

SEA Statement on the Strategic Environmental Assessment of the County Donegal Development Plan 2018-2024



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

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1 INTRODUCTION

1.1 Terms of Reference

This is the Strategic Environmental Assessment (SEA) Statement of the County Donegal Development Plan 2018-2024.

1.2 SEA Definition

“Strategic and Environmental Assessment (SEA) is the formal, systematic evaluation of the likely significant effect of implementing a plan or programme before a decision is made to adopt the Plan or Programme”. The process includes:

- Preparing an environmental Report where the likely significant Environmental effects are identified and evaluated;
- Consulting the public Environmental Authorities and any EU member State affected on the Environmental Report and draft plan or programme;
- Taking account of the findings of the Report and the outcome of these consultations in deciding whether to adopt or modify the draft plan or programme;
- Making known the decision on adoption of the plan or programme and how the SEA influenced the outcome.”¹

1.3 Legislative Context

Directive 2001/42/EC of the European Parliament and of the Council, of 27th June 2001, on the assessments of the effects of certain plans and programmes on the environment, referred to hereafter as the SEA Directive, introduced the requirement that an SEA be carried out on plans and programmes, including 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 SEA Directive into Irish Law. Both sets of Regulations became operational on 21st July 2004. The Department of 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 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 environment authorities and, where relevant, neighbouring countries. This Statement is referred to as an SEA Statement.

¹ Assessment of the Effects of Certain Plans and Programmes on the Environment, Guidelines for Regional Authorities and Planning Authorities, November 2004.

1.4 Content of the Sea Statement

Article 131 of the SEA Regulations indicate that the SEA Statement must include information summarising:

- a. How environmental considerations have been integrated into the plan;
- b. How
 - i. The environmental report,
 - ii. Submissions and observations made to the planning authority in relation to the proposed plan and environmental report,
 - iii. Any transboundary consultations.
Have been taken into account during the preparation of the Plan;
- c. The reasons for choosing the 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 2018-2024

As a result of the aforementioned legislation, the County Donegal Development Plan 2018-2024 was required to undergo an SEA. This process included pre-scoping and formal scoping with stakeholders before the findings of the SEA were expressed in an Environmental Report which accompanied the Draft County Donegal Development Plan 2018-2024. The Environmental Report was contained within the Draft Plan as 'Part D: Environmental Report, May 2017' and assessed the likely environmental effects of each objective and policy contained within the Draft Plan; the assessment of the Objectives and Policies is contained in Table 8.4: Assessment of Strategic Policy Objectives of the Environmental Report. The Environmental Report concluded that:

"The assessment of objectives and policies contained in Table 8.4 indicate the following:

- *The implementation of the County Development Plan will have an overall positive effect on the environmental status of the County;*
- *Whilst a number of objectives and policies would have an overall positive impact, there may be certain elements of them that could also contain potential for conflict; where this arises the objectives and policies should be mitigated to an acceptable level*;*
- *The impact of some objectives and policies may be uncertain;*
- *The implementation of the Plan will not give rise to probable environmental conflicts that are unlikely to be mitigated to an acceptable level*;*

**An acceptable level means where the conflict with the status of the SEO would be rendered benign or reduce through the mitigation measures and thereby become acceptable in terms of well established principles of proper planning and sustainable development.²"*

The Draft Plan and Environmental Report were on public display from the 19th May to 1st September 2017. A report made in respect of the submissions and observations on the published Draft Plan was presented in a Chief Executives Report dated October 2017.

