areas and the impacts can vary in scale and extent, some are short term and reversible, others are more long-term and may be permanent. Also, whereas individual impacts may be minor, the cumulative impacts, particularly when viewed over the longer term can be significant.

**Table 22: Scoping of SEA Topics**

SEA Topics Scoped	In	Indicative list of environmental impacts that need to be considered, either directly or indirectly, in the Environmental Report .
Biodiversity, Fauna and Flora	In	Impacts on protected areas: European Sites (SACs SPAs) Impacts on National Protected sites, (pNHAs, NHAS). Impacts on flora and fauna and habitats including coastal and marine habitats, floodplains, wetlands, watercourses, peatlands and woodlands.  Impacts on sensitive habitats, including protected fish species (Atlantic Salmon) peatlands. Impacts of invasive species.  Interaction with Habitats Directive – Article 6 & 10 requirements. Protection of Lough Swilly designated shellfish waters.
Population	In	Impacts of change in population profile. Impacts of change in settlement pattern and car use. Road Safety. Efficient use of infrastructural and community services. Increased demand for waste water treatment systems and waste management facilities. Impacts on environmentally sensitive areas.
Human Health	In	Impacts on water quality including drinking water and bathing water. Air and Noise pollution to a lesser extent. Impacts associated with flooding. Generally impacts mentioned elsewhere tend to act either directly or indirectly and to varying extents on human health and wellbeing.
Soil	In	Impacts of land use activities including, urban development, windfarm, waste disposal, afforestation, recreation and agricultural activities.
Water	In	Impacts of development and activities on water quality including surface and groundwaters drinking water and bathing water. Impacts of urban and suburban development including, wastewater and surface water disposal, agricultural activity, water recreational activities.
Coast/Marine resource	In	Inappropriate development near /on the coast Dynamic needs of the coast (coastal squeeze) Flood risk and coastal defences Tourism impacts and sustainable management e.g. Sensitive dune systems and beach access points Litter disposal and public services (e.g. toilets) Activities in the water Coastal /Marine spatial planning
Air	In	Impacts of air pollution associated with transport and industrial emissions.
Climatic factors	In	Impacts of greenhouse gas emissions and flooding. Also impacts of energy generation and consumption. Impacts of energy use and need for conservation. Water pollution due to flooding and algal blooms due to rises in temperature, Stresses on species and habitats Increase in storm events increase in precipitation ( Perhaps less frequent but more severe)
Renewable Energy	In	Onshore and offshore opportunities and implications Onshore – Scenic amenity Access roads Loss of biodiversity Offshore Impact on birds & marine mammals Deployment issues Grid connection locations
Material Assets	In	Impacts of development on infrastructure, utilities and amenities including road, water supply, wastewater treatment facilities, amenities and cultural heritage. Also included are impacts on economic assets such as quarries, agricultural lands, coastal and water resources which support fisheries and the tourism industry.

SEA Topics Scoped	In	Indicative list of environmental impacts that need to be considered, either directly or indirectly, in the Environmental Report .
Cultural heritage, including Architectural and Archaeological	In	Impacts on items and features of heritage value including items of landscape, architectural, archaeological and historical importance, including shipwrecks.
Landscape	In	Impact on visually sensitive areas including designated landscape and seascapes.
Interrelationship between the above topics	In	Cumulative impacts and interaction of above mentioned items. The impacts and interactions will obviously vary in extent and nature.

## 6.1 Biodiversity, Flora and Fauna

There has been a decline in many native species in Ireland through habitat loss, competition, development and agriculture. It is of primary importance to manage and protect a wide range of habitats and species of importance and particularly Natura 2000 sites (SAC's and SPA's) and NHA's and pNHA's.

Developments associated with agricultural activities, windfarms, afforestation, urban development, ports and airports and a wide range of infrastructural works (including road works, water abstraction, wastewater disposal) within or close to the areas of ecologically sensitive sites must be carefully planned and managed so as not to compromise the integrity of these sites.

Wastewater discharges, runoff from agriculture, leachate from landfills and contaminated sites and nutrient input from forestry can all have detrimental effects on water quality resulting in subsequent impacts to biodiversity. Annex II species such as salmon are particularly sensitive to pollution. The protection of shellfish growing areas from pollution is an issue of significant environmental concern within Lough Swilly.

Certain development works on shorelines and floodplains and the associated infilling of wetlands is a potential environmental problem within the town. Invasive non-native plant and animal species are one of the threats to biodiversity in the town.

Other factors that may impact on biodiversity of the plan area include;

- Loss of environmentally sensitive 'greenfield sites' to development works.
- Changes in hydrology including drainage and flooding and infilling of wetlands.
- Peat/Turf extraction.
- Overgrazing/undergrazing.
- Damage arising from intensive recreation/amenity use.
- Damage arising from quarrying activities.
- Loss of hedgerows.
- Loss of local biodiversity pockets.
- Damage arising from wildfires.

## 6.2 Population and Human Health

An increase in population has the potential to impact on biodiversity, water quality, landscape, cultural heritage and air quality. Individual and cumulative changes in the

quality of the environment at local, regional and national level has the potential to impact to varying degrees on human health and wellbeing.

Waste discharges from municipal wastewater treatment plants and certain agricultural activities particularly slurry spreading and afforestation is a significant pressure on water quality and hence public health. The cumulative impact of one-off served by wastewater treatment systems, are a significant risk to water quality. This is of particular concern where ground conditions are poor and where rural housing is located within environmentally sensitive areas.

Development permitted in flood risk areas, also has the potential to result in health and safety concerns for residents if flooding occurs and these incidents may increase as the impacts of climate change are experienced more frequently

An increase in traffic/pedestrian movement can give rise to an increased risk in terms of road safety.

High levels of radon buildings that are occupied by people pose a risk to human health within certain areas of the County and possibly Buncrana. This is of particular concern in the case of buildings erected prior to the change in the Building Regulations in 1998 where radon levels are relatively high and where radon control measures have not been undertaken.

Noise pollution has not been raised as a significant concern within Buncrana.

### **Road Safety**

Road Safety is a key priority in national government policy and Ireland's Road Safety Strategy (2013-2020) has the objective of radically and sustainably improving safety on Irish roads. Climate change also has the potential to impact on the management requirements of our roads. For example, there may be a need to change the type or quality of road surfacing material to one that can withstand colder winters and warmer summers. There may also be a need for increased supplies of grit/salt if harsher winters continue to be the norm.

### **6.3 Soil**

Precipitation changes, predicted as one of the climate change impacts on Ireland, could have significant implications for slope stability and landslides and their resultant impacts on water management activities.

