
Donegal County Council



SEA STATEMENT

ON THE

STRATEGIC ENVIRONMENTAL ASSESSMENT

OF THE

COUNTY DONEGAL DEVELOPMENT PLAN

2012-2018

3rd August 2012

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SECTION 1: INTRODUCTION

1.1 TERMS OF REFERENCE

This is the Strategic Environmental Assessment (SEA) Statement of the Donegal County Development Plan 2012-2018.

1.2 SEA DEFINITION

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

1.3 LEGISLATIVE CONTEXT

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

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

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

1.4 CONTENT OF THE SEA STATEMENT

The SEA Statement is required to include information summarising:

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

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

1.5 IMPLICATIONS OF SEA FOR THE COUNTY DONEGAL DEVELOPMENT PLAN 2012-2018

As a result of the aforementioned legislation, the County Donegal Development Plan 2012-2018 was required to undergo SEA. This process included pre-scoping and formal scoping with stakeholders before the findings of the SEA was expressed in an Environmental Report which accompanied the Draft County Donegal Development Plan 2012-2018, which was on public display from the 13th June 2011 to 22nd August 2011. Following consideration of the submissions and observations received during that public consultation process, it was decided to amend the Draft Plan. The amendments included "Material Alterations" that were subjected to further SEA to take account of changes being made to the Draft Plan. The findings of that SEA was presented in a report that accompanied the proposed Material Alterations that were on public display between 2nd and 30th March 2012. A report on the submissions and observations made in respect of the proposed Material Alterations and the SEA was presented in a Manager's Report to the Members of Donegal County Council. Having considered the proposed Material Alterations and the SEA Report, it was resolved by Members to make the County Donegal Development Plan 2012-2018 at an adjourned Council meeting on the 6th June 2012. Upon adoption of the County Donegal Development Plan 2012-2018 the original Environmental Report was updated, using the Environmental Report on the Material Alterations, to form a final Environmental Report, which is available alongside the adopted Plan. At each stage of the process the Elected Members took into account the findings of the Environmental Report on the Draft Plan and the subsequent Strategic Environmental Assessment of the proposed Material Alterations to the Draft County Donegal Development Plan 2012-2018.

SECTION 2: HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE PLAN

2.1 KEY STEPS IN THE SEA PROCESS

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

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

Key Steps	Dates
Pre- Scoping SEA report	Period prior to July 2010
Pre-Draft Consultation/Scoping Report for SEA/Appropriate Assessment	9th July to 24th September 2010
Manager's Report on Pre-Draft Consultation/SEA/Appropriate Assessment	1st November 2010
Draft Plan – Public Consultation on Draft Plan/Environmental Report/Appropriate Assessment	13th June to 22nd August 2011
Manager's Report on Draft Plan/Environmental Report/Appropriate Assessment	1st November 2011
Special Council Meeting – Resolved to make plan, subject to proposed Material Alterations.	16th January 2012
Public Consultation on Material Alterations/Environmental Report/Appropriate Assessment	2nd March to 30th March 2012
Manager's Report on Material Alterations/Environmental Report/Appropriate Assessment	4th May 2012
Adjourned May Council Meeting (Resolved to make Plan)	6th June 2012

2.2 CONSULTATIONS

As part of the scoping exercise a pre-scoping report was prepared and circulated to the following three 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)
- Cross-directorate within the Council

Submissions were received in response to the pre-scoping paper from the 3 statutory consultees and the Donegal County Council, National Road Design Office. All submissions were taken into account during the formulation of the scoping report. The Scoping Report for SEA was then presented as part of the Pre-Draft Plan consultation that was undertaken between the 9th July and 24th September 2010. The submissions received helped shape the Strategic Environmental Report that informed the Draft Plan and both the Report and Draft Plan were made available during the public consultation period between 13th June and 22nd August 2011. The submissions to the Draft Plan and the Environmental Report were considered and changes were proposed that included non-material and material alterations to the Draft Development Plan. A Strategic Environmental Assessment of the proposed Material Alterations to the Draft Plan was made and expressed in an environmental report on the proposed changes, which was made available during the final public consultation period on the proposed Material Alterations that took place during March 2012. All submissions were considered before the plan was finally adopted on 6th June 2012. Thus, all submissions were taken into consideration at each stage of decision making.

2.3 ENVIRONMENTAL VULNERABILITIES

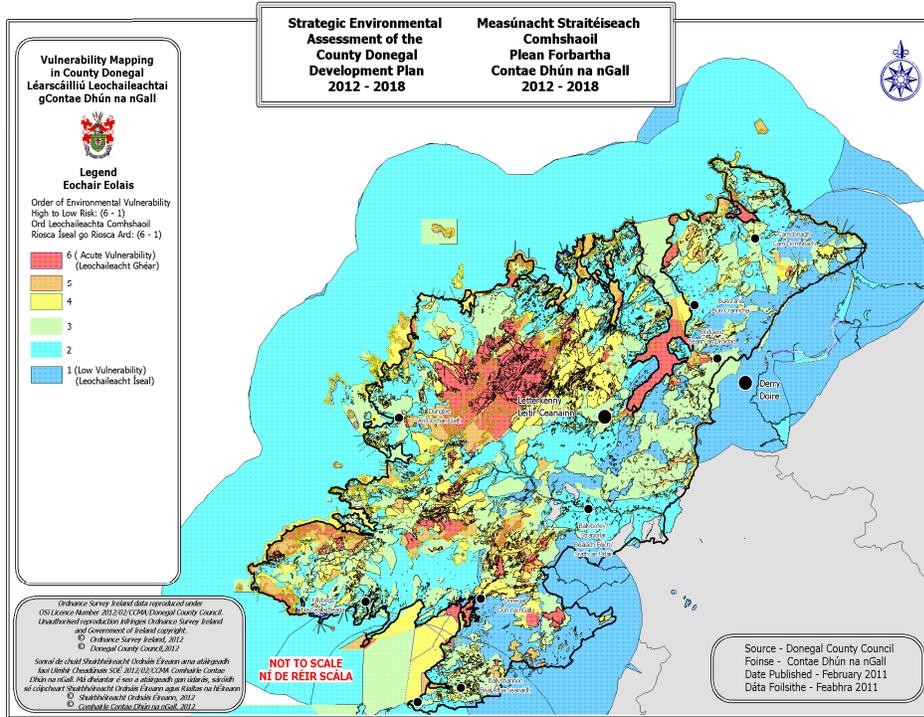
Environmental considerations were integrated into the Draft Plan before it was placed on public display for the first time. Environmental vulnerabilities were mapped in order to identify which areas of the County are most sensitive to development and would be most likely to suffer adverse effects if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

- Natura 2000 (Special Areas of Conservation (SAC's) and Special Protection Areas (SPAs)) including Pearl Mussel populations,
- Freshwater Pearl Mussel Population. (International)
- Natural Heritage Area (NHA),
- Proposed Natural Heritage Area (pNHA),
- Ramsar Sites,
- Nature Reserves,
- National Parks,
- Broadleaved woodland,
- Record of Protected Structures (RPS),
- Monuments in State care,
- Sites and Monuments Record,
- Archaeological monuments
- Archaeological complexes,
- Especially High Scenic Amenity (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,
- North West International River Basin District (NWIRBD coastal, Transitional, lakes and river, and groundwater bodies at Risk and
- Shellfish catchments.

Environmental Vulnerabilities within the County were identified during the gathering of baseline data for the environmental report and those that have the data available spatially were mapped individually and also compiled into a 'Map of Vulnerabilities' (See Map1 below). In order to map the environmental vulnerabilities in the County, a total of 39 layers of environmental data were overlaid spatially and weighted in order to show an output range of environmental vulnerability ranging from High (red) to blue (low). The Environmental Vulnerabilities GIS mapping displayed environmental data on layers and enabled the identification of areas of high vulnerability that were 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 County. The sequential weightings system gave European Natura 2000 sites a value of 15, National, Regional & Local datasets a rating value of 10 and the 15km buffer zone around Natura 2000 sites a value of 5. The vulnerabilities Map (See Map1 below) shows where the most environmentally sensitive areas of the County (red) to the least environmentally sensitive (blue) are located. 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 Draft Plan with environmental vulnerabilities.

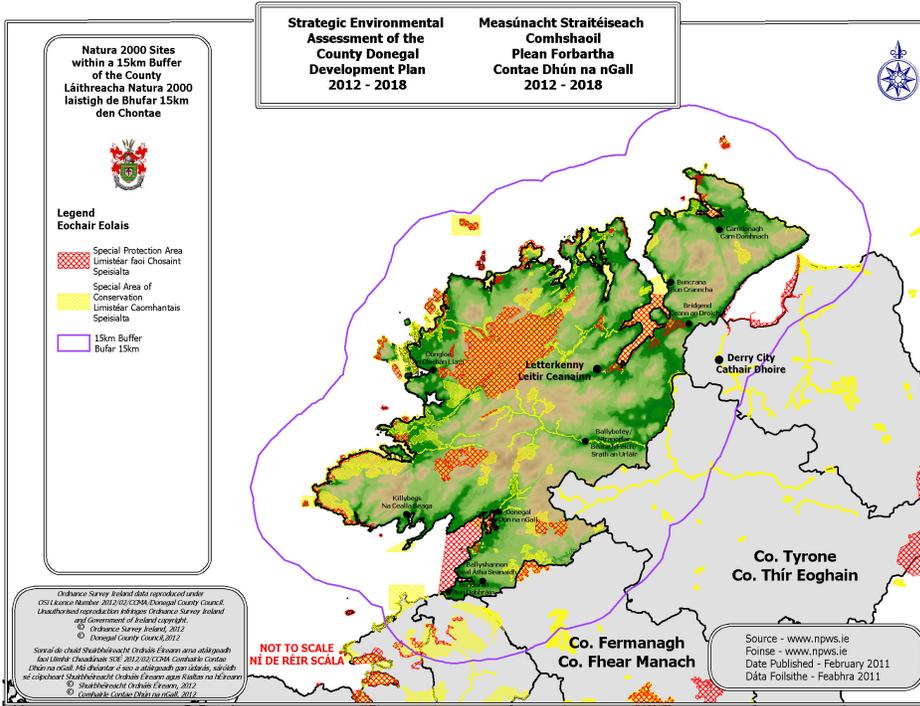
Map 1: Vulnerability Mapping in County Donegal



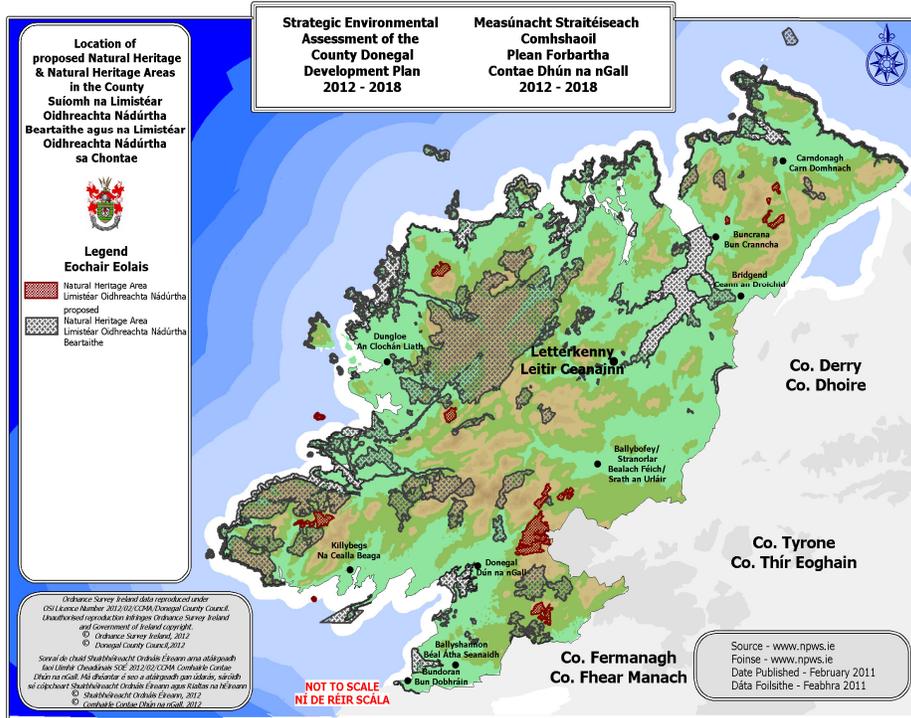
2.4 IDENTIFICATION AND EVALUATION OF ALTERNATIVES

A range of potential alternative scenarios for the types of planning strategies adopted for the Development Plan were identified in the SEA process and evaluated for their likely significant environmental effects (see Section 4). The environmental sensitivities and overlay mapping shown on Maps 2-10 (below) were used in order to predict and evaluate the environmental effects of implementing the scenarios. Communication of the findings of this evaluation helped the Plan-making team to make an informed choice as to which alternative was to be put before the Elected Members as the proposed Plan. Mitigation measures which arose from the evaluation and which were integrated into the Plan are detailed under Section 2.6 of this report.