Donegal County Council considered the Draft Plan and Chief Executives Report (of October 2017) at an adjourned meeting on 13th December 2017 and decided to amend the Draft Plan, by proposing forty Material Alterations. These Material Alterations were made available for public consultation

² Draft County Development Plan 2018-2024; Part D: Environmental Report

during the period 9th February to 8th March 2018, accompanied by an Addendum to the Environmental Report and an Addendum to Natura Impact Report. The Environmental Report determined that all potential effects arising from the proposed Material Alterations were either present already or would not change or would be mitigated so as not to be significant; none of the Material Alterations had a probable conflict with the status of any of the SEOs, where it was unlikely that the proposed Material Alterations could be mitigated to an acceptable level. All 26 proposed Material Alterations identified a potential conflict with the status of SEOs however it was considered that all of these could be mitigated to an acceptable level through existing objectives and policies contained within the Draft Plan. 22 of the proposed Material Alterations were identified as having uncertain interaction with the status of SEOs, 26 as having neutral, 1 as having no likely interaction and 4 as being likely to improve

A further Environmental Report dated 18th April was prepared subsequent to a submission from the Minister of the Department of Housing, Planning and Local Environment received on the 8th March 2018 that recommended (inter alia) an SEA should also be carried out for Part B: Appendix 3; Development Guidelines and Technical Standards, Section 6.5 (f) as they affect policy contained within the Plan. Legal Advice sought by the Council recommended that the entire of Section 6.5 of the Plan and not merely 6.5 (f) should be assessed; thereby the Environmental report prepared by the Executive assessed Section 6.5 (a-f) of Part B: Appendix 3, of the Draft CDP. The assessment carried out by the executive concluded that:

That section 6.5(a) to (e) of the Draft County Development Plan 2018-2024 published in May 2017:-

- (i) *Would not conflict with Section 28 Ministerial Guidelines and;*
- (ii) *Would result in a combination of neutral interaction with/ no likely interaction with/ likely to improve the status of; the SEO's and;*

thereby would not give rise to any significant adverse effects on the environment.

The adoption of the Draft Plan, if it contains Section 6.5(f) of the Draft County Development Plan 2018-2024 published in May 2017, may be found not to be in compliance with the Section 28 Ministerial guidelines entitled, 'Interim Guidelines for Planning Authorities on Statutory Plans, Renewable Energy and Climate Change', published July 2017 by reason of not permitting the plan to indicate how the plan over its lifetime would contribute to realising the targets as set forth in paragraph 4(2) can be achieved since the Standard 6.5(f) is likely to create a significant limitation or constraint on renewable energy projects including wind turbines as demonstrated on the maps contained in Appendix F to this report and since it would result in an overly restrictive and limited area of land being effectively 'Open to Consideration' for wind energy proposals within the administrative area of the Donegal County Council and:

- (i) *Would thereby significantly reduce the Councils potential support for the implementation of the National Climate Strategy 2007-2012 such as to result in a probable conflict unlikely to be mitigated to an acceptable level (SEO: AC1);*
- (ii) *would significantly reduce the Councils potential contribution to the reduction of all forms of air pollution such as to result in a probable conflict unlikely to be mitigated to an acceptable level (SEO: AC2) and;*
- (iii) *Would significantly reduce the Councils potential support and promotion of a shift from fossil fuel dependent energy to more sustainable energy such as to result in a probable conflict unlikely to be mitigated to an acceptable level (SEO: AC3)³*

An additional Paper entitled "Addendum to Environmental Report of Part B: Appendix 3; Development Guidelines and Technical Standards, Section 6.5 (f)", was submitted to the Special Plenary Council Meeting of 9th May, 2018 by an Elected Member. This Paper was also considered by the Members at the aforementioned meeting, thereby also forming part of the Members' Strategic Environmental Assessment at the Special Plenary Council Meeting on the 9th May 2018. This Paper contained differing conclusions in relation to Section 6.5(f). Thus it was concluded that:

³ Environmental Report of Part B: Appendix 3; Development Guidelines and Technical Standards; Section 6.5 of the Draft County Donegal Development Plan 2018-2024, April 2018