Eroded soil washed into rivers during heavy rainfall contains an increased nutrient content, which can damage the balance of nutrient poor, aquatic ecosystems by shifting their species composition, supporting more nutrient-loving species. This can lead to the eutrophication of rivers and lakes. As water temperatures rise due to climate change the eutrophication will be exacerbated, the impacts of soil erosion and soil stability is likely to vary accordingly. Mismanaged extraction activities can also result in pressures on water quality and peat cutting can be damaging to vegetation, hydrology and landscape as well as destroying vital carbon sinks.

### **6.4 Water**

The main pressures on surface and groundwater quality within the County are point and diffuse, physical modifications, climate change and other local issues. Point and diffuse sources include wastewater from developments such as industrial discharges, soiled surface water, landfills, quarries, contaminated sites, agriculture, wastewater from substandard

wastewater units, forestry, discharge of dangerous substances and illegal dumping. Water bodies that depend on a small catchment are particularly vulnerable to pollution and as such the protection of water quality is of significant importance.

Inputs of nutrients, namely phosphorous and nitrogen, at concentrations in excess of natural levels, resulting in over-enrichment and eutrophication present one of the most significant risks to water quality.

The protection of sources of drinking water, the protection of bathing waters and the protection of fish stocks is a priority within County Donegal including Buncrana.

The protection and improvement of water quality crosses a number of environmental topic areas including health and biodiversity and is a major environmental concern.

The North West International River Basin District management Plan has resulted in the carrying out of a comprehensive assessment of water quality (and associated issues) within the town and its catchment area. Accordingly, the integration of the aims and objectives of the NWIRBD and associated programme of measures into the Plan review is a key consideration in terms of securing good water quality status and associated habitats within the town and environs.

## **6.5 Climate Change and Air Quality**

A dispersed settlement pattern can give rise to a high dependency on the use of the car particularly where there are limited public transport options. This in turn gives rise to an increase in greenhouse gasses as well as other environmental problems such as unsustainable demand on non-renewal resources, air pollution, traffic congestion, road safety, increased travel times and associated quality of life issues.

Currently there are no significant concerns with regard to air quality in Buncrana.

### **Climate change, water and marine**

Climate change is a cross cutting issue which impacts on habitats, species, fisheries, aquaculture, tourism, water quality, water safety, flood risk and people. Of increasing concern is the issue of flooding of rivers and flooding at the coast, as well as impacts such as eutrophication which can have devastating impacts on water quality, fish stocks, and human health.

## **6.6 Marine/Coastal Resource**

Buncrana is a seaside town that borders Lough Swilly for 6.963km, almost 1/3 of its boundary area. Environmental issues around the coast include the demand for coastal development and recreation that in turn can contribute to erosion, storm/flood risk issues of waste water, and the need for additional services.

Erosion and deposition are a necessary and vital part of any healthy functioning beach and dune system. Change is both inevitable and necessary (McKenna et al, 2000). Coastal development and resultant shoreline defences can be disastrous with a risk that the entire beach will be lost due to wave reflection and scouring. The loss of a dynamic environment will eventually lead to loss of the habitats that support birdlife, wetlands and the very reason coastal sites are sought after may be lost.

The marine environment may experience pressure from development within the coastal area, through the additional building of flood defences that could cause a coastal squeeze

on marine habitats, through the effects of climate change (flooding, increases in invasive species and a reduction in ocean salinity) and pollution from land side agricultural and industrial activities.

## 6.7 Material Assets

Changes to material assets including items and features of cultural and heritage value, water quality, residential and commercial developments, a wide range of community services and facilities and infrastructural services and facilities may have environmental impacts.

Increased development including residential, commercial and infrastructural works have put pressure on existing water sources with regards to quantity as well as on the treatment facilities used to treat both drinking water and wastewater.

There is a high level of vacancy within the town in respect to new and established residential and commercial development arising from the unprecedented level of building activity during the 'boom' years and the subsequent recession. The levels of vacancy are set out in section 5.4 of this report.

### Cultural Heritage including Architectural and Archaeological

Development of infrastructure, in addition to development resulting from economic growth and increasing population, can potentially impact on sites or features of architectural, archaeological, geological or cultural heritage interest. In particular certain developments on or near sites of heritage value have the potential to have a negative impact on the integrity of these sites.

The pace and scale of urban development has placed pressure on the urban form and character of certain areas of the town. Urban design and layout including residential and commercial developments have impacted on the heritage and character of the town. Urban sprawl and leapfrogging of residential developments has had a significant adverse impact on the urban form of Buncrana and such a pattern of development also gives rise to excessive and inefficient demand for dispersed infrastructural services and facilities, which has a negative impact on the vitality and viability of urban centres and leads to unsustainable patterns of travel.

### Landscape

Existing pressures on landscape (streetscape) are primarily related to impacts on sensitive views resulting from the cumulative impacts arising from siting and design of developments. Throughout the plan area consistency in the pattern, siting and design of buildings could be improved upon. The cumulative impact of insensitive development within the town can have a significant impact on both its visual amenity and character.

Objectives and policies are contained within the new draft plan to facilitate and support the implementation of local design plans and other community led projects to enhance the environment of the town. An 'Area of Special Townscape Character' is proposed within the Development Plan encompassing a large percentage of the historic core of the town that has been informed by the concentration of valuable and unique architectural heritage that can positively contribute to Buncrana's sense of place. It is also a policy of the plan to manage areas of 'Historic/Long Established Residential Areas' to protect their character, setting and design.

### Environmental Pressures in Buncrana

The following is an outline of particular environmental pressures facing Buncrana. The pressures mentioned are not exclusive to the town nor are they an exhaustive list.

- A substantial area of the Plan contains and abuts Natura 2000 sites.
- Proximity to designated Salmon waters and designated Shellfish waters.
- Due to increased development pressure and possible impacts on habitats of significant importance, there is a need to develop proactive flood risk management.
- There is a high level of residential vacancy within the town which gives rise to environmental issues in terms of sustainable use of resources, impacts on the urban character, vitality of places and the rural character within the plan periphery.
- Global issues like climate change must be considered in the development plan. Mitigation and adaptation measures should be developed to increase the capacity to manage the impacts of climate change which are far reaching but uncertain in magnitude.
- Potential adverse impacts on the River Swilly designated salmon water, Lough Swilly designated shellfish water, Lisfannon and Lady's Bay designated bathing waters.

**Inter-county and Transboundary Issues**

No inter-county or transboundary issues have arose in the Strategic Environmental Assessment process however there is a requirement for co-operation at a catchment level, should the need arise, as evidenced in the North Western International River Basin District Plan.

**Environmental Pressures**

The following table sets out the main environmental pressures within Buncrana and the items presented in the table are not exhaustive.