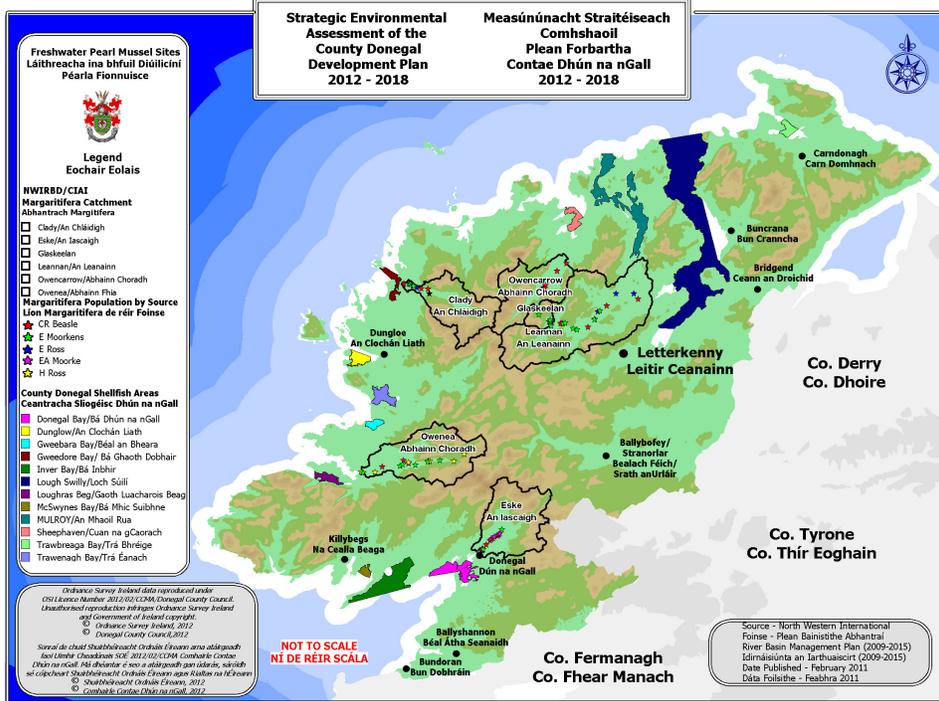
Map 2: Natura 2000 sites (SACs and SPAs)



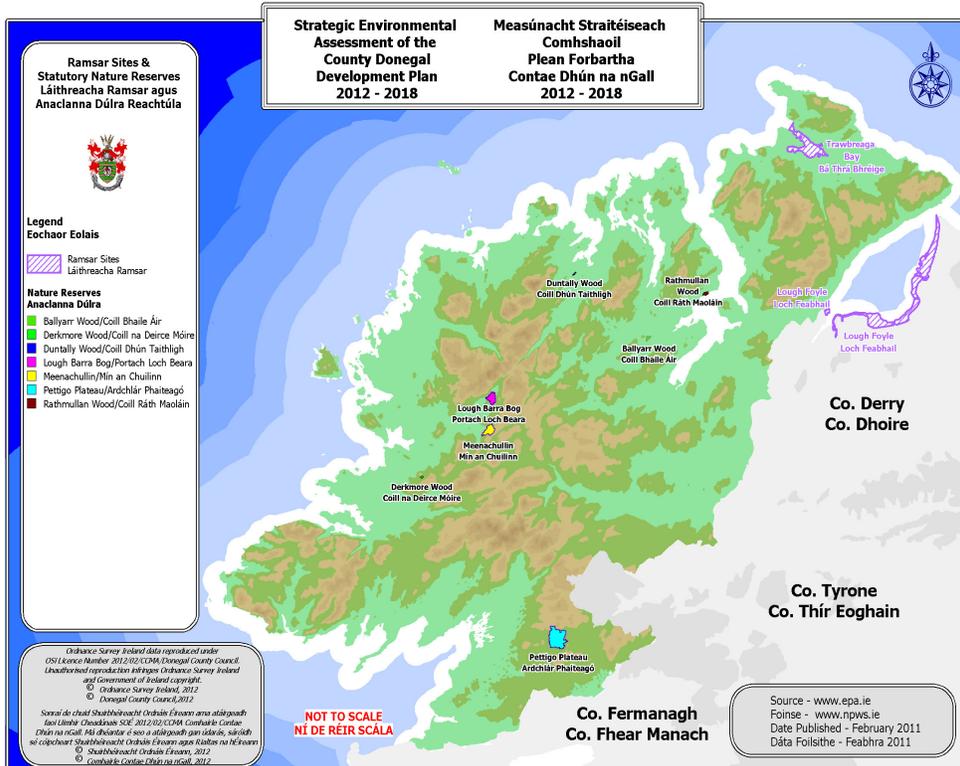
Map 3: Location of proposed Natural Heritage Areas and Natural Heritage Areas



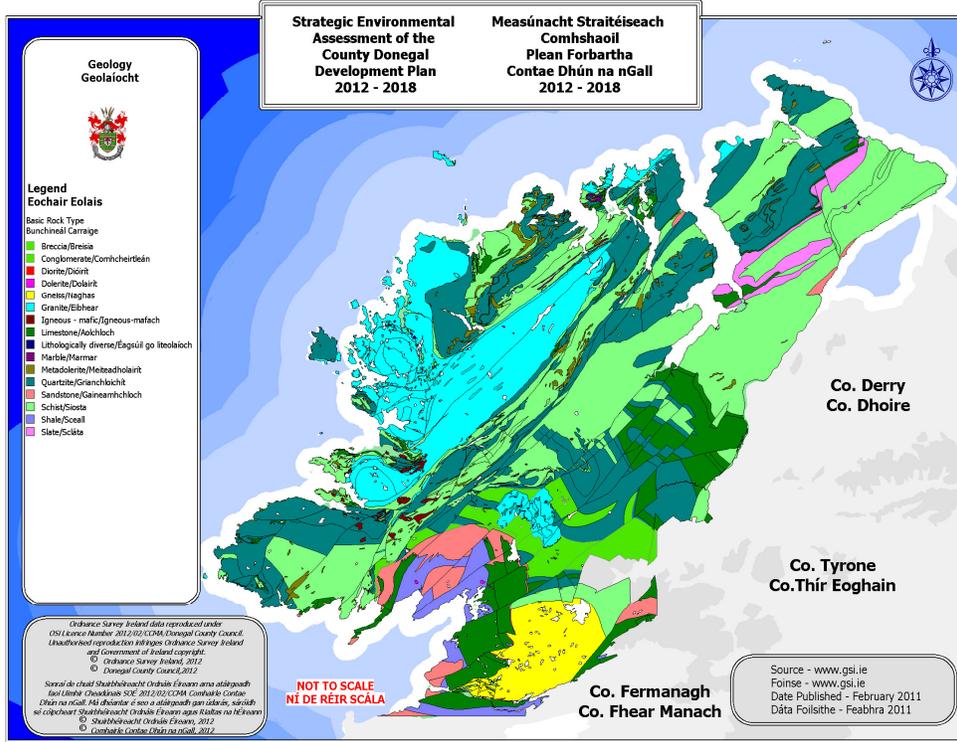
Map 4: Illustrating Freshwater Pearl Mussel catchments and sites and Designated Shellfish Waters



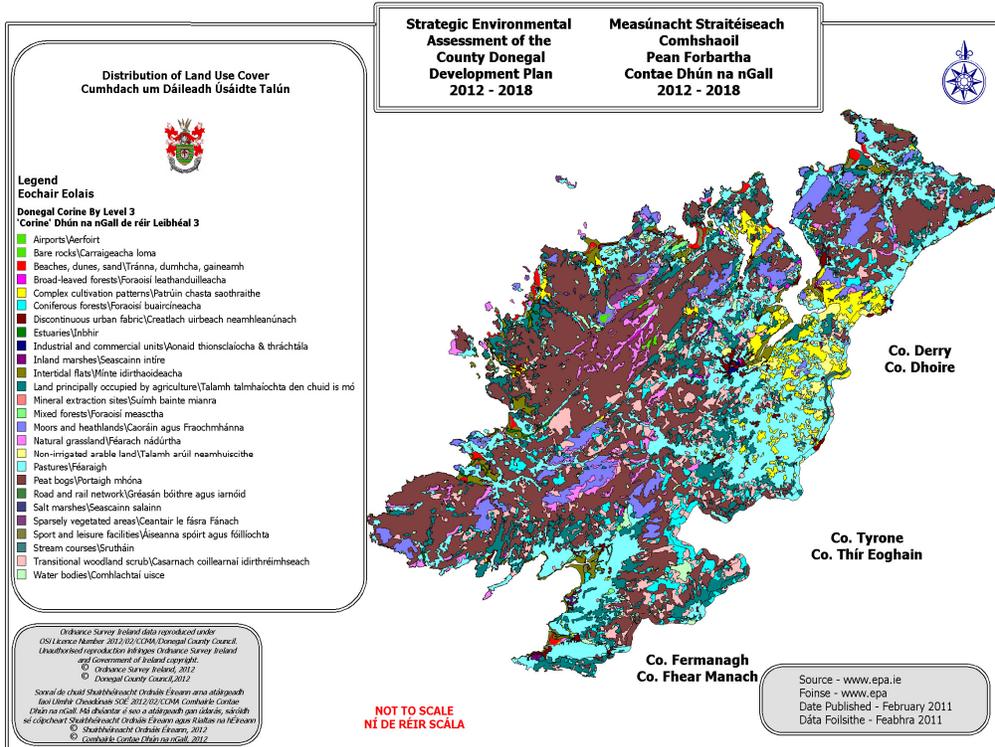
Map 5: Ramsar Sites and Statutory Nature Reserves