*"The consideration of the cumulative effects of Section 6.5 (f) and the policies and objectives of the Draft CDP on the status of the SEOs, found that elements would have neutral or no likely interaction with the Status of the SEOs and that it would be likely to improve the status of the SEOs, particularly in regard to Biodiversity, Flora and Fauna, Population, Human Health, Soil, Water, Coast/Marine Resource, Material Assets, Cultural Heritage and Landscape. Regarding the SEOs in relation to Air/Climatic Factors (AC1, AC2 and AC3) it was found that the cumulative effects would have Potential Conflict with the Status of the SEOs but this is likely to be mitigated to an acceptable level."*⁴

Having considered the Draft CDP, the proposed Material Alterations, the Natura Impact Report(s), the Environmental Report(s), and the additional Paper submitted by the Elected Member, it was resolved by Members to make the County Donegal Development Plan 2018-2024 at a Special Plenary Council meeting on the 9th May 2018.

At the meeting, Members also completed their Strategic Environmental Assessment of the This Assessment had regard to, inter alia: (1.) submissions or observations received at all stages of the process; (2.) the Environmental Report of May, 2017; (3.) the Addendum to the Environmental Report of February, 2018; (4.) the Environmental Report of Part B: Appendix 3; Development Guidelines and Technical Standards; Section 6.5 of the Draft County Donegal Development Plan, 2018-2024 (as prepared by the Executive); and (5.) the Paper entitled - 'Addendum Environmental Report of Part B: Appendix 3; Development Guidelines and Technical Standards; Section 6.5 of the Draft County Donegal Development Plan, 2018-2024 (submitted by an Elected Member at the Council meeting of the 9th May, 2018). Whilst the Members were in agreement on most of their SEA process, there was some difference of opinion on their Assessment of one particular aspect of the Plan, namely Section 6.5(f) of the Technical Standards. In their consideration of this issue, Members had regard to both documents nos. (4.) and (5.) as referenced above.

Ultimately having considered both documents the Members resolved to accept:

- The conclusions of the Environmental Report prepared by the executive and dated April 2018 in relation to Section 6.5 (a-e); and
- Conclusions as set out in the Elected Member's Paper in relation to Section 6.5 (f).

At each stage of the process the Elected Members took into account the relevant documents that would inform their strategic environmental assessment process including the findings of the Environmental Report on the Draft Plan and the subsequent Strategic Environmental Assessment of the proposed Material Alterations, the Environmental Assessment of 6.5 (a-f) of the Development Guidelines and Technical Standards and the additional Paper submitted by the Elected Member to the Draft County Donegal Development Plan 2018-20124 and associated Natura Impact Report(s); thus, all submissions were taken into consideration at each stage of decision making

4 Submission from Elected Member

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 2.1: Key Steps in the SEA, AA and Plan preparation

Key Steps	Dates
Pre-Scoping SEA report	Period prior to July 2016
Pre-Draft Consultation/Scoping Report for SEA/AA	8 th July 2016 to 9 th August 2016
Chief Executive's Report on Pre-Draft Consultation/SEA/Appropriate Assessment	September 2016
Draft Plan- Public Consultation on Draft Plan/ Environmental Report/ Appropriate Assessment	19 th May to 1 st September 2017
Chief Executive's Report on Draft Plan/ Environmental Report/ Appropriate Assessment	October 2017
Adjourned Council Meeting – Resolved to make plan subject to 40 proposed Material Alterations.	13 th December 2017
Public Consultation on Material Alterations/ Environmental Report/ Appropriate Assessment	9 th February 2018 to 8 th March 2018 inclusive
Chief Executive's Report on Material Alterations/ Environmental Report/ Appropriate Assessment	2 nd April 2018
Special Plenary Council Meeting (Resolved to make Plan)	9 th May 2018

2.2 SEA Considerations

The preparation of the Environmental Report(s) on the likely significant effects on the environment of implementation of the County Donegal Development Plan included consideration of:

- Baseline data relating to the current state of the environment;
- Links between the County Donegal Development Plan and other relevant strategies, policies, plans, programmes and environmental protection objectives;
- Key environmental problems within the administrative area of Donegal, adjoining counties and also transboundary;
- The likely significant effects of policies and objectives on the environment (both positive and negative);
- Measures envisaged for the prevention, reduction and mitigation of any significant adverse effects;
- An outline of the reasons for selecting the alternatives considered; and

- Monitoring measures to ensure that any unforeseen environmental effects will be identified, allowing appropriate remedial action to be taken.