**Table 23: Environmental Pressures within the Buncrana Plan area**

Topic	Environmental Issue/ Pressures
<b>Biodiversity, Fauna and Flora</b>	Certain developments and activities associated with agricultural activities, forestry, urban developments, windfarms, quarries, tourism, peat extraction, commercial fishing, ports and airports and a wide range of infrastructural works (including road works, water abstraction, wastewater disposal) that are located within or close to ecologically sensitive sites can give rise to significant environmental pressures. The protection of shellfish growing areas and salmon have been highlighted as of particular importance. There are two Natura 2000 sites (one SAC and one SPA) within the plan area and 7 Natural Heritage Sites located within 15km of the plan boundary. These sites are particularly sensitive to certain development works and activities. Invasive non-native plant and animal species are a major threat to the biodiversity of the region.
<b>Population and Human Health</b>	Increases in population, their activities and settlement patterns have the potential to place increased pressure on biodiversity, water quality, landscape, cultural heritage and air. In particular, increased pressure on water quality arising from pollution can have a significant impact on human health. Individual and cumulative changes in the quality of the natural and built environment at local, regional and national level has the potential to impact to varying degrees on human health and wellbeing. High levels of radon in buildings and road safety have also been highlighted as significant issues.
<b>Soil</b>	Certain forms of development and activities including, urban and rural development, windfarms, waste disposal, afforestation, recreation and agricultural activities can place a significant pressure in soils. Changes in precipitation arising from global warming could have significant impacts on slope stability and could impact on soil and water quality.
<b>Water</b>	Development and activities can often impact on water quality including groundwater, drinking water and bathing water. Urban and rural development including wastewater and surface water disposal, landfills, quarries, contaminated lands, illegal dumping, agricultural activity, water recreational activities and afforestation can have significant impacts on water quality. Excessive inputs of nutrients, namely phosphorous and nitrogen present one of the most significant risks to water quality.
<b>Air and Noise</b>	Currently no significant impacts have been identified in respect to air quality or noise levels. Impacts arising from air pollution are primarily associated with transport and industrial emissions.

Topic	Environmental Issue/ Pressures
<b>Coast/Marine resource</b>	Inappropriate development near /onthe coast Dynamic needs of the coast (coastal squeeze) Flood risk and coastal defences Tourism impacts and sustainable management e.g. Sensitive dune systems and beach access points Litter disposal and public services (e.g. toilets) Activities in the water Coastal /Marine spatial planning
<b>Climatic factors</b>	Increased greenhouse gas emissions have been linked with climate change resulting in increases in the intensity and frequency of flooding. Of particular concern is the high dependency on the use of the car arising from a dispersed settlement pattern and lack of adequate public transport system.
<b>Renewable energy</b>	Onshore and offshore opportunities and implications Onshore – scenic amenity access roads loss of biodiversity  Offshore – impact on birds & marine mammals deployment issues grid connection locations
<b>Material Assets</b>	Material assets include a wide range of natural and man made assets. These can include infrastructural services and facilities and other items such as cultural heritage, agricultural lands quarries and coastal and water resources. Developments and activities can often impact on these assets, some of which have been referred to herein. It has been highlighted that there is a high level of residential and commercial vacancy within the town. These properties represent an underutilized resource and if left idle, they can over time deteriorate and detract from the character of urban areas.
<b>Cultural heritage, including Architectural and Archaeological</b>	Pressures can arise from certain developments and activities on or near sites of heritage value. The visual amenities and character of urban and rural areas and items of architectural, archaeological and historical importance, including shipwrecks, may be placed under pressure by such works. It is acknowledged that development works can often have a positive impact on our cultural heritage.
<b>Landscape</b>	Developments and activities can impact on visually sensitive areas including designated landscape and seascapes.
<b>Interrelationship between the above topics</b>	Cumulative impacts and interaction of above mentioned items can give rise to increased pressure on the environment. The impacts and interactions will obviously vary in extent and nature. In particular, issues in respect to water quality and climate change cross a number of environmental topic areas. Population increase and changes in people's activities and settlement patterns can impact on a wide range of the topics mentioned above.

## 7.0 Flood Risk Assessment

In recent years there has been increasing awareness of the importance of factoring the risk to people, property, the overall economy and the environment from flooding into the planning system, and the role that good planning has in avoiding and reducing such risk. The effects of climate change, such as more severe rainfall events and rising sea levels, will increase the risk of flooding and may put areas at risk that may not have flooded in the past.



Flooding from rivers and coastal waters is a natural phenomenon that cannot be entirely prevented or protected against. Flooding occurs when the capacity of a watercourse to convey water through an area is exceeded or in coastal areas when sea-water encroaches on land due to failure of coastal defences, exceptional climatic or other factors. Flooding from the sea and from rivers is probably best known, but prolonged and intense rainfall can also cause sewer flooding, and flooding to arise from overland flow and ponding in hollows. The man-made environment can exacerbate the consequences of flooding through development in a flood plain, or by building in areas where existing drainage infrastructure is deficient or inadequate. The impact on individuals and communities can be significant in terms of personal suffering and financial loss and, even where flooding has natural causes, it can have damaging effects on the environment.

Also of relevance is consideration of the consequences of climate change, which is impacting on sea levels, the nature and pattern of rainfall events and weather patterns generally. Whilst the exact impacts of change are not known, it is widely agreed that climate change will result in a higher risk of flooding both inland and at coastal locations through the raising of sea levels and the occurrence of more intense rainfall events.

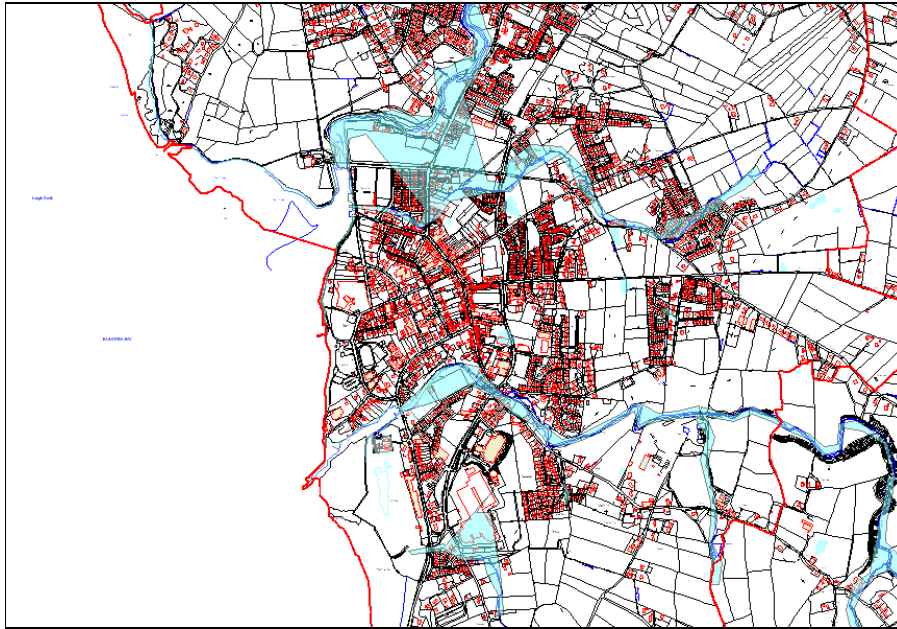
In 2007, the Floods Directive 2007/60/EC became operational. Member States are now required to assess if their watercourses and coastlines are at risk from flooding, and are required by 2015 to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this risk.