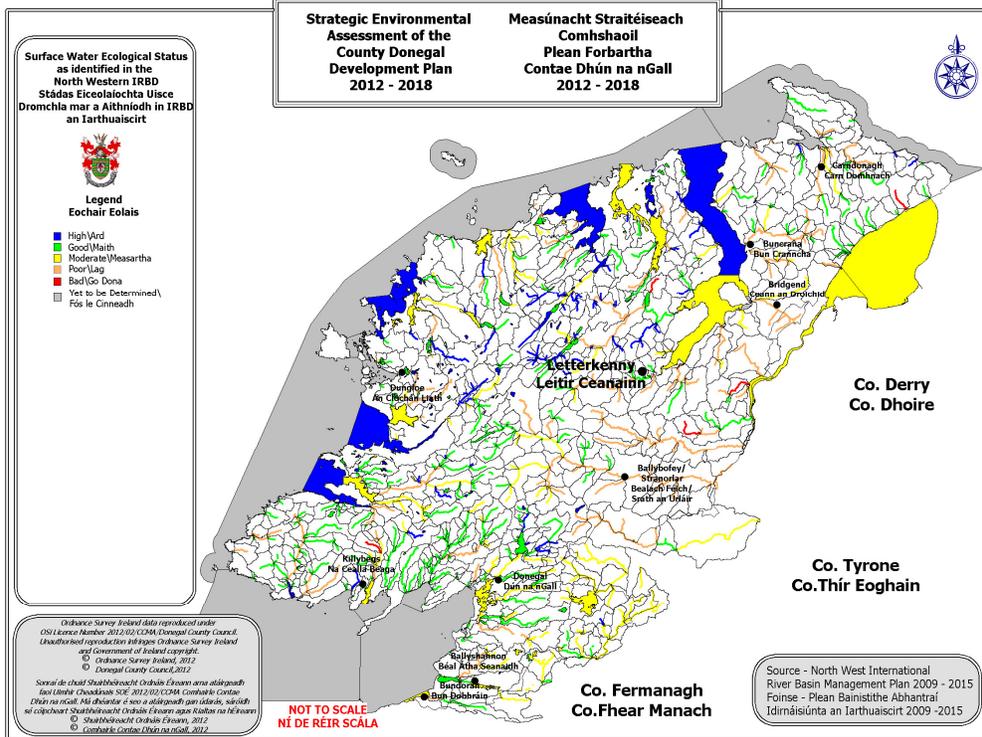
Map 6: Geology of the County



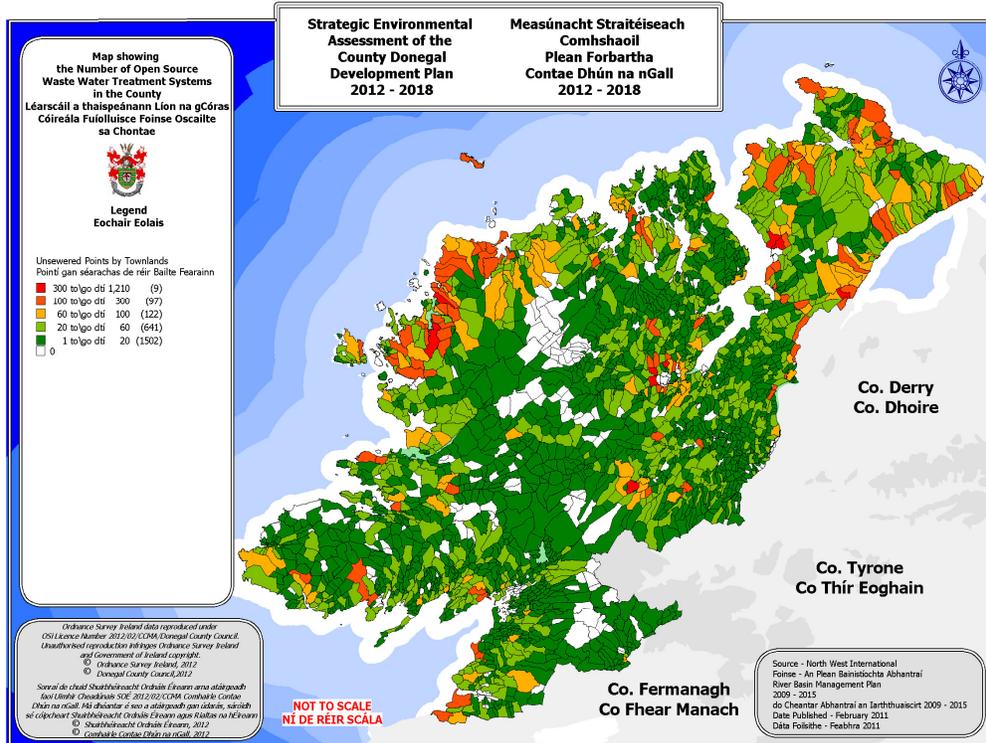
Map 7: Distribution of land cover within the County



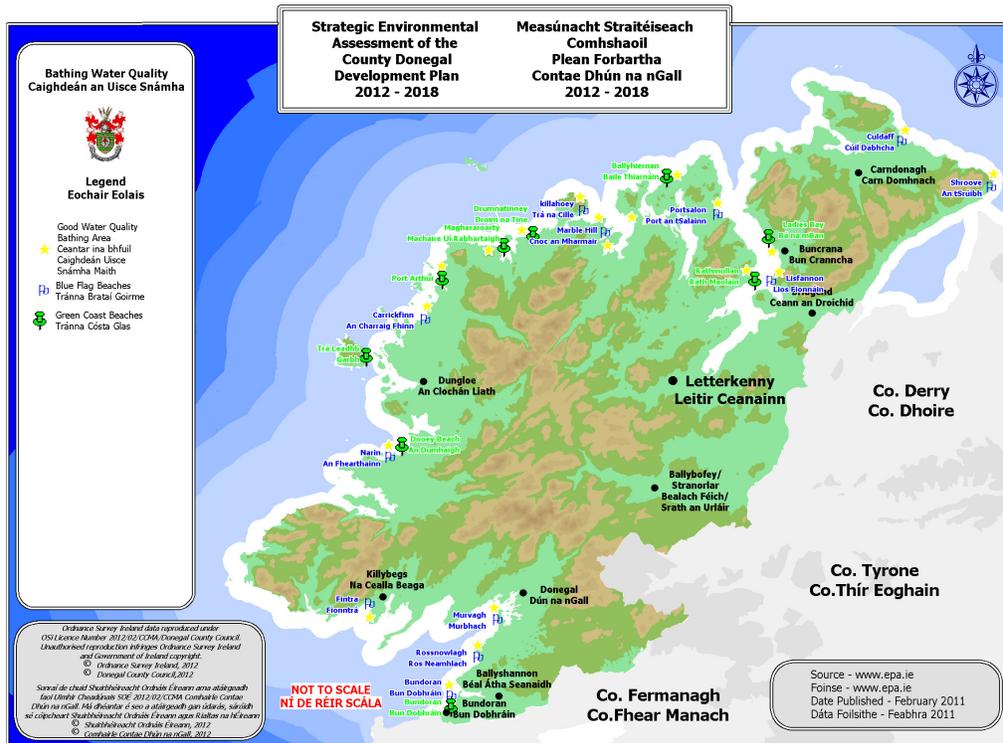
Map 8: Surface Water Ecological Status (NWIRBD)



Map 9: Number of unsewered properties in the County



Map 10: Bathing Water Quality in the County



2.5 APPROPRIATE ASSESSMENT AND STRATEGIC FLOOD RISK ASSESSMENT

An Appropriate Assessment (AA) has been undertaken alongside the preparation and adoption of the Plan. The requirement for AA is provided under the EU Habitats Directive (Directive 1992/43/EEC). The requirement for Strategic Flood Risk Assessment (SFRA) is provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (DEHLG, 2009). The Office of Public Works (OPW) are the lead agency for flood risk management and are developing indicative flood maps and Catchment Flood Risk Assessment and Management Mapping (CFRAM – a catchment based study involving an assessment of the risk of flooding in a catchment and the development of a strategy for managing that risk in order to reduce adverse effects on people, property and the environment). These are due by 2013 (with options) by 2015. The flood risk will be assessed in terms of its likely potential impact upon identified 'Receptors', such as, people, property, schools, hospitals, waste water treatment plants.

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

2.6 MITIGATION

2.6.1 INTRODUCTION

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

- avoid effects;
- reduce the magnitude or extent, probability and/or severity of effects;
- repair effects after they have occurred, and;
- compensate for effects, balancing out negative impacts with other positive ones.

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

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

2.6.2 MITIGATION THROUGH CONSIDERATION OF ALTERNATIVES

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

2.6.3 MITIGATION INTEGRATED INTO SETTLEMENT FRAMEWORK PLANS

The Plan includes a number of Settlement Framework Plans. Environmental considerations have been integrated into the land use zoning objectives contained in these Plans at various stages throughout the plan making process, including through the SEA process. Careful consideration in particular has been paid to the protection of Natura 2000 Sites and to flood risk through the SEA, AA and SFRA processes.

2.6.4 MITIGATION BY ADDITION OF POLICIES AND OBJECTIVES

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

The SEA process shaped the drafting of the entire Plan and each aim, policy and objective were fully assessed as outlined in Table 36 of the Environmental Report (See Appendix C to the County Donegal Development Plan 2012-2018). Table 2, below, outlines how the environmental issues raised throughout

the SEA process was addressed in the plan through a suite of objectives, policies or otherwise. It also identifies a number of objectives and policies that had been identified as having potential conflict with the Strategic Environmental Objectives of the plan that necessitated mitigation, which has been incorporated into the plan. As stated earlier, environmental vulnerabilities, issues and constraints were considered, in the first instance, through the plan writing process and formulated with the explicit intention of protecting the environment and avoiding potentially adverse environmental impacts. Thus mitigation measures have been integrated into the drafting of objectives and policies contained within the Plan from the outset and are not accounted for in Table 2.

Table 2: Incorporating Environmental Issues into the Plan

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required
Biodiversity, Flora and Fauna		
Impact of development works	IC-O-6, WES-P-1, WES-P-4, TC-P-4, TC-P-7, F-O-4, F-P-1, F-P-2, F-P-3, F-P-4, F-P-5, F-P-6, F-P-7, F-P-8, F-P-9, F-P-10, F-P-11, RH-O-2, RH-O-6, EX-O-1, EX-O-4, NH-O-1, NH-O-2, NH-O-3, NH-O-4, NH-O-6, NH-P-1, NH-P-2, TOU-O-2, TOU-P-1,	TC-P-4, wording expanded to refer to all sites with environmental designations not just NHA's. TC-P-7 expanded to include reference to NHAs and NWIRBD.
Protection of watercourses and sensitive water bodies	WES-O-1, WES-O-4, WES-O-5, WES-P-1, WES-P-4, WES-P-9, WES-P-10, F-O-2, F-O-4, RH-O-6, EX-O-4, NH-O-1, MCZM-O-3,	
Control of invasive species	WES-P-1, NH-O-1, NH-P-5,	
Protection of Natura 2000 sites including certain sites within counties Sligo and Leitrim and Northern Ireland.	WES-P-1, TC-P-7, F-O-4, EX-O-4, NH-O-1, NH-O-2, NH-O-3, NH-O-4, NH-P-5,	TC-P-4, wording expanded to refer to all sites with environmental designations not just NHA's.
Protection of Annex II species such as Freshwater Pearl Mussel and salmon	WES-O-4, WES-P-1, WES-P-4, WES-P-10, F-O-4, EX-O-1, EX-O-4, NH-O-1, NH-O-2, NH-P-4,	
Ramsar Sites and Statutory Nature Reserves.	WES-P-1, F-O-4, EX-O-1, EX-O-4, NH-O-1, NH-O-3,	
Ecological Networks	WES-P-1, EX-O-1, EX-O-4, NH-O-1, NH-O-2, NH-O-6, NH-P-5, NH-P-7,	

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required
Shellfish waters	WES-O-4, WES-P-1, WES-P-4, WES-P-9, WES-P-10, F-O-1, F-O-4, RH-O-6, EX-O-1, EX-O-4, NH-O-1, NH-O-2, NH-O-4, NH-P-3, MCZM-O-3	
Population and Human Health		
Quality of Life	IC-O-1, IC-O-2, IC-O-7, IC-O-8, CS-O-5, CS-O-9, CS-P-1, CS-P-2, CS-P-4, ED-O-2, ED-O-7, RS-P-3, RS-P-4, RS-P-7, F-O-1, F-O-3, F-P-1, F-P-2, F-P-3, F-P-5, F-P-6, F-P-7, F-P-8, F-P-9, F-P-10, F-P-11, UB-O-6, UB-P-1, UB-P-2, UB-P-4, UB-P-6, UB-P-7, RH-O-2, RH-O-5, RH-P-1, RH-P-2, TA-O-1, TA-P-1, MCZM-P-10, MCZM-P-11,	
Population trends, distribution of RPG Population targets and Settlement Frameworks.	CS-O-1, CS-O-2, CS-O-3, CS-O-7, CS-O-8	
Health and its relationship to environmental issues.	IC-O-6, WES-O-1, WES-P-3, WES-P-4, WES-P-10, F-O-2, NH-O-1, TOU-O-2, CCG-P-4	
Provision of infrastructure and community facilities	CS-O-1, CS-O-2, CS-O-3, CS-O-6, CS-P-1, CS-P-2, CS-P-3, CS-P-4, RS-O-4, RS-O-6, T-P-1, T-P-4, T-P-5, T-P-7, T-P-26, T-P-27, T-P-28, T-P-29, T-P-30, T-P-31, T-P-32, T-P-34, T-P-36, T-P-38, T-P-40, T-P-41, WES-P-5, UB-O-3, UB-P-1, UB-P-2, UB-P-4, UB-P-6, RH-O-4, TOU-O-5, TOU-O-7, CCG-O-1, CCG-P-1, CCG-P-2, CCG-P-5, CCG-P-7, CCG-P-8, CCG-P-11, CCG-P-13, CCG-P-15, CCG-P-16, CCG-P-21, CH-O-1, CH-P-2, CH-P-4, CH-O-5	