2.3 Consultations

In accordance with Article 13D (1) of the Planning & Development (Strategic Environmental Assessment) Regulations 2004 (as amended) the preliminary scoping exercise was circulated to the following statutory bodies as prescribed under article 13 A (4) of the aforementioned Regulations.

- SEA Section, Environmental Protection Agency (EPA)
- Department of Environment, Housing, Planning and Local Government (DEHPLG)
- Department of Communications, Climate Change and Natural Resources (DCCNR)
- Department of Agriculture, Food & the Marine
- Development Applications Unit, Department of Arts, Heritage, Regional, Rural and the Gaeltacht Affairs
- National Parks & Wildlife Service, Glenveagh National Park
- National Parks & Wildlife Service, Department of Arts, Heritage, Regional, Rural and the Gaeltacht Affairs
- Strategic Planning Division, Department of the Environment, Northern Ireland
- Northern Ireland Environment Agency
- Sligo County Council
- Leitrim County Council
- Fermanagh & Omagh District Council
- Derry City & Strabane District Council
- Causeway Coast and Glens Borough Council
- Cross-directorate within the Council

Nine submissions were received from the Statutory Authorities in response to the Preliminary Scoping Report; these and the Council's responses are summarised in Table 2.2.

Table 2.2: Submissions Received from Prescribed Environmental Authorities

Ref	Submission by	Issues raised	Response
1	Northern Ireland Environment Agency NIEA have made a further submission no. 7 below.	<ol style="list-style-type: none"> 1. State their anticipation that owing to the transboundary nature of the plan, any significant environmental adverse effects that would remain after all measures to reduce, prevent and offset any significant adverse effects would be of relevance to consider in NI. 2. Request that the SEA Environmental report contains a clear statement indicating the opinion (and reason for it), about whether or not the implementation of the plan would be of relevance to consider in relation to NI. 3. Request that the SEA process to assess transboundary effects and identify and incorporate adequate mitigation to ensure there are no significant environmental effects on NI. 4. References a number of useful information sources including: <ul style="list-style-type: none"> • NI State of the environment report • NI Seas Report • NI Environmental Statistics Reports • Landscape Character Assessments and Seascape Character Assessments. • UK national Ecosystems Assessment Chapter 18, NI • NI Countryside survey 5. There is no specific reference to air quality in Page 14 of the draft Scoping report. 6. The EU adaptation strategy should be added to the table on page 8. 7. Welcome the consideration of SACs and SPAs in NI, and add that 'Bann Estuary SAC' should be added to the table. Gives link to a website for further information. 8. Anticipate that any current or emerging development plan that shares a border with NI be taken into account in the development of the CDP and SEA. 9. Gives a contact for their SEA team in NI. 	<ol style="list-style-type: none"> 1. Noted, this will indeed be the case. 2. Noted, as above. 3. Noted as above. 4. Noted, reference shall be made to these data sets during the SEA. 5. The SEA shall incorporate issues relating to air quality, and local air quality. 6. The table (8) referred to has been entirely updated and includes the referenced EU Adaptation Strategy. 7. Noted, the website shall be used as part of the wider data resource. 8. Noted, the SEA shall consider all transboundary environmental issues. 9. NI SEA contact noted.