The OPW have prepared Preliminary Flood Risk Assessments (PRFA's) that have identified 'Areas with Potential Significant flood Risk' (APSR's) based on historic and predictive data and consultation with stakeholders. They are developing 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 2013 and will be followed by the Catchment Flood Risk Management Plans (CFRMP's) 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.

The PFRA for Donegal has been published and can be viewed on [www.cfram.ie](http://www.cfram.ie) or [www.myplan.ie](http://www.myplan.ie). As this is preliminary mapping, it is probable that not all flood risk areas will be identified. The focus of these studies is on risk management and not flood prevention. The DEHLG Guidelines, 'The Planning System and Flood Risk Management require that 'Development plans should address flood risk by having the necessary flood risk assessments, including mapping of flood zones, in place at the critical decision making phases and the consideration of any subsequent amendments.

In the absence of this work being completed the Councils 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.

Map 13: Preliminary Flood Risk Map



Source: [www.floodmaps.ie](http://www.floodmaps.ie), [www.myplan.ie](http://www.myplan.ie), [www.cfram.ie](http://www.cfram.ie)

#### **Strategic Flood Risk Assessment and SEA**

The SEA process addresses any likely significant effects on the environment and their amelioration, from the implementation of the Plan through all stages of the plan-making process. Flood risk identification (Stage 1) to assess whether full flood risk assessment is required, should ideally be carried out in a manner that is integrated with the SEA process rather than constituting an additional and separate process. Any subsequent stages of flood risk assessment should also be carried out in a way that is integrated with the SEA process. Within the process of preparing the draft development plan, the draft SEA environmental report considers the environmental effects of the draft plan against environmental criteria, including mitigation measures and future monitoring of effects. As with SEA, it is important to knit flood risk assessment into the development plan structure, and provide a coherent and transparent approach as to how it has been considered in making spatial planning decisions.

### **8.0 Likely evolution of the environment in the absence of the implementation of the plan**

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The Buncrana and Environs Development Plan is the principal instrument that is used to manage change in landuse in the town. This physical change can relate to the pressures and growth within Buncrana , including renewal, regeneration, protection of heritage (natural and man-made) as well as the many and varied pressures on the environment and landscape in the form of different types of development. The consideration of environmental issues is inextricably linked to economic, social and cultural considerations and accordingly environmental considerations play a central role in shaping the plan, its objectives and policies, and are manifested through the interrelationship between the Plan, the Strategic Environmental Assessment and the Appropriate Assessment.

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In the absence of the Buncrana and Environs Development Plan, the “do-nothing scenario”, the following outcomes are most likely to arise in the town:

1. There would not be a long term strategic planning framework for the proper planning and sustainable development of the town.
2. It is likely that the town would further develop in an unbalanced way thereby not realising its potential and improving the quality of life for its residents.
3. There would be no strategic identification of the key infrastructural requirements such as transport, water supplies and waste water treatment facilities and development of telecommunications. In the absence of the identification of these infrastructural requirements there would be a knock on effect on the economic, social and cultural development of the town and a slower recovery from the current economic crisis.
4. There would not be a core settlement strategy setting out a planning framework for the future development of the town. There would be no focus on the key strategic areas for future population growth. This in turn would lead to an exacerbation of the dispersal of population within the plan area which weakens the existing urban structure and discourages the economies of scale required to justify the provision of services. It also makes the town less attractive to invest in.
5. The socio-economic development of the town will occur on an ad-hoc basis.
6. Less protection will be afforded to the natural receiving environment within the town and the wider hinterland.
7. The ecological, cultural, architectural and archaeological heritage will not be sufficiently protected at a strategic level.
8. Key environmental issues such as the protection of water quality may not be sufficiently considered due to the absence of a parent document dealing strategically with the issue.
9. Non-implementation of the plan could result in the degradation of biodiversity that on a cumulative basis represent an important environmental resource. In areas of special biodiversity interest there could be a detrimental impact to the high level of diversity that exists as there would be significantly reduced protection to lands for example at Porthaw and to river corridors.
10. Continued fragmented and dispersed settlement pattern particularly in the rural environs with a continued lack of co-ordinated communal public services and infrastructure.
11. Visual encroachment of development onto visually sensitive lands.
12. Potential negative impact on adjoining Natura 2000 sites (SPA 004075 and SAC 000166), on designated Salmon waters and on designated Lough Swilly shellfish waters.

The above demonstrates that to proceed in the absence of the implementation of a Development Plan would be contrary to the proper planning and sustainable development of the Buncrana and Environs Plan area and the wider hinterland.

## **9.0 Monitoring, Environmental Objectives, Indicators and Targets**

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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 shall be based on the environmental objectives, targets and indicators set out below.

**Table 24: 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) that could be impacted by the Plan.	Number and nature of developments permitted in or within the 15km Buffer of the Natura 2000 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 Ludden Coastal Strip.	Conservation status of habitats and species as reported by NPWS.  Annual AER report prepared by the Councils for the EPA wastewater treatment discharge license.	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 Councils for the EPA wastewater treatment discharge license.	Incorporate the Pollution Reduction Programmes for Shellfish Waters.  Improve bathing water quality.
B4: 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 incidences 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>
W1: Protect and enhance the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems	Water quality monitoring results by the EPA and County Lab, for: <ul style="list-style-type: none"> <li>• Surface water ecological and chemical status.</li> </ul>	Protect and restore areas identified in the NWIRBD and achieve 'good' status by 2015 in accordance with the NWIRBD objectives.