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required
Flooding	RS-P-7, F-O-1, F-O-2, F-O-3, F-O-4, F-P-1, F-P-2, F-P-3, F-P-4, F-P-5, F-P-6, F-P-7, F-P-8, F-P-9, F-P-10, F-P-11	
Water		
Impact of development works on water quality	WES-P-1, WES-P-3, WES-P-4, WES-P-6, WES-P-7, WES-P-8, WES-P-9, WES-P-10, F-P-2, MCZM-O-3	TC-P-7, expanded to include reference to NHAs and NWIRBD.
Alignment with objectives and policies of the NWIRBD Plan.	IC-O-6, WES-O-1, WES-O-4, WES-O-5, WES-P-1, WES-P-3, WES-P-9, WES-P-10, F-O-4, EX-O-4, NH-O-1, MCZM-O-3	TC-P-4, wording expanded to refer to all sites with environmental designations not just NHA's
Wastewater, drinking water and bathing water quality.	IC-O-6, WES-O-1, WES-O-5, WES-P-1, WES-P-3, WES-P-4, WES-P-5, WES-P-8, WES-P-9, WES-P-10, RH-P-8, EX-O-4, NH-O-1, MCZM-O-3, MCZM-P-10	
Air and Climate Change		
Climate Change and Air Quality	IC-O-6, WES-O-5, WES-P-1, E-O-1, E-O-2, E-O-3, E-P-2, E-P-5, MCZM-O-1	
Limiting Greenhouse gas emissions and reducing dependency on fossil fuels.	WES-O-5, WES-P-1, E-O-4, MCZM-O-1, CH-O-4	
Cultural Heritage		
Impact of development works (e.g. infrastructural works, forestry)	T-P-12	
Identification and protection of geological sites,	EX-O-1	
Protection of architectural and archaeological	CS-O-11, EX-O-1, EX-P-4, G-P-1, BH-O-1, BH-O-2, BH-O-3, BH-O-4, BH-P-1, BH-P-2, BH-P-3, BH-P-4,	

Environmental Issue	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Required
structures and sites.	BH-P-5, BH-P-6, BH-P-7, BH-P-8, AH-O-1, AH-P-1, AH-P-2, AH-P-3	
Landscape		
Impact of development works (e.g. infrastructural works, forestry)	CS-P-1, CS-P-2, CS-P-3, RS-O-8, RS-P-5, T-P-10, T-P-12, TC-P-4, TC-P-7, F-O-4, F-P-1, F-P-2, F-P-3, F-P-4, F-P-5, F-P-6, F-P-7, F-P-8, F-P-9, F-P-10, F-P-11, UB-P-1, UB-P-2, UB-P-4, UB-P-6, EX-O-2, EX-P-5, NH-O-5, NH-P-8, NH-P-9, NH-P-11, NH-P-12, BH-P-9, TOU-O-8, TOU-P-1	
Identification, Classification and protection of landscape	IC-O-6, TC-P-4, EX-O-2, NH-P-10, NH-P-13, NH-P-14, TOU-P-3, TOU-P-4	
Other Issues		
Rural Housing	F-O-4, F-P-8, RH-O-2, RH-O-4, RH-O-5, RH-O-6, RH-P-1, RH-P-2, RH-P-6	
Development of recreation and tourism facilities	ED-O-8, TOU-O-1, TOU-O-2, TOU-O-3, TOU-O-4, TOU-O-5, TOU-O-6, TOU-O-7, TOU-O-8, TOU-P-1, TOU-P-2, TOU-P-3, TOU-P-4, TOU-P-5, TOU-P-6, TOU-P-7, TOU-P-8, TOU-P-9, TOU-P-10, TOU-P-11	
Coastal Management	WES-P-9, F-O-4, NH-O-1, NH-P-6, MCZM-O-3, MCZM-P-10	
Waste management	WES-O-2, WES-O-3, WES-P-2,	
Soils	IC-O-6, CS-P-1, CS-P-2, CS-P-3, CS-P-4, WES-O-5, WES-P-10, F-O-1, F-O-3, F-O-4, F-P-1, F-P-2, F-P-3, F-P-4, F-P-5, F-P-6, F-P-7, F-P-8, F-P-9, F-P-10, F-P-11, NH-O-1	
Employment and Enterprise Developments	ED-O-2, ED-O-3, ED-O-4, ED-O-6	

2.6.5 RE-WORDING OF PLAN PROVISIONS

This section shows examples of how the wording of certain Plan provisions has been influenced by the SEA process. The text in **blue** depicts new text added to the original policy/objective and ~~strikethrough~~ indicates text that has been omitted. The plan provisions that were reworded are as follows:

Economic Development Objective

ED-O-10: To maximise the potential of the county's renewable energy resources and to support and facilitate the creation of a sustainable local renewable energy market place in Donegal from where local wind and marine energy operators can transport, store, trade and export their "local renewable energy product" to domestic and non-domestic market **subject to environmental designations and amenity considerations.**

Telecommunications Policies

TC-P-4: It is the policy of the Council to consider proposals for replacement or new telecommunications antennae within designated built heritage areas, designated habitats or areas of especially high scenic amenity where any proposed new antennae can be sited and located in a manner that does not negatively impact on the visual amenities or qualifying interest of any such area. Any proposal for replacement antennae shall be ~~supported by an assessment of visual impact~~ **subject to all material considerations, including environmental designations and amenity considerations.**

TC-P-5: It is the policy of the Council to consider proposals to replace telecommunications support structures within designated built heritage areas, designated habitats or areas of especially high scenic amenity where any proposed new support structure can be sited and located in a manner that does not negatively impact on the visual amenities or qualifying interest of any such area. Any proposal for replacement antennae shall be ~~supported by an assessment of visual impact~~ **subject to all material considerations, including environmental designations and amenity considerations.**

Rural Housing Policies

RH-P-8: In rural areas, a single holiday home will be considered (subject to all other planning constraints) and in doing so, the Council will seek to ensure a balance between the number of holiday homes and the number of permanent homes. In implementing a balance between holiday/permanent homes, the proposed holiday home shall not be permitted if it would result in the total number of existing and permitted holiday homes to represent more than 20% of the total existing and permitted housing stock within the townland that the proposed site is situated within. In the case of townlands that adjoin a specific settlement framework boundary, the 20% balance shall apply to the totality of the townland area that is considered to be outside the settlement boundary.

Holiday Homes shall not be permitted in rural areas that are identified as 'areas under strong urban influence', nor areas designated as 'Especially High Scenic Amenity (EHSA).

In considering the acceptability of a proposal the Council will be guided by the following considerations:-

- **A proposed dwelling shall avoid the creation or expansion of a suburban pattern of development in the rural area;**
- **A proposed dwelling shall not create or add to ribbon development;**
- **A proposed dwelling shall not result in a development which by its positioning, siting or location would be detrimental to the amenity of the area or of other rural dwellers or would constitute haphazard development;**

- A proposed dwelling will be unacceptable where it is prominent in the landscape;
- A proposed dwelling will be unacceptable where it fails to blend with the landform, existing trees or vegetation, buildings, slopes or other natural features which can help its integration. Proposals for development involving extensive or significant excavation or infilling will not normally be favourably considered nor will proposals that result in the removal of trees or wooded areas beyond that necessary to accommodate the development.

The Donegal countryside is a unique resource. It is a recreational resource and a considerable tourist asset. It contains landscapes of considerable quality and amenity, is significant in terms of nature conservation and biodiversity by providing habitats for wildlife, flora and fauna; and incorporates indications of our cultural heritage. It is vital that in accommodating new development, care is taken to ensure that it integrates successfully and does not result in detriment to the character of the rural area, potentially devaluing or destroying the valuable resource which the landscape represents.

Landscapes vary, and this needs to be taken into account. The determination of whether a new building integrates into the landscape is not a test of invisibility; rather it requires an assessment of the extent to which the development of the proposed site, including necessary site works, will blend in unobtrusively with its immediate and wider surroundings.

The assessment of integration will be judged from critical views as seen along stretches of the public road network; public rights of way or other areas of general public access and assembly, e.g. a car park, beach or park. Where a site cannot be readily identified from such critical viewpoints, it does not obviate the need for careful site selection to ensure the proposed building blends into its immediate surroundings and is of a high standard of design.

New buildings should be sited to take advantage of the opportunities afforded by any existing mature planting, hills, slopes or other natural features to assist with integration. Proposed housing that would read as skyline development or occupy a top of slope/ridge location or otherwise be a prominent feature in the landscape will be unacceptable. Similarly a new dwelling that relies on significant earth works, such as cutting into slopes, filling to create a level "platform" for development or mounding to achieve integration, will all be unacceptable.

Due to the widespread views generally available in flat landscapes or exposed hill areas it is all the more important to ensure that new dwellings integrate well with their surroundings. In such areas, poor siting and design carries with it a greater potential for adverse impact on visual amenity and rural character. Particular care is therefore required in site selection so that new houses will integrate into these landscapes.

On occasions it may not be the impact of the new dwelling by itself which affects the rural character, rather it is when assessed cumulatively with other existing and approved buildings in the vicinity and their ancillary features, that it could be detrimental to the rural character of that area. This may be by creating or extending a suburban pattern of development or creating or extending unacceptable ribbon development.

In assessing the cumulative impact of a building on rural character the matters taken into consideration include the following:

- The inter-visibility of the proposed building with existing and approved development;

- **The siting, scale and design of the proposed development; and**
- **the vulnerability of the landscape and its capacity to absorb further development for those who need to live in the rural area.**

RH-P-10: ~~The following exceptions to the restriction on holiday homes will be facilitated~~ **It is a policy of the Council that holiday home development will be considered without the application of a restriction in terms of the balance between holiday homes and permanent homes (Policies RH-P-8 and RH-P-9 refers), subject to environmental and heritage designations and amenity considerations and:**

- (1) Where policy referring to 'resource related tourism projects' can be demonstrated by the applicant. This policy may be demonstrated within settlement frameworks in or in the wider rural area, **or**
- (2) Where the applicant can demonstrate that the site is a brownfield site within the urban fabric of a settlement framework and its development for holiday home purposes is of a size and scale that would not be detrimental to the character of the settlement. A brownfield site is one that has been previously built upon. It excludes parks, recreation grounds, private or public open space, allotments, forestry lands/buildings agricultural lands/buildings and land where the remains of the previous use have blended into the landscape, or have been overtaken by landuse zonings or lands of conservation value or amenity use; **or**
- (3) Where the proposal is for rental purposes only, (maximum 5 units) that is part of a farm diversification plan. This policy may be demonstrated in settlement frameworks or in the wider rural area (excluding EHSA's); **or**
- (4) Where the proposal is for refurbishment of a rundown/dilapidated dwelling or building.

SECTION 3: ENVIRONMENTAL REPORT AND SUBMISSIONS/ OBSERVATIONS

3.1 INTRODUCTION

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

3.2 SEA SCOPING SUBMISSIONS

As referenced under Section 2.2, a pre-scoping report was prepared and circulated to the following 3 statutory bodies and cross-directorate within the Council:

- Environmental Protection Agency (EPA)
- Department of Environment, Heritage and Local Government (DEHLG)
- Department of Communications, Energy and Natural Resources (DCENR)
- Cross-directorate within the Council

Submissions were received from the 3 statutory consultees in response to the pre-scoping paper and were taken into account in the formulation of the scope of the SEA. A summary of the key points raised are as follows:

Environmental Protection Agency (EPA)

- the current state of the environment should be described using most recent and up-to-date environmental data, information and reports and that the current state of the environment should be updated throughout the process as and when new information becomes available.
- the current state of drinking water quality and treatment infrastructure should be described using the most recent and up to date data, information and reports.
- GIS should be used to assist in determining the cumulative vulnerability of various environmental resources and how the plan might impact on these resources.

Department of Environment, Heritage and Local Government (Development Applications Unit).

- The Department support the approach taken in the scoping report and they recommend that Donegal County Council recognize designated, candidate and proposed SAC, SPA and NHA sites.
- Interactions between birds, marine mammals and habitats have not been sufficiently documented off the coast of Donegal, this may therefore be a significant data gap.
- Clear Environmental Protection Objectives should be outlined in the plan with measures to prevent or reduce any significant adverse effects on the environment.