Ref	Submission by	Issues raised	Response
2	Department of Communications, NI. Historic Environment Division	States that spatial data on Northern Ireland's Historic Environment Data is available at https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets .	Noted, DCC shall refer to these and other historic datasets through the SEA process.
3.	DCNER on behalf of GSI	<ol style="list-style-type: none"> 1. Refers to online mapping resources for: <ul style="list-style-type: none"> • Aggregate potential for County Donegal, • Audit of Geological sites in County Donegal, • IGH programme, • Geothermal, • Soils and geology, • Surface water & groundwater and • Material Assets, 2. Suggest that table 2 of the existing environmental report be renamed 'List of County Geological Sites (CGS) in County Donegal'. 	<ol style="list-style-type: none"> 1. Noted, DCC shall refer to these and other geological datasets through the SEA process. 2. Noted, names and references shall be amended where required.
4.	Fermanagh and Omagh District Council	<ol style="list-style-type: none"> 1. State that the impact of any wind energy developments will extend beyond Donegal and it is important that policies should recognise such impact on the Fermanagh and Omagh landscapes and its tourism potential. Would like to ensure that such developments are sensitively located so as not to create an overbearing affect or demonstrate harm to the local landscape including iconic views. 2. State their significant interest in transboundary natural heritage and in particular SAC, SPA and Ramsar sites, and that such sites should be protected from inappropriate developments which may cause demonstrable harm to their setting and environs. 3. Request that DCC be cognisant of the relevant environmental designations in the Fermanagh and Omagh District Council Area. 	<ol style="list-style-type: none"> 1. Noted, potential effects on landscape is a key aspect of the SEA and the council fully recognise that 'landscape' sits outside political borders and will therefore be considered as such. 2. Noted, like the consideration of 'landscape', the council also fully recognise that natural heritage sits outside political borders and will therefore be considered as such. 3. Noted, the SEA shall consider all transboundary environmental designations in accordance with international and national legislation and guidance.
5.	Causeway Coast and Glens Borough Council	Sets out that the elected members of the borough council agreed to making a submission; the submission acknowledges that a SEA and AA are to be carried out as part of the CDP review and has submitted a map showing the designated sites	Noted, the SEA shall consider all transboundary environmental designations in accordance with international and national legislation and guidance.

Ref	Submission by	Issues raised	Response
		within their council area that they would like considered during the review of the CDP and also any potential impact on the Lough Foyle Ferry.	
6.	Derry City and Strabane District Council	<ol style="list-style-type: none"> 1. Submission broadly agrees with the preliminary SEA scoping report and that an SEA and AA of the County Development Plan are required. 2. Reference made to an attachment from NIEA; this was submitted as a separate submission, No 1, above. 	
7.	2 nd submission from Northern Ireland Environment Agency (in addition to sub.1)	Highlights that many of the references to the EU directives in the draft scoping report are out of date and suggests that these be updated; specific reference is made to the WFD, Bathing waters directive, and the 2008 River Basin Management Plan.	Noted, the references have been updated.
8.	EPA	<ol style="list-style-type: none"> 1. Sets out that SEA guidance for the following is available on the EPA website: <ul style="list-style-type: none"> • Integration guidance • SEA checklist • SEA spatial Information Sources • Integrating Climate Change 2. Sets out that a new application for GIS based web application that could be used to inform the SEA screening and scoping stages at www.edenireland.ie 3. Sets out the requirements to give notice to authorities pursuant to the SEA Regulations 2004, and 2011. 4. States that should further information be required to contact Cian O'Mahoney, Scientific Officer, EPA. 	<ol style="list-style-type: none"> 1. Noted, the council shall, and have, referred to the EPA guidance documents. 2. Noted, GIS is heavily used in the council's SEA process and the council welcome the additional information available on the Eden Ireland website. 3. The council have fully complied with the requirements of the SEA regulations referred to in terms of consultation with statutory authorities. 4. The council welcome the ability to contact the EPA with any further SEA related queries.
9.	Department of Agriculture, Food and the Marine.	<ol style="list-style-type: none"> 1. Sets out a list of relevant legislation, Plans and policies pertaining to potential impacts on sea fisheries and the marine environment that should be taken into account in the SEA. 2. Sets out the following issues of potential impacts for consideration in the SEA, on: 	<ol style="list-style-type: none"> 1. Noted, the list of relevant legislation, plans and policies shall be updated and shall be considered in the SEA process. 2. Noted, the council shall consider all of the areas highlighted through the SEA process.