<p>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>	<ul style="list-style-type: none"> <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>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>
<p>W3: Promote sustainable water use based on a long-term protection of available water resources.</p>	<p>Water meter readings.</p>	<p>Improve Water Conservation Reduce unaccounted for water.</p>
<p>W4: Reduce progressively discharges of polluting substances to waters.</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>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>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 developments.</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 modes of travel.</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>Investment in public transport.</p>	<p>Reduce road traffic in line with Smarter Travel, A Sustainable Transport Future.</p> <p>Increased investment in cycle paths and footpaths.</p> <p>Consider recommendations of OREDP in Off shore wind energy developments.</p>
<b>Material Assets:</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
<p>M1: Maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources.</p>	<p>Availability and quality of community related infrastructure, services and facilities and status of environmental resources.</p>	
<p>M2: Avoid flood risk and/or coastal erosion in selecting sites for development.</p>	<p>Number of community related developments on vulnerable coastal sites/ sites prone to flooding.</p>	<p>Improved flood risk management in areas prone to flooding.</p> <p>Reduction in incidents of flood damage to premises.</p>
<b>Cultural Heritage</b>		
<b>Environmental Objectives</b>	<b>Indicators</b>	<b>Targets</b>
<p>C1: Promote the protection and conservation of the cultural, including architectural and archaeological, heritage.</p>	<p>Number of structures on RPS in relation to Ministerial Recommendations arising from NIAH County inventory.</p> <p>Number of ACAs.</p> <p>Number of Monuments on the RMP and areas of</p>	<p>To increase the number of protected structures in line with ministerial recommendations arising from NIAH surveys.</p> <p>To conserve both townscapes and landscapes of value.</p> <p>To maintain and increase the number of archaeological</p>

	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.	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 Landscapes (townscape) and features within them and avoid adverse impacts, including those that contribute to the character of Buncrana.	Preparation of a Landscape Character Assessment for the County and including Buncrana.	Conserve and enhance the townscape and landscape of Buncrana.  Appropriate Heritage Appraisal and Landscape Capacity Assessment to inform any future development within the plan area.

### 9.1 Assessment of Zoning, Zoning Objectives, Objectives and Policies

This section assesses the potential effects of implementing the Development Plan on the environment. This is achieved through the examination of each objective, policy and the land use zonings proposed in the Plan under headings that indicate whether the implementation of the Plan is likely to improve, conflict or have a neutral effect on the environment (table below). These are set against Strategic Environmental Objectives (SEOs) that have been derived from National, International and international policy documents, strategies and Guidelines, and based on emerging environmental conditions within the Plan area (table below).

In addition to the assessment matrix set out in table 27 of this report, the environmental issues and Strategic Environmental Objectives were considered in detail throughout the entire Plan review process in development of the objectives, policies and zoning objectives of the Plan. Some of the specific policy references that contain reference to environmental measures are contained within table 28 at the end of this report, whilst other considerations would have resulted in amendments to objectives and policies, additional objectives and policies and also deletion of objectives and policies during the SEA process.

**Table 25: Categories for Assessment**

<b>Probable Conflict</b> with status of SEOs- unlikely to be mitigated to an *acceptable level	<b>Potential Conflict</b> with status of SEOs – likely to be mitigated to an *acceptable level	<b>Uncertain</b> interaction with status of SEOs	<b>Neutral</b> interaction with status of SEOs	<b>No Likely</b> interaction with status of SEOs	<b>Likely to Improve</b> the status of the SEOs
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\*An acceptable level means where the conflict with the status of the SEO would be rendered benign or reduce through mitigation measures and thereby become acceptable in terms of well established principles of proper planning and sustainable development.

**Table 26: Strategic Environmental Objectives**

<b>Environmental Component</b>	<b>SEO code</b>	<b>Strategic Environmental Objective</b>
<b>Biodiversity, Flora and Fauna</b>	<b>B1</b>	Ensure compliance with the Habitats Directive by protecting all Natura 2000 sites and habitats of species (SACs and SPAs) within the Plan area and its environs.
<b>Biodiversity, Flora and Fauna</b>	<b>B2</b>	Conserve and enhance the biodiversity of key areas and of biodiversity corridors, in particular: Porthaw, Mill River, Crana River and Luddan coastal strip.
<b>Biodiversity, Flora and Fauna</b>	<b>B3</b>	Conserve and enhance the diversity of habitats and protected species and promote the sustainable management of these areas.
<b>Biodiversity, Flora and Fauna</b>	<b>B4</b>	Protect the marine environment (including designated shellfish waters) and promote integrated coastal zone management strategies.
<b>Population</b>	<b>P1</b>	Facilitate a good quality of life based on high-quality residential, working and recreational environments.
<b>Population</b>	<b>P2</b>	Facilitate more sustainable travel patterns.
<b>Human Health</b>	<b>H1</b>	Minimise noise, vibration and emissions from traffic, industrial processes and extractive industry.
<b>Soil (including Minerals)</b>	<b>S1</b>	Protect and maintain the quality of soils.
<b>Soil (including Minerals)</b>	<b>S2</b>	Protect and conserve geological sites.
<b>Soil (including Minerals)</b>	<b>S3</b>	Give preference to the re-use of brownfield lands, rather than developing greenfield lands.
<b>Soil (including Minerals)</b>	<b>S4</b>	Minimise the consumption of non-renewable sand, gravel and rock deposits.
<b>Soil (including Minerals)</b>	<b>S5</b>	Minimise the amount of waste to landfill.
<b>Water</b>	<b>W1</b>	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).
<b>Water</b>	<b>W2</b>	Protect the quality of surface and groundwater quality as sources of drinking water, assets for amenity, and recreation and ecosystem purposes.
<b>Water</b>	<b>W3</b>	Promote sustainable water use based on a long-term protection of available water resources.
<b>Water</b>	<b>W4</b>	Reduce progressively discharges of polluting substances to waters.
<b>Water</b>	<b>W5</b>	Manage the risk of coastal, estuarine and fluvial flooding.  Manage the risk of droughts.
<b>Coastal/Marine</b>	<b>CM1</b>	Avoid coastal erosion and promote coastal protection.
<b>Air/climatic factors</b>	<b>A1</b>	Support implementation of National Climate Strategy 2007-2012, (currently under review and due June 2013).

<b>Environmental Component</b>	<b>SEO code</b>	<b>Strategic Environmental Objective</b>
		Reduce all forms of air pollution.
<b>Air/climatic factors</b>	<b>A2</b>	Promote and support a shift from fossil fuel dependent energy to more sustainable energy.  Promote and support a shift from fossil fuel dependant vehicles to more sustainable modes of travel.
<b>Material Assets</b>	<b>M1</b>	Maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources.
<b>Material Assets</b>	<b>M2</b>	Avoid flood risk and/or coastal erosion in selecting sites for development.
<b>Cultural Heritage</b>	<b>C1</b>	Promote the protection and conservation of the cultural, including architectural and archaeological, heritage.
<b>Landscape</b>	<b>L1</b>	Conserve and enhance valued natural and historic Landscapes (including townscapes) and features within them and avoid adverse impacts, including those that contribute to the character of Buncrana.