Department of Environment, Heritage and Local Government (Architectural Heritage)

- This is an opportunity for consolidating the built form of urban and rural areas in the new plan to reinforce a sense of place and identity within the County.
- New development should enhance the local environment and contribute to a place of distinction, and therefore there is a need to develop an architectural framework in the development plan incorporating the built heritage. The plan should take into account the potential effect on architectural heritage and identify the implication of the scale, type and location of significant development in the vicinity of structures of architectural heritage merit.
- An opportunity should be taken to identify any areas of special character in the plan area, particularly of differing character within the County.

Department of Communications, Energy and Natural Resources (DCENR - Co-ordination unit)

DCENR had no comments to make on the review.

Donegal National Roads Design Office

- It would be useful if the most urgent infrastructure deficits were clearly identified in the plan, and have some text noting how the policies and objectives of the plan interact.
- Lists the main roads projects for the forthcoming 10 years.

3.3 SUBMISSIONS AND OBSERVATIONS

The Border Regional Authority, Geological Survey of Ireland, Environmental Protection Agency, and the Department of Arts, Heritage & the Gaeltacht made submissions on the Draft Development Plan and Environmental Report during the public consultation period. The information contained in the submissions was taken into account in the SEA and the Appropriate Assessment, which was undertaken for the Plan. The submissions resulted in the following updates being made to the Environmental Report that accompanied the Draft Plan:

- (i) **New text inserted under sub-heading 'Alternative Approaches to the Plan' immediately below the paragraph on Appropriate Assessment and before paragraph entitled 'Current state of the Environment on page 2, section 1.1, Non-technical Summary, of the Environmental Report. New text as follows:**

Alternative Approached to the Plan.

The SEA Directive requires the consideration of SEA Alternatives. Section 4.0 of this Environmental Report entitled 'Alternative approaches to the Plan' considers this and sets out and examines the following 3 alternative growth models derived from the framework for population growth as set out by the Border Regional Planning Guidelines 2010:

Alternative 1: Continuation of trends.

This approach would involve the continuation of the existing pattern of market led development with minimal intervention in relation to strategic planning policy. This would result in continued sporadic growth in a dispersed and uncoordinated manner that would weaken the capacity of towns to support economic growth and viability and development would not be directed to locations with appropriate servicing and infrastructure. This

approach is not considered acceptable nor would it be consistent with the Border Regional Guidelines.

Alternative 2: Urban Centric Model.

This approach would result in the absolute concentration of new development in the Gateway (Letterkenny) and the key supporting settlements of Ballybofey-Stranorlar, Buncrana, Donegal Town, Ballyshannon, Dungloe and Carndonagh. Investment in infrastructure would therefore be concentrated in these core settlements and population would only occur outside these areas through the uptake of previous planning permissions or vacant units. This would strengthen Letterkenny and the key towns but would also put pressure on existing services and facilities in the towns whilst the remainder of towns and villages in the County would stagnate as would the vitality of the rural community. This approach is not considered acceptable as it would not result in coordinated balanced growth of the county nor would it be consistent with the Border Regional Planning Guidelines.

Alternative 3: Balanced Development Model.

This approach would have a Gateway focus (Letterkenny) followed by the key supporting settlements of Ballybofey-Stranorlar, Buncrana, Donegal Town, Ballyshannon, Dungloe and Carndonagh, and the towns of Bridgend and Killybegs that demonstrate strategic economic opportunities. A proposed 50% population growth share would be allocated to these towns (excluding Letterkenny) and be inextricably linked to the capacity of physical infrastructure. Resultantly 50% of growth would be directed to the remainder of the towns and villages and to the rural area. All growth would be linked to the capacity of any location to accommodate new development in the context of infrastructure, environmental sensitivities or landscape sensitivities as examples. This approach is considered acceptable and compatible with the strategy as set out in the Border Regional Planning Guidelines 2010.

In summary Alternative 3, the balanced development model, is considered the most appropriate strategic alternative for the growth of the County having regard to the principles of sustainable development and to the Core Strategy of the Border Regional Planning Guidelines. Growth will be managed so as to co-ordinate programmes for investment to result in optimum investment, ensure accommodation of significant growth with appropriate and adequate servicing and have no resultant negative impacts on the environment. This approach recognises the interdependency of urban and rural areas in the County whilst supporting the capacity of the larger centres to advance the overall development of the County and the region.”

(ii) Text inserted into Environmental Report and referenced as 1.3, so as to state:

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 County Development Plan. It is the view of the Council that formal transboundary consultation is not required, as the implementation of the draft Plan will not have significant impacts on the environment of a member state. In accordance with the provisions of the Planning & Development Acts 2000-2011, The Minister of the Environment, Community and Local Government has been notified of the Council's view.

- (iii) Environmental Report amended by insertion of an additional row into Table 2, under 'local' heading so as to insert the "Lough's Agency Licensing Programme" into the 2nd column.
- (iv) Environmental Report amended by insertion of the following table into section 3.0 of the Environmental Report:

Table 8: Mitigation Arising from Appropriate Assessment

Chapter	Objective, policy or reference in the Plan	Additional policy, objective or reference added to the County Development Plan
Telecommunications	TC-P-4, TC-P-6	<p>TC-P-5 wording should be expanded to refer all sites with environmental designations not just NHA's.</p> <p>TC-P-7 wording was expanded to ensure that roads associated with telecommunications development 'comply with Article 6 of the Habitats Directive and have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of Natura 2000 sites.'</p>
Flooding	F-O-1 F-P-11	<p>F-O-1 wording was expanded to 'comply with Article 6 of the Habitats Directive and have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of Natura 2000 sites.'</p> <p>F-P-11 wording was expanded to state 'subject to environmental considerations and compliance with Article 6 of the Habitats Directive.'</p>
Natural Resources and Development	EX-P-1, EX-P-3, EX-P-5	<p>EX-P-1 wording was expanded to 'comply with Article 6 of the Habitats Directive'.</p> <p>Further paragraph was added 'All extractive industry proposals in designated freshwater Pearl Mussel Catchments will be subject to a Habitats Directive Assessment and will comply with the objectives and practices set out in the relevant Freshwater Pearl Mussel Sub-basin Plan, and any relevant codes of practice.'</p>

Chapter	Objective, policy or reference in the Plan	Additional policy, objective or reference added to the County Development Plan
		<p>EX-P-3 wording was expanded in that any restoration plan must 'comply with Article 6 of the Habitats Directive and have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of a Natura 2000 site.'</p> <p>EX-P-5 wording was expanded to state 'where mitigating works are required to upgrade or realign roads infrastructure, they must comply with Article 6 of the Habitats Directive and have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of a Natura 2000 site, and will comply with the objectives and practices set in any relevant Freshwater Pearl Mussel Sub-basin Plan, and any relevant codes of practice.'</p>
Built and Natural Heritage	<p>Background text added to explain appropriate assessment.</p> <p>New policy Objectives added NH-O-2 NH-O-3 NH-O-4</p> <p>New Policies added NH-P-2 NH-P-3 NH-P-4</p>	<p>Paragraph added to give clarification of when an appropriate assessment is required 'Article 6 of the Habitats Directive (92/43/EEC) requires the protection of the designated species and habitats of Natura 2000 sites. Therefore any plan or project with the potential to impact on the conservation objectives of designated sites is required to take appropriate steps to avoid the deterioration of natural habitats and the habitats species as well as significant disturbance of species for which areas have been designated and maybe subject to Appropriate Assessment.'</p> <p>NH-O-1 To comply with Article 6 of the Habitats Directive (92/43/EEC) and have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of Natura 2000 sites.'</p> <p>NH-O-3 To maintain the conservation value of all</p>

Chapter	Objective, policy or reference in the Plan	Additional policy, objective or reference added to the County Development Plan
		<p>existing and/or proposed SAC's, SPA's and NHA's and Ramsar sites including those plant and animal species that have been identified for protection.</p> <p>NH-O-4 To protect and improve the integrity and quality of Designated Shellfish Waters, and Freshwater Pearl Mussel Basins and to take account of any relevant Shellfish Reduction Program or Freshwater Pearl Mussel Sub-basin Plan.</p> <p>NH-P-2 It is a policy of the Council to ensure the protection of Natura 2000 sites in accordance with EU Habitats Directive (92/43/EEC) and have regard to the relevant conservation objectives, qualifying interests and threats to the integrity of these Natura 2000 sites.</p> <p>NH-P-3 It is a policy of the Council to require the consideration of designated Shellfish Waters and their shellfish pollution Reduction Programmes in all development proposals that fall within their catchment.</p> <p>NH-P-4 It is a policy of the Council to require the consideration of Freshwater Pearl Mussel and any relevant Freshwater Pearl Mussel sub-basin Plans in all development proposals that fall within their basin of catchment.</p>
Economic Development	ED-P-13	Wording to be added to ED-P-13 'The provisions of policy ED-P-15 will also be taken into account, and ED-P-15 (h) will apply'
Building a House in Rural Donegal. A Location Siting and Design Guide		Words need to be added 'Gorse (Ulex europaeus) should not be planted too close to buildings to avoid a fire hazard.

Chapter	Objective, policy or reference in the Plan	Additional policy, objective or reference added to the County Development Plan
Transportation	T-O-1	Policy or text to inform when an EIS may be required to be carried out as part of a project
Chapter 10 Technical Standards	Section 10.15	Add in Note in page 127 'The routes and Corridors are indicative only due to the fact that they are premature and have not been finalised. The necessary SEA and AA for the routes and corridors will be dealt with at project level in due course.'

- (v) **A new section inserted immediately after section 3.0, in Environmental Report and entitled: "4.0 Alternative Approaches to the Plan." Also remainder of sections to be renumbered. The new Section 4.0 to read as follows:-**

Alternative approaches to the Plan

The Border Regional Planning Guidelines, published in 2010 set the framework for population growth in the County up to 2016. The resultant Housing Land Requirements established by the RPG's are set out at page 5 of the core document, table 1. These set the wider development context for the County.

Working within these 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.

Planning context:

The planning context for the alternatives is as follows:

National Spatial Strategy 2002: 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: 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.

Alternatives:

The following are the three alternatives considered:

1. Continuation of current trends.

2. Urban- centric model.
3. Balanced development model.

Details of the Alternative Models:

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

Alternative 1: Continuation of current trends.

This approach would involve the continuation of existing patterns of development and minimal intervention in relation to strategic planning policy. 'Demand' rather than 'need' together with market forces would drive development patterns. The predominant development patterns would involve continued growth of individual rural housing units in the rural area, depopulation of town cores and high growth on the edges of towns, and growth in multiple residential developments in a dispersed and uncoordinated nature.

This development pattern would weaken the capacity of towns to support economic growth and viability. Development would not be directed to locations with appropriate servicing, both in the context of physical infrastructure such as adequate wastewater treatment and also in relation to 'soft' infrastructure such as community facilities, health services. It would increase impacts and encroachment on the natural environment.

This approach would be most likely to have the following impacts:

- Weakened towns and villages and lack of regeneration and revitalisation.
- Pressure of limited resources to make required investments in wastewater and water infrastructure.
- Demand for the uneconomic extension of community services and facilities.
- Pressure on rural areas immediately outside urban areas.
- Further proliferation of individual wastewater treatment systems.
- Provision of higher cost services and facilities in an unplanned way- developer driven and occurring as the need arises.
- Contradictions in identifying investment priorities and delivery of key infrastructural projects.
- Lack of clarity for economic and employment investors in terms of preferred locations for new economic development, and provision of the factors of competitiveness.
- Increase risk of non- compliance with the Water Framework Directive, with damage to environmentally sensitive areas.

Having regard to the foregoing, it is considered that this approach would not be acceptable and would not be consistent with the Border Regional Planning Guidelines.

Alternative 2: Urban- centric model.

This approach would result in absolute concentration of new development to the Gateway (Letterkenny) and to the key population settlements that provide a supporting role to the Gateway; namely Ballybofey- Stranorlar, Buncrana, Donegal Town, Ballyshannon, Dungloe and Carndonagh. It would exhaust redevelopment of brownfield sites and infill sites and revitalisation of the town centres before development would occur on Greenfield sites. Development in rural areas would occur only in exceptional circumstances and therefore population would not increase in the rural areas over the lifetime of the plan except where previous planning permission are implemented or through uptake of vacant units.