Ref	Submission by	Issues raised	Response
		<ul style="list-style-type: none"> • Marine environmental quality including shellfish growing waters • Microbiological quality of shellfish ion the classified shellfish production areas • Human health resulting from placing on the market of microbiologically contaminated fish • Commercially imported fish and shellfish stocks, licensed aquaculture sites and areas important for fish/jellyfish • Freshwater aquaculture operations including requirement for water abstraction and capacity of receiving waters to assimilate discharges • Future designations of areas of importance to the aquaculture and fisheries sector • Relevant EU Directives and National legislation in the area of Marine Spatial Planning <p>3. Gives details of where marine data can be sourced including GIS and reports.</p> <p>4. Sets out a number of bodies that should/could be consulted specifically in relation to the marine.</p>	<p>3. The council welcome the provision of sources for marine data.</p> <p>4. The council welcome details of who to contact to discuss/retrieve this data.</p>

2.4 How Consultations Informed the SEA Process

Subsequent to the pre-scoping consultation exercise, a Scoping Report for the SEA of the Draft Plan was presented as part of the Pre-Draft Plan consultation undertaken between the 8th July and the 9th August 2016. The submissions received informed both the making of the Draft Plan and the SEA process. The Draft Plan and accompanying Environmental Report were on public display from the 19th May to 1st September 2017, during which time 312 submissions and observations were made.

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. Forty Material Alterations were published with an accompanying SEA Environmental Report and were made available during the final public consultation period on the proposed Material Alterations that took place between 9th February 2018 to 8th March 2018 inclusive. The proposed Material Alterations that were published for public consultation consisted of the following three documents:

- Proposed Material Alterations to the Draft County Donegal Development Plan 2018-2024 (including Appendix A), February 2018.
- Strategic Environmental Assessment of Proposed Material Alterations to the Draft County Donegal Development Plan 2018-2024: Addendum to Part D Environmental Report, February 2018.
- Addendum to Appropriate Assessment: Natura Impact Report of Proposed Material Alterations to the Draft County Donegal Development Plan 2018-2024 (including Appendices A-C), February 2018.

A total of 32 no. submissions or observations were received; 16 no. were received from the public and 16 no. were received from Statutory Consultees. A report on the submissions and observations made in respect of the proposed Material Alterations and accompanying Environmental Report was presented in a Chief Executives Report to the Members of Donegal County Council in April 2018.

The Members resolved to make the County Donegal Development Plan 2018-2024 having considered the Chief Executive's Report dated 2nd April 2018 in relation to the 40 Proposed Material Alterations and having:-

1. Completed the Strategic Environmental Assessment process taking account of the information contained within, inter alia:
 - (i) The Environmental Report (May 2017) of the Draft Plan and;
 - (ii) The addendum Environmental Report relating to the Proposed Material Alterations (February 2018) and;
 - (iii) The additional Environmental Report (April 2018) relating to Part B, Appendix 3, Development Guidelines and Technical Standards, Section 6.5 on Wind Energy.
 - (iv) The submission made by an Elected Member, circulated on Tuesday 1st May, relating to Part B, Appendix 3, Development Guidelines and Technical Standards, Section 6.5 (f) on Wind Energy.
2. Completed the Appropriate Assessment process taking account of the information contained within, inter alia:
 - (i) The Natura Impact Report (May 2017) of the Draft Plan and;
 - (ii) The addendum Natura Impact Report relating to the Proposed Material Alterations (February 2018) and;
 - (iii) The additional Natura Impact Report (April 2018) relating to Part B, Appendix 3, Development Guidelines and Technical Standards, Section 6.5 on Wind Energy.