**Table 27: Assessment of Objectives, Policies and Zonings of the Draft Buncrana and Environs Development Plan**

Objectives and Policies	Probable Conflict with status of SEOs - unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
<b>Chapter 2: Core Strategy</b>						
CS-O-1				B1, B2, B3, B4, P1, H1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P2, S1
CS-O-2			S1, S2	H1, CM1, A1, A2, M2	B1, B2, B3, B4, S4, S5, W1, W2, W3, W4, W5, C1, L1	P1, P2, S3, M1
CS-O-3			W1, W2, C1, L1	B1, B2, B3, B4, H1, W3, W4, CM1, A1, A2	S2, S4, S5	P1, P2, S1, S3, M1, M2
CS-O-4			W4, CM1, C1, L1	P2, H1, S1, S2, S3, S4, S5	A1, A2	B1, B2, B3, B4, P1, W1, W2, W3, W5, M1, M2
CS-O-5				B1, B2, B3, B4, B5, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1.
CS-O-6				B1, B2, B3, B4, B5, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
CS-O-7				B1, B2, B3, B4, B5, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, M1, M2, C1		P1, P2, H1, A1, A2, L1
CS-O-8				B1, B2, B3, B4, B5, S3, S4, S5, CM1, A1, A2, M1, M2, C1, L1		S1, S2, W1, W2, W3, W4, W5
CS-O-9				B1, B2, B3, B4, B5, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1
CS-O-10				B1, B2, B3, B4, B5, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1,		C1, L1

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				A2, M1, M2		
CS-P-1			W1, W2, C1, L1	B1, B2, B3, B4, H1, W3, W4, CM1, A1, A2	S2, S4, S5	P1, P2, S1, S3, M1, M2
CS-P-2				B1, B2, B3, B4, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A2, M2	C1, L1	P1, P2, H1, A1, M1
CS-P-3				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CS-P-4				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CS-P-5				B1, B2, B3, B4, P2, H1, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1	M1	P1, S1, S2, S3, L1
<b>Chapter 3: Economic Development</b>						
E-O-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, C2		
E-O-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, C2		
E-O-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-O-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2,		

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				C1, L1		
E-O-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-O-6				CM1, A1, A2	B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, W5, M1, M2, C1, L1	S5, W1, W2, W3, W4
E-O-7				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		L1
E-O-8				B1, B2, B3, B4, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, M1, M2, C1		P1, P2, A1, A2
E-O-9*			S1, S4,	B1, B2, B3, W2	B4, H1, S2, S3, S5, W1, W3, W4, W5, CM1, M2, C1, L1	P1, A1, A2, M1,
E-P-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-2			B1, B2, B3, B4, S2, S4, M2, C1		H1, S5, W1, W2, W3, W4, W5, CM1, A1, A2	P1, P2, S1, S3, M1, L1
E-P-3			B1, B2, B3, B4, S2, S4, M2, C1		S5, CM1, A1, A2	P1, H1, P2, S1, S3, W1, W2, W3, W4, W5, M1, L1
E-P-4*				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5,		

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-6				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-7					B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1	
E-P-8				P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		B1, B2, B3, B4, C1, L1
E-P-9					B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1	
E-P-10					B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2	C1, L1
E-P-11					B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1	W5
E-P-12			B1, B2, B3, B4, W5		P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1	
E-P-13			B1, B2, B3, B4, W5		P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1	L1

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
E-P-14			W5		B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1	
E-P-15			W5		B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1	
E-P-16			W5		B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1	
E-P-17			B1, S1, S3,	B2, B3, S4, L1	B4, P2, H1,S2,S5, W1, W2, W3, W5, CM1, A1, A2, M1, M2	P1, M1, M2, W4, C1
E-P-18				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-19				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-20				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-21				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-22				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5,		

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
E-P-23				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1.
E-P-24				B1, B2, B4, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, M2, C1		B3, P1, P2, A1, A2, M1, L1
E-P-25			B4 CM1	B1, B2, B3, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, A1, A2, M1, M2, C1, L1		
E-P-26				B1, B2, B3, B4, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		P1, P2, H1, M1
E-P-27*				B1, B2, B3, B4, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		P1, P2, H1, M1
<b>Chapter 4: Retail</b>						
R-O-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-O-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-O-3				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
R-O-4				B1, B2, B3, B4, P2, H1,		P1



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				S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-O-5				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
R-O-6				B1, B2, B3, B4, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1, P2
R-O-7				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-O-8				B1, B2, B3, B4, H1, S2, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, P2, S1, S3, L1
R-O-9				B1, B2, B3, B4, H1, S2, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, P2, S1, S3, L1
R-O-10				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-P-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-P-2*				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		P1, C1, L1

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
R-P-3				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		P1, C1, L1
R-P-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-P-5*				B1, B2, B3, B4, H1, S2, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1		P1, P2, S1, S3, M1, L1
R-P-6*				B1, B2, B3, B4, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A2, M1, M2, C1, L1		P1, P2, A1
R-P-7				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		L1
R-P-8*				B1, B2, B3, B4, H1, S1, S2, S4, S5, W1, W2, W3, W4, W5, CM1, M2		P1, P2, S3, A1, A2, M1, C1, L1
R-P-9				B1, B2, B3, B4, H1, S2, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1		P1, P2, S1, S3, M1, L1
R-P-10				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-P-11				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2,		L1

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				C1		
R-P-12				B1, B2, B3, B4, P1, P2, H1, S2, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		S1, S3, L1
R-P-13				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
R-P-14				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
R-P-15				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
<b>Chapter 5: Built and Natural Heritage</b>						
<b>Built Heritage Objectives</b>						
BH-O-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1
BH-O-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
BH-O-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1
BH-P-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
BH-P-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1
BH-P-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1
BH-P-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1
BH-P-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1
BH-P-6*				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		C1, L1
BH-P-7				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
BH-P-8				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
BH-P-9				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
BH-P-10				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
<b>Archaeological Heritage Objective</b>						
AH-O-1				B1, B2, B3, B4, P2, H1,		P1, L1

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		
AH-P-1				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
AH-P-2				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
AH-P-3				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
<b>Natural Heritage Objectives</b>						
NH-O-1				W2, W3, W5, A1, A2, M1, M2, C1, L1	P2, H1, S3, S4, S5	B1, B2, B3, B4, P1, S1, S2, W1, W4, CM1
NH-O-2				B4, P2, H1, S1, S3, S4, S5, W3, M1, M2, C1, L1	S2, CM1, A1, A2	B1, B2, B3, P1, W1, W2, W4
NH-O-3				P1, P2, H1, S3, S4, S5, W3, W5, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4, S1, S2, W1, W2, W4, CM1
NH-O-4				P2, H1, S3, S4, S5, A1, A2, M1, C1, L1		B1, B2, B3, B4, P1, S1, S2, W1, W2, W3, W4, W5, CM1, M2
NH-O-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		L1
NH-O-6				P1, P2, H1, S3, S4, S5, W3, W5, A1, A2, M1, M2		B1, B2, B3, B4, S1, S2, W1, W2, W4, CM1, C1, L1
NH-P-1*				P1, P2, H1, S1, S2, S3, S4, S5, CM1, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4, W1, W2, W3, W4, W5
NH-P-2*				P1, P2, H1, S1, S2, S3,		B1, B2, B3, B4, W1, W2,