Investment in infrastructure, both hard and soft would be concentrated in Letterkenny and the 6 key supporting towns.

This approach would strengthen Letterkenny and the key towns but would place significant immediate pressure on existing services and facilities within these towns. It would stagnate the remainder of the towns and villages in the County and would also stagnate the vitality of the rural community.

This approach would be most likely to have the following impacts:

- Drive critical mass in Letterkenny and the 6 key towns.
- Direct new development to brownfield and infill sites thereby ensuring more compact urban areas.
- Reduce the vitality, vibrancy and competitiveness of the remainder of small towns and villages as attractive places for economic investment.
- Drain resources, vitality and viability from the remainder of small towns and villages due to the demands from Letterkenny and key towns.
- Stagnate population growth in rural areas and diminish rural communities.
- Overlook genuine rural need in line with the Guidelines on Sustainable Rural Housing 2005.

Having regard to the foregoing, it is considered that this approach would not be acceptable as it would not result in the coordinated balanced growth of the County and would not be consistent with the Regional Planning Guidelines.

Alternative 3: Balanced development model.

This approach would have a Gateway focus (Letterkenny) followed by the key population settlements that provide a supporting role to the Gateway; namely Ballybofey- Stranorlar, Buncrana, Donegal Town, Ballyshannon, Dungloe and Carndonagh. The Gateway focus would be to the benefit of the wider county in terms of realising the regionally significant role of Letterkenny, and the assets and investments associated with this role. The directing of population into key towns would also provide for a geographical spread of critical mass to key locations so as to attract sub county level benefits across the county. However, the level of appropriate growth would be set at around 50% of the total overall population growth targets for the County and would be inextricably linked to the capacity of physical infrastructure. This strategic focus would also be extended to a limited number of other smaller sized settlements that demonstrate strategic economic opportunities such as Bridgend and Killybegs. The emphasis of the strategy in this regard is to harness the economic potential at both locations. In tandem with the alignment of key growth to settlements with the infrastructural capacity as exists or planned, this alternative recognises the existing economic, social, cultural and community assets that exist in the remainder of towns and villages and in the rural area. As a result, growth of around 50% of the total population target would be guided to the remaining network of towns and to the rural area. This growth however, would also be linked to the capacity of any location to accommodate new development, whether in relation to wastewater treatment, environmental sensitivities, and landscape sensitivities as examples.

This approach would be most likely to have the following impacts:

- Achieve maximum benefit from investment in physical, social and economic infrastructure.

- Support the establishment of a set of strong settlements becoming the drivers for economic growth in the County.
- Result in environmental benefits as development would be linked inextricably to ensuring the appropriate and adequate provision of hard infrastructure.
- Protect and support rural communities, and rural vitality and vibrancy subject to normal considerations.

Having regard to the foregoing, it is considered that this alternative would be an acceptable option and would be compatible with the strategy set out in the Regional Planning Guidelines 2010.

Assessment and selection of alternatives

Having regard to the principles of sustainable development and to the Core Strategy of the Regional Planning Guidelines, it is considered that alternative 3, the Balanced Development Model is the most appropriate strategic alternative for the County. In undertaking this alternative, growth will be managed so as to coordinate with programmes for investment in infrastructure so as to result in optimum benefit from investment and to ensure that significant growth can be accommodated with appropriate and adequate servicing and no resultant negative impacts on the environment. This approach recognises the strong inter-dependency between urban and rural areas in County Donegal by ensuring that rural communities are supported where genuine rural need and all other normal planning considerations can be satisfied.

The concentration though, on Letterkenny and the other key towns including making the investment necessary for infrastructure available, will support the capacity of the larger centres to advance the overall development of the County and of the region.

The alternatives are further assessed using the set of Strategic Environmental Objectives (SEO's) in the following table.

Table 9: Alternative Approaches to the Plan

Alternative	Probably conflict with status of SEO's- unlikely to be mitigated to an acceptable level.	Potential conflict with the status of SEO's- likely to be mitigated to an acceptable level.	Uncertain interaction with status of SEO's.	Neutral interaction with status of SEO's.	No likely interaction with status of SEO's.	Likely to improve status of SEO's.
Continuation of current trends	POP2, SL3, AC2, MA1, LD1	BIO1, BIO2, BIO4, POP1, SL1, WR1, WR2, CM2, MA2,		AC1,	BIO3, HH1, SL2, SL4, SL5, WR3, WR4, WR5, CM1, CH1,	
Urban-centric		BIO1, BIO2,		SL4, SL5,	BIO3, SL1, SL2,	BIO4, POP1,

Alternative	Probably conflict with status of SEO's- unlikely to be mitigated to an acceptable level.	Potential conflict with the status of SEO's- likely to be mitigated to an acceptable level.	Uncertain interaction with status of SEO's.	Neutral interaction with status of SEO's.	No likely interaction with status of SEO's.	Likely to improve status of SEO's.
model		WR1, WR2, CM2,			WR3, WR5, CM1, CH1	POP2, HH1, SL3, AC2, MA1, MA2, LD1, WR4, AC1
Balanced development model		BIO1, BIO2, WR1, WR2, CM2		BIO4	BIO3, SL1, SL2, SL4, SL5, WR3, WR5, CM1, CH1	POP1, POP2, HH1, SL3, WR4, AC1, AC2, MA1, MA2, LD1

(vi) Additional rows inserted into Table 10 (List of Natura 2000 sites in County Donegal comprising SACs and SPAs) of Environmental Report, so as to include the following references:

- Malin Head SPA 004146
- Fanad Head SPA 004148
- Falcarragh to Meenlaragh SPA 004149

(vii) Environmental Report, Section 5.11 of Environmental Report amended by insertion of the following text after the first paragraph:

County Donegal is one of the most complex geological areas in Ireland. It's key geological features are the Gweebarra fault that continues under the Atlantic and also forms another diagonal rift through the Scottish Highlands and which was formed through granite rock by glacial erosion. Igneous rock is the predominant rock type in Donegal with glass-like quartz, feldspars and black mica evidenced in the Granite. The County also includes large areas of metamorphic rocks including schists and gneisses and Quartzite as evidenced on Errigal.

Geology is recognised as a fundamental component of natural heritage and as such the conservation of geological heritage features is considered an important aspect of conserving the natural heritage. In 1998, the Geological Survey of Ireland established the Irish Geological Heritage (IGH) Programme, which is a partnership between The Geological Survey of Ireland (GSI) and the National Parks and Wildlife Service (NPWS) Under the IGH Programme important sites that are capable of being conserved as Natural Heritage Areas (NHA) are being identified. Those not selected for NHA designation are being promoted as County Geological Sites (CGS). The IGH Programme has identified about 114 sites of interest as CGS (including those to be

designated as geological NHAs)' and for information purposes, the following table sets out the list of IGH's.

(viii) Insert a new table to Environmental Report as follows:

Table 20: List of Irish Geological Heritage Programme Sites

Site Name	Townland(s)/district	Description
Aghlem Bridge	Aghlem, Leghawny	Evaporites on the south east side of Lough Eske.
Ards Point	Creelough	This is the best and most completely exposed section through the Ards Transition Member.
Ardsbeg	Ards Beg/Falcarragh	A ductile thrust fully exposed and easy of access. Stratigraphy belongs to the Appin Group of the Dalradian Supergroup.
Ballycramsey	Drung (Ed Malin), Ballycramsy/Malin Head, Inishowen	Deformed schist which contains beach cobbles, indicating ice limits.
Ballymacstocker and Bay	Croaghross/Portsalon, Fanad Head, Lough Swilly	Non Dalradian clasts of possibly Devonian Age. Also beach and dune system.
Ballyness Bay	Falcarragh, Meenlaragh	Ballyness Bay is an estuarine inlet at Gortahork, at the mouth of Glenna River. It is almost completely drained at low tide, when sandy mudflats are exposed. Fold is also exposed in rocks to the south of the pier.
Ballyshannon	Knader/Ballyshannon	Small quarry with stratigraphical unconformity
Barnes Beg Gap	Barnes Upper	contact zone - granite/Dalradian. Historically important site 1800's. Possible wollastonite mineral
Barnesmore Gap	Friarsbush, Tawnawully Mountains and West side of Belshade Lough	secondary Uranium minerals, lateral moraines and other structures related to igneous intrusions
Bloody Foreland	Knockfola/Altnapeaste, Meenlagha, Bloody Foreland	Bloody Foreland presents numerous geological characteristics: chemical weathering on granite, a gravel beach from the Holocene period (10.000y) and series of moraines and boulders which record successive ice blocks.
Breesy Hill	Carricknahorna / Breesy Hill	Spectacular example of migmatized metabasite of the Sliswood Division
Brockagh (East of Creelough)	Brockagh	Part of the Donegal granite contact zone showing intrusive relationships and a wide variety of rock types incorporated as xenoliths.

Site Name	Townland(s)/district	Description
Bundoran Bay	Magheracar, Drumacrin, Finner/Bundoran	Abundant fossils in the Bundoran Shale formation (4km coastal stretch) and exposure of the top of Ballyshannon Limestone
Burnfoot Spread	Inch Level (Ed Burt, Ed Inch Island, Ed Fahan)/ Burnfoot, Inch Level	A pristine example of a large bay fjord head delta complex sited on the eastern margin of Lough Swilly, covering about 4-5 Km ² .
Carndonagh	Carndonagh/Inishowen	Fan and erosional meltwater channels linked to the ice withdrawal from the Ballycramsey ice limit in Trawbreaga bay. There is also an infiltration gallery on the raised beach north of Carndonagh.
Carrowtrasna	Carrowtrasna (Ed Gartan) (NE of Glenveagh National Park)	1.5m thick band of talc interbanded with mica schist and quartzite of the Loughros Formation/Upper Falcarragh Pelites.
Clogheracullion [U]	W of Kingarow/NE of Gubbin Hill, SW of Lough Muck, Fintown	"Main Radiometric Zone" in the Donegal granite with uraninite in bog.
Clooney	Cashelgolan/Clooney, Portnoo	The site comprises Ardara granite and represents the main outer contact and northern aureole
Corvish	North of Carndonagh	The site illustrates marine muds with glacial advances in between. The site is important as it provided age information
Croaghan Head, Fanad	Croaghan/Milford - Letterkenny	Port Askaig Tillite with sedimentary structures are well demonstrated.
Crohy [talc]	Crohy/Crohy Head (South of Maghery Bay)	The cliff face has shown steatite veins (talc) in Dalradian black schists. It was mined intermittently from late 19th - mid 20th Century.
Doagh Isle	Lagacurry	Argyll Group Dalradian rocks with exceptional preservation of tectonic features in Greenschist facies metamorphic rocks
Donegal Bay	Donegal	Cliffs, drowned drumlins, dunes, salt marshes
Doorin Point to Mountcharles	Raneely, Point, Tullinlagan, Rock, Drumaneary, Salthill Demesne, Hall Demesne/ Doorin Point, Mountcharles	Low cliffs, platforms, erosion features
Dooros Point	Dunfanaghy	Falcarragh Pelite with structures

Site Name	Townland(s)/district	Description
Dunagree Point		Rocky Ridges with pocket beaches of sand resulting from glaciation followed by submergence and the inwashing of sand from the sea floor.
Dunfanaghy	Dunfanaghy	A ductile thrust, fully exposed and very accessible. Sessiagh-Clonmass Formation pelites overlie Ards Quartzite (all Appin Group rocks of the Dalradian supergroup).
Dunlewy	Dunlewy	A granite contact zone occurs with a disused marble quarry. This has well-developed metamorphic minerals and deformational features and would be a good teaching resource site.
Dunmore Breccia Pipe	Portnoo	Appinite and breccia pipe
Edergole	Edergole	A unique site at the north end of Lough Eske presenting an alluvial fan in an extensional basin (Ivorian age: 353.8-349.5Ma)
Errigal Mountain	Gweedore	Physical weathering, mass wasting; fossil rock glaciers and talus foot debris complexes on mountain flanks down to 150m
Fahan Pier	Figary, Inishowen	Excellent teaching outcrop at which structure and deformation can be demonstrated in Fahan slates.
Fairies Bridge	Bundoran	Sea-arches exposed north of Aughrus Point, just north of Bundoran.
Falcarragh Flat		Flat area of coarse grained gravels related to a glacial efflux into standing water.
Fanad		Areal scouring landscapes
Fanad Granite & Fanad Head	Fanad Head	Intrusion breccias and appinite. Also emerged beaches at Fanad Head (Ballyhiernan Bay). Many of the beaches of northwest Ireland are backed by machair, low-lying calcareous sand terrain similar to that of the Hebrides and western Scotland, but this is less common south of Clew Bay (Devoy).
Fintown [U: main radiometric zone]	roadside exposure Clogheracullion to Lough Agarvy	pitchblende vein at Croherle
Five Finger Strand	Culoort	Sand and gravel beach, sand cliffs, parabolic dunes