2.5 Appropriate Assessment

The application of AA in Ireland, as required by the Habitats Directive, is primarily governed by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011 as amended by S.I. No. 355 of 2015), and the Planning and Development (Amendment) Act 2010 (Part XAB), as amended by the Environment (Miscellaneous Provisions) Act 2011. A range of guidance on carrying out appropriate assessment, and interpretation of relevant legislation is available.

The EU Habitats Directive (92/43/EEC), Article 6, and as transcribed into Irish law requires that:

"Any plan or project not directly connected with or necessary to the conservation of a site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives."

An Appropriate Assessment was undertaken in tandem with the SEA process to assess whether the County Donegal Development Plan 2018-25024, individually or in combination with other plans or projects, is likely to have significant adverse effect on a designated Natura 2000 site (comprising Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)). The AA process resulted in the recommendation of 41 amendments to text, addition of policies and addition of objectives prior to the publication of the Draft Plan. The proposed additions/deletions/amendments, were considered during the drafting of the Plan and Table 4.3 in this Report contains all additional objectives, policies and references contained within the Plan as informed through the AA and SEA process

Table 2.3: Recommended Changes to the Policies and Objectives of the Draft CDP to ensure adequate mitigation of any potential impacts on the Natura network

Chapter	Objective, Policy or reference in the Plan	Additional Policy Objective or Reference Added to the Draft County Development Plan
Economic Development	ED-P-8	Natura 2000 network added to policy statement: 'and the protection of areas designated as being of Especially High Scenic Amenity (EHSA) and the Natura 2000 network'
	ED-P-10	Text added '(except ED-P-14 (i) which is a statutory requirement)'
	ED-P-14	Compliance with Article 6 added to statement: 'and complies with Article 6 of the Habitats Directive'.
	ED-P-14	Paragraph (n) amended to read: 'it does not compromise water quality nor conflict with the objectives and programme of measures contained within the relevant River Basin Management Plan'.
Transportation	New Policy Added: T-P-36	'It is a policy of the Council that all developments relating to transportation will comply with Article 6 of the Habitats Directive in relation to protection of Natura 2000 sites and the integrity of the Natura network.'
Water and Environmental	WES-O-5	Text added to objective: 'and to protect Natura 2000 sites in accordance with Article

Services		6 of the Habitats Directive'.
	WES-O-6	Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes',
	WES-O-6	Text added to second bullet of objective: 'against soil contamination and loss'.
	WES-O-6	Text added to third bullet of objective: 'and light pollution'.
	WES-O-11	Text added to objective: 'while ensuring compliance with Article 6 of the Habitats Directive'.
	WES-P-3	Text added to policy: 'and to manage development so that it is permitted only where adequate wastewater treatment capacity exists, or will become available, within the life of a planning permission'.
	WES-P-11	Minor text addition to specify EPA Code of Practice.
Telecommunications	TC-O-1	Text added: 'and compliance with Article 6 of the Habitats Directive'.
Urban Housing	UB-P-14	Text added: 'including compliance with Article 6 of the Habitats Directive'.
	UB-P-15	Text added: 'including compliance with Article 6 of the Habitats Directive'.
Rural Housing	RH-O-6	Bullet 3 text amended to read: 'the relevant River Basin Management Plan'.
	RH-P-1	Text amended to read: 'the relevant River Basin Management Plan'.
Natural and Built Heritage	7.1.1 Background - Appropriate Assessment	Text amended to confirm that AA is required where there is potential for impact on Natura 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 is subject to Appropriate Assessment.'
	NH-O-6	Minor text change to 'Shellfish Pollution Reduction Programme'.