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				S4, S5, CM1, A1, A2, M1, M2, C1, L1		W3, W4, W5
NH-P-3*				P1, P2, H1, S1, S2, S3, S4, S5, CM1, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4, W1, W2, W3, W4, W5
NH-P-4*				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		L1
NH-P-5*				P1, P2, H1, S3, S4, S5, W3, W5, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4, S1, S2, W1, W2, W4, CM1
NH-P-6*				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		L1
NH-P-7*				P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4
NH-P-8*				B1, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		B2, B3, L1
NH-P-9*				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		L1
NH-P-10*				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
NH-P-11*				B1, B2, B3, B4, P1, P2, H1, S3, S4, S5, W1, W2,		S1, S2

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				W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
<b>Surface Water</b>						
SW-O-1				P1, P2, H1, S3, S4, S5, W3, W5, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4, S1, S2, W1, W2, W4, CM1
SW-P-1				P1, P2, H1, S3, S4, S5, W3, W5, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4, S1, S2, W1, W2, W4, CM1
SW-P-2				P1, P2, H1, S3, S4, S5, W3, W5, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4, S1, S2, W1, W2, W4, CM1,
<b>INFRASTRUCTURE</b>						
<b>TRANSPORT</b>						
RD-O-1		B1, B2, B3, B4, S1, S2, W1, A1, A2	P1, P2, H1, S3, S4, C1, L1	S5, W2, W3, CM1, M1, M2	W4, W5	
*Mitigation: Recommend that objective be amended so that it reads as follows: " To protect the corridors and routes and acquire the lands necessary for transportation improvement projects as identified in the Land Use Zoning Map 1 (A), subject to the environmental, safety and other planning considerations."						
RD-O-2		B1, B2, B3, B4, S1, S2, W1, A1, A2	P1, P2, H1, S3, S4, C1, L1	S5, W2, W3, CM1, M1, M2	W4, W5	
*No mitigation required: any proposals for physical links between these towns shall be subject to separate detailed applications and rigorous assessment.						
RD-O-3			P1, P2, H1, S1, S2, S3, W1, A1, A2, C1, L1	B1, B2, B3, B4, W3, W5, CM1, M2	S4, S5, W2, W4	M1
RD-P-1		B1, B2, B3, B4, S1, S2, W1, A1, A2	P1, P2, H1, S3, S4, C1, L1	S5, W2, W3, CM1, M1, M2	W4, W5	
*No mitigation required: any proposals for physical links between these towns shall be subject to separate detailed applications and rigorous assessment.						
RD-P-2		B1, B2, B3, B4, S1, S2, W1, A1, A2	P1, P2, H1, S3, S4, C1, L1	S5, W2, W3, CM1, M1, M2	W4, W5	
*No mitigation required: any proposals for physical links between these towns shall be subject to separate detailed applications and rigorous assessment.						
RD-P-3				B1, B2, B3, B4, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, M2, C1, L1		P1, P2, A1, A2, M1
RD-P-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2,		

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				C1, L1		
RD-P-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
RD-P-6				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
RD-P-7				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
RD-P-8				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
RD-P-9				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
RD-P-10				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
RD-P-11				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
<b>WATER AND WASTE WATER</b>						
WW-O-1				B1, B2, B3, B4, P2, H1,		P1, W1, W2, W3, W4,



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				S1, S2, S3, S4, S5, W5, CM1, A1, A2, M1, M2, C1, L1		
WW-O-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		S5,W1,
WW-P-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W5, CM1, A1, A2, M1, M2, C1, L1		W1, W2, W3, W4,
WW-P-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		S5,W1,
WW-P-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		S5,W1,
WW-P-4			B1, B2		S2, S3, S4, S5, W3, W5, A1, A2, M1, M2, L1, C1	S1, W1, W2, W4, B4
<b>WASTE MANAGEMENT</b>						
WM-O-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		S5
WM-O-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		S5
WM-P-1*				B1, B2, B3, B4, P1, P2,		S5

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				H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
<b>TELECOMMUNICATIONS</b>						
TC-O-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
TC-P-1*				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1, S5
TC-P-2				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
TC-P-3			P1, C1, L1	B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2		
TC-P-4		B1, B2, B3, P1, C1, L1	B4, S1, S2, W1, W2, M1	P2, H1, S3, S4, S5, W3, W4, W5, CM1, A1, A2, M2		
*Mitigation: Recommend that policy be reworded as follows " It is the policy of the Councils 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."						
T-P-5		B1, B2, B3, P1, C1, L1	B4, S1, S2, W1, W2, M1	P2, H1, S3, S4, S5, W3, W4, W5, CM1, A1, A2, M2,		
*Mitigation: Recommend that policy be reworded as follows "it is the policy of the Councils to consider proposals to replace telecommunications support structures within Areas of 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."						
T-P-6				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5,		L1

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				W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		
T-P-7				B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		B1, B2, B3, L1
<b>COMMUNITY, EDUCATION AND HEALTH</b>						
CEH-O-1				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CEH-O-2				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CEH-O-3				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CEH-O-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CEH-P-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CEH-P-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CEH-P-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5,		

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				CM1, A1, A2, M1, M2, C1, L1		
CEH-P-4				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		P1, M1
CEH-P-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CEH-P-6				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		P1, M1
CEH-P-7				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, CM1, A1, A2, M2, C1, L1		P1, W1, W2, W3, W4, W5, M1
<b>HOUSING</b>						
H-O-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-O-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-O-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-O-4				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1

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H-O-5				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
H-O-6				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
H-O-7				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
H-O-8				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
H-O-9				B1, B2, B3, B4, P2, H1, S2, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1, S1, S3
H-P-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5,		

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				CM1, A1, A2, M1,M2, C1, L1		
H-P-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1,M2, C1, L1		
H-P-6				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1,M2, C1	L1	
H-P-7*				B1, B2, B3, B4, P2, H1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, S1, L1
H-P-8				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1,M2, C1, L1		
H-P-9				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		P1, M1
H-P-10				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		P1, M1,
H-P-11				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1		P1, M1,L1
H-P-12				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		P1, M1
H-P-13*				B1, B2, B3, B4, H1, S1,		P1, P2, M1,

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		
H-P-14				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M2, C1, L1		P1, M1
H-P-15				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-16				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-17				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
H-P-18				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
H-P-19				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-20				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-21				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1,		P1

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				A1, A2, M1, M2, C1, L1		
H-P-22				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
H-P-23				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-24				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-25				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-26				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-27				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-28				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
H-P-29*		B1, B2, B3, B4, P2, S1, S3, CM1, L1	W1, W2, W3, W4, W5,	P1, H1, S2, S4, S5, A1, A2, M1, M2, C1		
*No mitigation required: any proposals for physical links between these towns shall be subject to separate detailed applications and rigorous assessment.						



Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
CHILDCARE						
CH-O-1				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CH-O-2				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CH-O-3				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CH-O-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CH-O-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CH-O-6				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
CH-O-7				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CH-P-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CH-P-2				B1, B2, B3, B4, H1, S1,		P1, P2

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
CH-P-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
<b>FLOODING</b>						
F-O-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		W5
F-O-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		W5
F-O-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		W5
F-O-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A2, M1, M2, C1, L1		W5, A1
F-O-5				B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		B1, B2, B3, W5
F-P-1				B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		B1, B2, B3, W5
F-P-2*				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, C1, L1		W5, M2
F-P-3*				B1, B2, B3, P2, H1, S1,		B4, P1, W1, W2, W5,

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				S2, S3, S4, S5, W3, W4, A1, A2, M1, C1, L1		CM1, M2
F-P-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		W5
F-P-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		W5
F-P-6				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		W5
F-P-7				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		P1, W5
F-P-8*				B1, B2, B3, P2, H1, S1, S2, S3, S4, S5, W3, W4, A1, A2, M1, C1, L1		B4, P1, W1, W2, W5, CM1, M2
F-P-9*				B1, B2, B3, P2, H1, S1, S2, S3, S4, S5, W3, W4, A1, A2, M1, C1, L1		B4, P1, W1, W2, W5, CM1, M2
F-P-10				P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, CM1, A1, A2, M1, M2, C1, L1		B1, B2, B3, B4, P1, W5
<b>HOUSING STRATEGY</b>						
HS-O-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
HS-O-2				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
HS-O-3				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
HS-O-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
HS-O-5				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
HS-O-6				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
HS-O-7				B1, B2, B3, B4, P2, H1, S2, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1, S1, S3
HS-P-1				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		
HS-P-2				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1		P1, L1
HS-P-3				B1, B2, B3, B4, P2, H1, S1, S2, S3, S4, S5, W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		P1
HS-P-4				B1, B2, B3, B4, P1, P2, H1, S1, S2, S3, S4, S5,		

Objectives and Policies	Probable Conflict with status of SEOs- unlikely to be mitigated to an acceptable level	Potential Conflict with 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 the status of SEOs
				W1, W2, W3, W4, W5, CM1, A1, A2, M1, M2, C1, L1		

\* Amended as a result of Appropriate Assessment

## Conclusion

It is a requirement of the Planning and Development (SEA) Regulations 2004 (Schedule 2B) to set out measures to offset any potential negative impact on the environment as a result of implementing the policies and objectives of the Plan. Table no. 27 demonstrates this assessment and a number of objectives and policies have been identified as having a potential conflict with the Strategic Environmental Objectives of the Plan and where this has arose, mitigation measures are proposed.

The SEA of the Draft Plan was carried out in-house within the wider Plan drafting team; as such environmental vulnerabilities, issues and constraints were considered in the first instance through the plan writing and zoning process and in this regard formulated with the explicit intention of protecting the environment and avoiding potentially adverse environmental impacts. The 'Assessment' proper as outlined in table 27 of this document assessed each aim, objective and policy individually and recommended mitigation (changes) are identified in table 28, namely policy changes to telecommunications policies numbered TC-P-4 and TC-P-5, and transport objective RD-O-1.

The assessment of objectives and policies contained within table 27 indicate the following:

- The implementation of the draft Buncrana and Environs Development Plan will have an overall positive effect on the environmental status of Buncrana;
- Whilst a number of objectives and policies would have an overall positive impact, there may be certain elements of them that could also contain potential for conflict; where this arises the objectives and policies will be mitigated to an acceptable level\*, this mitigation is generally dependant on detailed assessment of items against a swathe of policies, and mitigation measures specific to the issue.
- The impact of some objectives and policies may be uncertain, the impact is possible and would be dependant on detailed assessment of items against a swathe of policies.
- The Implementation of the Plan will not give rise to probable environmental impacts that are unlikely to be mitigated to an acceptable level\*.

\*An acceptable level means where the conflict with the status of the SEO would be rendered benign or reduce through mitigation measures and thereby become acceptable in terms of well established principles of proper planning and sustainable development.

There are objectives and policies identified as having potential impact on Strategic Environmental Objectives (SEOs) and uncertain interaction with the SEOs, the majority of these shall be subject to further detailed assessment and mitigation at implementation stage through best practice in the development management process and implementation of the Plan. In addition, certain individual applications for developments within the Plan area may be subject to individual Environmental Impact Assessments and Appropriate Assessments.

## 9.2 Mitigation Measures

The mitigation measures referred to within table 27 will act to prevent, reduce and as fully as possible offset any significant effects of implementing the Buncrana and Environs Development Plan.

## 10.0 Incorporating Environmental Issues into Buncrana and Environs Development Plan

The SEA process shaped the drafting of the entire Plan and the table below outlines how the environmental issues raised throughout the SEA process were incorporated into the Plan as objectives, policies or otherwise. The table 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. Nor does the table show how the SEA process significantly shaped the zonings within the Development Plan. Each land area was assessed against the Strategic Environmental Objectives as set out in Table 26; this highlighted numerous environmental issues both stand-alone and cumulative within Buncrana and served to inform the zoning areas and zoning objectives.

**Table 28: Incorporation of Environmental Issues into the Buncrana and Environs Development Plan**

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required (final check)
<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, TC-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 15km of the plan boundary	CS-O-4, E-P-9, 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 Atlantic 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	
<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,	CS-P-5, H-P-1, H-P-3, H-P-5, H-	

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required (final check)
distribution of CDP (RPG) Population targets.	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*	
<b>Water</b>		
Impact of development works on water quality	CS-O-4, CS-O-8, E-O-6, WW-O-1	
Alignment with objectives and policies of the NWIRBD Plan.	CS-O-8, SP-1	
Wastewater, drinking water and bathing water quality.	CS-O-4, CS-O-8, E-O-6, WW-O-2, WW-P-2	
<b>Air and Climate Change</b>		
Climate Change and Air Quality	CS-O-7	
Limiting Greenhouse gas emissions and reducing dependency on fossil fuels.		
<b>Cultural Heritage</b>		
Impact of development works	CS-O-10	
Identification and protection of geological sites,	NH-P-11	
Protection of architectural and archaeological structures and sites.	CS-O-9, 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	TC-P-4 It is the policy of the Councils 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



Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required (final check)
		<p>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 Councils to consider proposals to replace telecommunications support structures within Areas of 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.</p>
Identification, Classification and protection of landscape	CS-O-9, 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	
<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		
Soils	CS-O-1, CS-O-2, CS-O-3, CS-P-1, CS-P-4, H-P-7	
Employment and	CS-O-1, CS-O-5, E-O-2, E-O-3,	

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required (final check)
Enterprise Developments	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 and E-P-27*	

\*new or reworded objectives and policies resulting from the AA process.