Site Name	Townland(s)/district	Description
Glenaboghill [Zn, Pb]	[aka Fintown]	Veins in Dalradian calcareous schists, marble and quartzite. Mined in the early 1800s.
Glencrow Delta	Glencrow	Icd pushed delta complex
Glentogher [Pb, Ag, Au]	Inishowen, near Carndonagh	Stratabound mineralisation in quartzite (Galena contains silver, pyrite contains gold). Mined in the 19th Century.
Glinsk, NW Fanad	Carrownageeragh	Contact aureole
Gweedore Moraines		Moraines
Horn Head (Micky's hole)	Dunfanaghy	Site contains the best exposed example of a ductile thrust in the islands of Ireland and Britain – possibly also in Europe as a whole. Stratigraphically the rocks belong to the Appin Group of the Dalradian with (inverted) Ards Pelite over normally disposed Ards Quartzite.
Inishfree Bay		Storm beaches, longshore drift
Inishowen Head		A bold headland on schists and quartzites, rising 136 m above sea level with long coastal slopes descending to rocky cliffs
Inishtrahull		Ireland's oldest rocks (Rhinn's complex)
Inver Dyke/ Parkmore Dyke	Inver	Large xenoliths - windows into the upper mantle of the Earth
Keeldrum [Pb, Ba]	Gortahork	Old mine workings/buildings with two lode zones in Ards quartzite, mined in the 19th Century for Zinc and Lead
Kildoney Point	Kildowey Glebe	Interesting and clearly visible deltaic sedimentary structures in Upper Calp sandstones.
Kilkenny Breccia Pipe	Kilkenny, Gortnasillagh	An intrusive dyke exposed at the surface. Explosion breccia.
Kilrean	Kilrean	Minerals of the Ardara Appanite suite: asbestos; chrysotile.
Kiltyfannad Lough	Lougheraherk	This area represents one of the best exposed sections through the Port Askaig Tillite and forms the reference locality for Donegal, important for stratigraphy.
Kinnoge Bay (Armada Bay)	Kinnagoe	Beach and Dune System

Site Name	Townland(s)/district	Description
Knader Lough		Precambrian metagabbro (c. 580Ma) with well preserved igneous texture
Knockalla		Devonian rocks against Leenan fault: non-Dalradian clasts
Knocknafolla (Bloody Foreland)	Knockfolla/Meenlagha, Bloody Foreland	deep chemical weathering of rotted granite
Lackagh Bridge	On the road between Carrigart and Cresslough	Main Donegal Granite, also Granite/Dalradian contact
Lagh Hill	Culdaff	This site contains excellent examples of conglomerates within the Southern Highland Group. Important information on provenance.
Laghy Quarries	Laghy	Basal Ballyshannon Limestone
Largymore Coastal section	Killybegs	Trace fossils and other fossils (macro and microfauna)
Lough Boyle (formerly Ballykillowen Hill)	Meenacaragh	The site includes the contact zone (Lough Derg Slide) between the Lough Derg Inlier of the Slishwood Division to the South and Dalradian rocks
Lough Columbkille	Cashelard	Minerals: potash feldspar; perthite, actinolite
Lough Eske	Burns Mountain, Friary, Tawnyvorgal	Lower Carboniferous section
Lough Finn		Areally scoured landscape.
Lough Finn Lateral Moraine		Lateral moraines. Scientifically important because it records a late phase of ice sheet decay as the Donegal ice cap decayed.
Lough Greenan	Glen, Termor, Millford	Scheelite/tungsten mineralisation
Lough Keel	Gweedore	fan
Lough Lareen	Doobally	Schist
Lough Nacung, Dunlewy	Gweedore	Paternoster lakes (Dunlewy Lough, Lough Nacung Upper and Lough Nacung Lower)
Lough Swilly		Long wide fjord
Loughros More Bay		estuarine environment
Maghera Strand		inwashed sandflat, sill, quartzites
Malin Bay/Skelpoonagh Bay	Malin Beg, Malin More, Glencolumbkille, Beefan	This area provides exceptional exposures through a fold system within the Dalradian

Site Name	Townland(s)/district	Description
		supergroup.
Malin Flat	North of Malin	The Malin Flat records former higher postglacial sea levels and exhibits isolated fossil sea stacks and intervening swash gullies.
Malin Head	Malin Head, northern coast	Malin Head is a peninsula of quartzite and volcanic rocks that has been strongly glaciated.
Malin Head	Ardmalin	Raised beach deposits, cobbles, high energy wave climates
Melmore Rosguill/Lough	Carrigart	Melmore Migmatite
Mountcharles, Mountcharles Sandstone Mines, Mountcharles Sandstone quarry		Hand pump. Cream coloured dimension stone good for ornamental sculpture. Also Carboniferous Sandstone, with old stone mines and active extraction of stone in quarries.
Moville to Inishowen Head	Moville	The exposures of Southern Highland Group Dalradian rocks on the foreshore at Moville and for 2km to the NE provide exceptional preservation of sedimentary and tectonic features in low grade (Greenschist) metamorphic rocks. Valuable educational resource.
Muckish Mountain	Ballyboe Mountain	Disaggregated quartzite, of the Ards Quartzite Formation, has been quarried for glass sand. Also rock glaciers.
Muckros Head-Fintragh Bay	Largysillagh, Ballymoon	A coastal cliff and intertidal exposure of a wide range of rock types and sedimentary structures typical of many depositional environments are visible.
Mullagh Derg	Mullaghderg	Orbicular granite
Mulroy Bay	Carrowkeel, Millford	Fjord, salt marshes, intertidal mud
Naran Hill		appinite
North margin of Donegal Bay		Drumlin landscapes.
Oughtdarnid		High-pressure metamorphism illustration
Owenator River	Gweedore	boulder beds, fan, glacial mountain erosional inheritance
Poisoned Glen	Gweedore, Dunlewy Far	meanders, glacial mountain erosional inheritance

Site Name	Townland(s)/district	Description
Pollan Bay [Pb, Zn, Ba]		Mineralisation (lead, zinc, barium)
Pollet Great Arch	south of Fanad Head	Sea arch
Pollnalong, Rosguill	Derrycassan - Carrigart	Excellent, perfectly exposed, stratigraphic succession, some 300m thick, through upper part of Sessiagh – Clonmass Formation
Pollnapaste	Kincrum	karst and cave
Quigley's Point	Carrowkeel	alluvial gold
Quigley's Point (Lough Foyle)	Quigley's Point, Carrowkeel	There are several delta-like lobes at stream mouths along the coast, as at Quigley's Point
Rathlin O'Birne Island		arch
River Finn		paleo-terraces
Rosapenna & Rosapenna Peninsula	Rosapenna - Carrigart	Tombolo. The locality is also of crucial importance to Dalradian deformation history.
Rough Point Sill	Dunfanaghy	Metamorphic rock: metadolerite
Shalweg/Shalwy Moraine		Moraines on north margin of Donegal Bay.
Sheep Haven		branched bay formed by glaciation, with quartzite rocky shores and sandy beaches. Also a site for research on actual and potential dune instability.
Sheshkinarone	Burtonport	Quartz-muscovite-beryl greisen zone in Rosses Granite. Outcrop near road damaged by blasting and irresponsible collecting of beryl.
Slieve League	Ballymore / Glencolumbkille	quartzite megacliff, mass wasting and Carboniferous sandstone
Slievetooley		Slievetooley is mountainous cliffy coast (N facing cliff about 200 m), extending to the precipitous cliff of quartzite on Glen Head.
South Donegal	Numerous	Ribbed moraines
St John's Point, St. John's Peninsula, St. John's Point (McSwynes Bay to tip)	Ballysaggart, Dunkineely, Point	The north coast is partly an escarpment cliff. The Point is cut in Lower Carboniferous Limestone and shows weathering features. A large wave moved boulder may be the result of a tsunami. Also Ballyshannon formation, Limestone pavement and Tertiary dyke

Site Name	Townland(s)/district	Description
Stralinchy	Stralinchy	Slieve Tooley Quartzite; Cranford Limestone
The Doon		horseshoe-shaped bay and periglacial landscape features
The Pullauns	Brownhall Demense	shallow developed river cave
The Rosses		Cnoc and Lochan landscape
Tory Island	Ardlarheen, West Town, East Town	Tory Island is granitic, with a quartzite tip at its eastern end. Tors.
Trabane, Malin Beg	Malin Beg	Glaciomarine sediments on NW coast, exposed in a stream cutting leading into the bay.
Trawbreaga Bay		Estuary formed by submergence of a lowland.
Tremone Bay	Culdaff	Port Askaig Tillite

- (ix) **Text in Environmental Report amended at page 50 so as to replace the words (within the 4th Paragraph), 'The Department of the Environment, Heritage and Local Government National Monuments Section' with 'The Department of Arts, Heritage and the Gaeltacht National Monuments Section.'**
- (x) **Text in Environmental Report amended at page 60, 3rd paragraph, from: 'These are due by 2013 (with options) by 2015,' to, 'These are due by 2013 and will be followed by the Catchment Flood Risk Management Plans (CFRMP's) by 2015.'**
- (xi) **Table 33 of the Environmental Report amended by inserting text at the third column (Targets) within the row for Environmental Protection Objective BIO3 so as to state: 'Incorporate the Pollution Reduction Programmes for Shellfish Waters.'**
- (xii) **Table 33 of the Environmental Report amended at the second column (Indicators) within the row for Environmental Protection Objective SL2, by replacing the words, 'gsi.ie' with 'GSI'.**
- (xiii) **Amend Table 33 of the Environmental Report by inserting text at the third column (Targets) within the row for Environmental Protection Objective WR3 so as to state: 'Improve Water Conservation.'**
- (xiv) **Amend Table 33 of the Environmental Report by inserting text at the third column (Targets) within the row for Environmental Protection Objective AC2 so as to state: 'Consider recommendations of OREDP in Off shore wind energy developments.'**
- (xv) **To amend the title of Map 6 within the Environmental Report to read: "Geology of the County"**

3.4 ENVIRONMENTAL REPORT

The Environmental Report and the Draft Plan were placed on public display from the 13th June to 22nd August 2011. A report on the submissions and observations received during that public consultation process was presented to members of Donegal County Council in the Managers Report dated October 2011. It recommended that various measures be integrated into the Plan in order to mitigate environmental effects. That report was considered by members at a special Council Meeting on 16th January 2012 and it was decided to amend the draft. The amendments included "Material Alterations" that were subjected to further SEA to take account of changes being made to the Draft Plan and the findings of that SEA was presented in a further report on the Strategic Environmental Assessment of the proposed Material Alteratons to the Draft County Donegal Development Plan 2012-2018. The proposed Material Alterations and the SEA report was on public display from 2nd March to 30th March 2012 and a report on the submissions and observations made was presented in a Manager's Report to the Members of Donegal County Council. It was resolved by Members to make the County Donegal Development Plan 2012-2018 at an adjourned Council meeting on the 6th June 2012. Upon adoption of the County Donegal Development Plan 2012-2018 both reports were used to update the original Environmental Report into a final Environmental Report, which is available alongside the adopted Plan.

At each stage of the process the Elected Members took into account the findings of the Environmental Report on the Draft Plan and also the report on the Strategic Environmental Assessment of the proposed Material Alteratons to the Draft County Donegal Development Plan 2012-2018.

SECTION 4: ALTERNATIVES AND THE PLAN

4.1 INTRODUCTION

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

4.2 DESCRIPTION OF THE ALTERNATIVE SCENARIOS

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

The following are the three alternatives considered:

- Continuation of current trends.
- Urban- centric model.
- Balanced development model.

4.2.1 Alternative Scenario 1: Continuation of current trends

This approach would involve the continuation of existing patterns of development and minimal intervention in relation to strategic planning policy. 'Demand' rather than 'need' together with market forces would drive development patterns. The predominant development patterns would involve continued growth of individual rural housing units in the rural area, depopulation of town cores and high growth on the edges of towns, and growth in multiple residential developments in a dispersed and uncoordinated nature.

This development pattern would weaken the capacity of towns to support economic growth and viability. Development would not be directed to locations with appropriate servicing, both in the context of physical infrastructure such as adequate wastewater treatment and also in relation to 'soft' infrastructure such as community facilities, health services. It would increase impacts and encroachment on the natural environment.

Having regard to the foregoing, it is considered that this approach would not be acceptable and would not be consistent with the Border Regional Planning Guidelines.

4.2.2 Alternative Scenario 2: Urban- Centric model

This approach would result in absolute concentration of new development to the Gateway (Letterkenny) and to the key population settlements that provide a supporting role to the Gateway; namely Ballybofey- Stranorlar, Buncrana, Donegal Town, Ballyshannon, Dungloe and Carndonagh. It would exhaust redevelopment of brownfield sites and infill sites and revitalisation of the town centres before development would occur on Greenfield sites. Development in rural areas would occur only in exceptional circumstances and therefore population would not increase in the rural areas over the lifetime of the plan except where previous planning permission are implemented or through uptake of vacant units. Investment in infrastructure, both hard and soft would be concentrated in Letterkenny and the 6 key supporting towns.

This approach would strengthen Letterkenny and the key towns but would place significant immediate pressure on existing services and facilities within these towns. It would stagnate the remainder of the towns and villages in the County and would also stagnate the vitality of the rural community.

Having regard to the foregoing, it is considered that this approach would not be acceptable as it would not result in the coordinated balanced growth of the County and would not be consistent with the Regional Planning Guidelines.

4.2.3 Alternative Scenario 3: Balanced development model

This approach would have a Gateway focus (Letterkenny) followed by the key population settlements that provide a supporting role to the Gateway; namely Ballybofey- Stranorlar, Buncrana, Donegal Town, Ballyshannon, Dungloe and Carndonagh. The Gateway focus would be to the benefit of the wider county in terms of realising the regionally significant role of Letterkenny, and the assets and investments associated with this role. The directing of population into key towns would also provide for a geographical spread of critical mass to key locations so as to attract sub county level benefits across the county. However, the level of appropriate growth would be set at around 50% of the total overall population growth targets for the County and would be inextricably linked to the capacity of physical infrastructure. This strategic focus would also be extended to a limited number of other smaller sized settlements that demonstrate strategic economic opportunities such as Bridgend and Killybegs. The emphasis of the strategy in this regard is to harness the economic potential at both locations. In tandem with the alignment of key growth to settlements which have the infrastructural capacity as exists or planned, this alternative recognises the existing economic, social, cultural and community assets that exist in the remainder of towns and villages and in the rural area. As a result, growth of around 50% of the total population target would be guided to the remaining network of towns and to the rural area. This growth however, would also be linked to the capacity of any location to accommodate new development, whether in relation to wastewater treatment, environmental sensitivities, and landscape sensitivities as examples.

4.3 REASONS FOR CHOOSING THE PLAN IN LIGHT OF THE OTHER REASONABLE ALTERNATIVES DEALT WITH.

The Alternatives that were examined were produced and evaluated having regard, inter alia to environmental consequences. The Development Plan which emerged from the Plan preparation process and was adopted is Scenario 3. This scenario achieves a good balance between potential environmental impact and conformance with relevant National and Regional planning objectives. With the integration of appropriate mitigation measures potential adverse environmental effects which could arise as a result of implementing this scenario would be likely to be avoided, reduced or offset. Alternative Scenario 3 was chosen to be developed for the Development Plan by the plan-making team and adopted by the Elected Members having regard to both:

1. The environmental effects which were identified by the Strategic Environmental Assessment; and
2. Planning - including social and economic effects.

SECTION 5: MONITORING MEASURES

5.1 INTRODUCTION

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section and Section 8 of the Environmental Report contain proposals for monitoring the likely significant effects of implementing the County Development Plan. Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action.

In addition to this, monitoring can also play an important role in assessing whether the Plan is achieving its environmental objectives and targets - measures which the Plan can help work towards - whether these need to be re-examined and whether the proposed mitigation measures are being implemented.

5.2 INDICATORS AND TARGETS

Monitoring is based around the indicators which were chosen earlier in the process. These indicators allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives used in the evaluation. Focus will be given to indicators which are relevant to the likely significant environmental effects of implementing the County Development Plan and existing monitoring arrangements will be used in order to monitor the selected indicators. Each indicator to be monitored will be accompanied by the relevant target(s) which were identified with regard to the relevant legislation. Table 33 of the Environmental Report shows the indicators and targets which have been selected with regard to the monitoring of the Plan.

5.3 SOURCES OF MONITORING INFORMATION

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

5.4 REPORTING

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

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

this monitoring shall be that required by the SEA process itself and shall be based on the Environmental Objectives, Indicators and Targets as set out in section 8.1 of the Environmental Report (Table 33) are presented in the table below and the thresholds at which corrective action will be considered are identified under the heading "Targets".

Table 3: Environmental Protection Objectives, Indicators and Targets

Biodiversity, fauna and flora		
Environmental Objectives	Indicators	Targets
BIO1: Ensure compliance with the Habitats Directive by protecting all Natura 2000 sites and habitats of species (SACs and SPAs) within the County.	Number and nature of developments permitted in or within the 15km Buffer of the Natura 200 site.	Maintenance of favourable conservation status of the Qualifying Interests of all Natura 2000 sites. Control of inappropriate development in and within 15km of Natura 2000 sites or likely to impact upon the Quality Interests of Natura 2000 sites.
BIO2: 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 Catchment Plans for Freshwater Pearl Mussel. Compliance with NWIRBD.
BIO3: Protect the marine environment, and promote integrated coastal zone management strategies	Quality of shellfish Growing Areas as reported by DEHLG. Number of blue flag beaches.	Incorporate the Pollution Reduction Programmes for Shellfish Waters.
BIO4: Protect macro-corridors and contiguous areas of habitat.	Hedgerow and riverside length.	Maintenance of contiguous hedgerows, planted areas and waterways and their associated habitats.

Population		
Environmental Objectives	Indicators	Targets
POP1: Facilitate a good quality of life based on high-quality residential, working and recreational environments	Provision of employment. Provision of services. Provision of amenities.	Increase in employment opportunities. Increase and improvement of services. Increase and improvement of amenities.
POP2: Facilitate more sustainable travel patterns	Provision of sustainable travel modes.	Increase and improvement of sustainable travel in the County.
Human health		
Environmental Objectives	Indicators	Targets
HH1: 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.
Soil (including minerals)		
Environmental Objectives	Indicators	Targets
SL1: Protect and maintain the quality of soils.	EPA/Teagasc National Soils Mapping Project	Conservation of soil.
SL2: Protect and conserve geological sites.	Number and area of geological heritage sites as mapped by GSI	Retain/increase the number of geological heritage sites in the County.
SL3: Give preference to the re-use of brownfield lands,	Location and area of brownfield sites developed	Develop as many brownfield sites as appropriate and

rather than developing greenfield lands.	and permitted for development over the plan period.	possible.
SL4: Minimise the consumption of non-renewable sand, gravel and rock deposits		
SL5: Minimise the amount of waste to landfill	Amount and nature of waste to landfill and location of landfill.	Reduce amount of waste to landfill.
Water:		
Environmental Objectives	Indicators	Targets
<p>WR1: Protect and enhance the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems, in accordance with the North Western River Basin Management Plan (2009-2015).</p> <p>Protect the quality of surface and drinking water quality as sources of drinking water, assets for amenity, and recreation and ecosystem purposes.</p>	<p>Water quality monitoring results by the EPA and County Lab, for:</p> <ul style="list-style-type: none"> • Surface water ecological and chemical status • Status of Estuarine and Coastal Waters • Bathing Water Quality • Groundwater Quality • Drinking Water quality. <p>Number of Public Water Supplies on EPA remedial Action list.</p> <p>EPA data under 'Urban Wastewater Discharges in Ireland population Equivalent greater than 500 persons report for 2010-2011.</p> <p>Agglomerations over 500 in the County without Secondary Treatment.</p>	<p>Protect and restore areas identified in the NWIRBD and achieve 'good' status by 2015 in accordance with the NWIRBD objectives.</p> <p>Improvements in levels of compliance with drinking water quality standards and promotion to above national average compliance rate.</p> <p>Commission secondary treatment plants in areas with low assimilative capacity for waste water or where primary treatment is adequate.</p>

	Proportion of discharge licenses granted by the EPA that are compliant.	
WR2: Promote sustainable water use based on a long-term protection of available water resources	Water meter readings.	Improve Water Conservation
WR3: Reduce progressively discharges of polluting substances to waters	Water quality monitoring results by the EPA and County Lab, for: <ul style="list-style-type: none"> • Surface water ecological and chemical status • Status of Estuarine and Coastal Waters • Bathing Water Quality • Groundwater Quality • Drinking Water quality. 	Protect and restore areas identified in the NWIRBD and achieve 'good' status by 2015 in accordance with the NWIRBD objectives. Improvements in levels of compliance with drinking water quality standards and promotion to above national average compliance rate. Commission secondary treatment plants in areas with low assimilative capacity for waste water or where primary treatment is adequate.
WR4: Manage the risk of coastal, estuarine and fluvial flooding. Manage the risk of droughts.	Number of housing developments permitted on flood plains or lands likely to flood.	Improved flood risk management in areas prone to flooding. Reduction in incidents of flood damage to properties.
COAST/Marine Resource		
Environmental Objectives	Indicators	Targets
CM1: Avoid coastal erosion and promote coastal protection.		Conserve and enhance the coastal resource as an environment, amenity and

Manage the coastal zone as an environmental and tourist resource.		resource.
Air/climatic factors:		
Environmental Objectives	Indicators	Targets
AC1: Support implementation of National Climate Strategy 2007-2012. Reduce all forms of air pollution	National level of carbon emissions. Local Air quality monitoring results.	20% reduction in greenhouse gas emissions from 1990 levels by 2020. Full delivery of Climate Change strategies and Preparation of County Climate Change Strategies.
AC2: 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.	I-Plan results of numbers of developments permitted with renewable energies. Average daily motor vehicle flows. Proportion of travel by mode. Investment in public transport.	Reduce road traffic in line with Smarter Travel, A Sustainable Transport Future. Increased investment in cycle paths and footpaths. Consider recommendations of OREDP in Off shore wind energy developments.
Material assets:		
Environmental Objectives	Indicators	Targets
MA1: Maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources.	Availability and quality of community related infrastructure, services and facilities and status of environmental resources.	
MA2: Avoid flood risk and/or coastal erosion in selecting sites for development	Number of community related developments on vulnerable coastal sites/ sites prone to flooding.	Improved flood risk management in areas prone to flooding.

		Reduction in incidents of flood damage to premises.
Cultural heritage:		
Environmental Objectives	Indicators	Targets
CH1: Promote the protection and conservation of the cultural, including architectural and archaeological, heritage	<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 archaeological potential which have been recorded or subject to exploration as a result of development.</p> <p>Number of protected structures or archaeological monuments damaged due to development.</p>	<p>To increase the number of protected structures in line with ministerial recommendations arising from NIAH surveys.</p> <p>To increase the number and range of ACAs in the County to conserve both townscapes and demesne landscapes.</p> <p>To maintain and increase the number of archaeological features recorded and protected.</p> <p>No damage occurring to structures or monuments due to development.</p>
Landscape:		
Environmental Objectives	Indicators	Targets
LD1: Conserve and enhance valued natural and historic landscapes and features within them and avoid adverse impacts.	<p>Area of landscape designated as within Especially High Scenic Amenity.</p> <p>Preparation of a Landscape Character Assessment.</p>	<p>Conserve and enhance the County's most valued scenic landscapes.</p> <p>Appropriate Heritage Appraisal and Landscape Capacity Assessment to inform any future development of uplands, waterway corridors, demesne and coastal landscapes.</p>

5.5 RESPONSIBILITY

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