Extractive Industry	EX-P-2	Policy amended to read: 'proposals will not normally be permitted where they could adversely impact upon any Natura 2000 site'
Wind Energy	E-P-18	Text amended to include hydrology assessment: 'impacts on archaeological monuments, hydrology and watercourses'.
	New Policy Added: E-P-20	'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'
	New Policy Added: E-P-21	'It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required.'
Tourism	T-P-1	Text amended from 'environmental habitats' to 'environmental heritage'.
	T-P-20	Text of paragraph (o) amended to read: 'The development will not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.
Marine Resource and Coastal Management	MRCM-O-2	Text of first bullet amended to read: 'Protecting the ecological integrity, qualifying habitats and species of Natura 2000 sites through Appropriate Assessment of development proposals'.
Community, Culture and the Gaeltacht	CCG-P-4	Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.
Letterkenny Economic Development	LK-ED-P-1	Text of policy amended to include: 'and comply with Article 6 of the Habitats Directive'.
	LK-ED-P-5	Text of policy amended to reflect riverside location and possible proximity of developments to SPA by addition of: 'and comply with Article 6 of the Habitats Directive'.
Letterkenny Opportunity Sites	LK-OPP-P-4	Text in policy amended to read: 'Subject to the environmental and amenity considerations related to the above, including compliance with Article 6 of the Habitats Directive'.
	LK-OPP-P-5	Text in paragraph (c) amended by addition of: 'and complies with Article 6 of the Habitats Directive'.

Buncrana Economic Development	BC-ED-P-8	Text in policy amended by addition of: 'and must comply with Article 6 of the Habitats Directive'.
Buncrana Housing	BC-H-P-1	Text amended by addition of: 'and must comply with the requirements of Article 6 of the Habitats Directive'.
	BC-H-P-4	Text amended by addition of: 'and must comply with the requirements of Article 6 of the Habitats Directive'.
Buncrana Natural Heritage	14.5 Natural and Built Heritage paragraph 2	Text amended to include SPAs: 'The area of the Bundoran and Environs consists of many resources in terms of the natural and built heritage, in the form of special designations (SPAs, SACs, NHAs),'
Bundoran Housing	BD-H-P-1	Text of policy amended by addition of: 'and must comply with the requirements of Article 6 of the Habitats Directive'.
	BD-H-P-3	Text of policy amended by addition of: 'including compliance with the requirements of Article 6 of the Habitats Directive'.
Bundoran Natural Heritage	BD-SO-BH-1	Text of the policy is amended by addition of: 'and shall have regard to policy NH-P-1 of this Plan'.
Bundoran Tourism	BD-TO-P-1	Text of the policy is amended by addition of: 'in particular policy NH-P-1 of this Plan'.
Bundoran Marine Resource and Coastal Management	14.8 Marine Resource and Coastal Management - Background	Text added to highlight that foreshore works have potential to impact on the Donegal Bay SPA and are subject to AA: 'Works affecting the Coastal Management Zone will be required to obtain a Foreshore License, and will require screening for Appropriate Assessment to determine if they have potential to adversely impact on the conservation status of the Donegal Bay SPA, and the Local Authority shall be notified of any proposed works in this area'.
Bundoran School Facilities	BDSCC-P-2	Policy amended by addition of text: 'subject to compliance with the requirements of Article 6 of the Habitats Directive'.

Further Appropriate Assessments were carried in tandem with (i) the publication of the Material Alterations and (ii) the Environmental Assessment of Part B:Appendix 3; Development Guidelines and technical Standards; Section 6.5. Based on the Natura Impact Report(s) with reference to the scope of the Plan, Donegal County Council has determined that no direct, indirect or cumulative significant effects on Natura 2000 sites were likely.

2.6 Environmental Pressures and Vulnerabilities

Environmental considerations were integrated into the Draft Plan before it was placed on public display for the first time. The environmental vulnerabilities and pressures were identified subsequent to the consideration of the current state of the environment, identified through existing data and including associated spatial digital data. The spatial data was compiled and mapped identifying both the locations and extent of specific areas in the County that 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, Figures 2.1-2.14 below refer. 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 3). The environmental sensitivities and overlay mapping shown on Figures 2.1-2.14 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 4 of this report.

Figure 2.1: Vulnerability Mapping in County Donegal

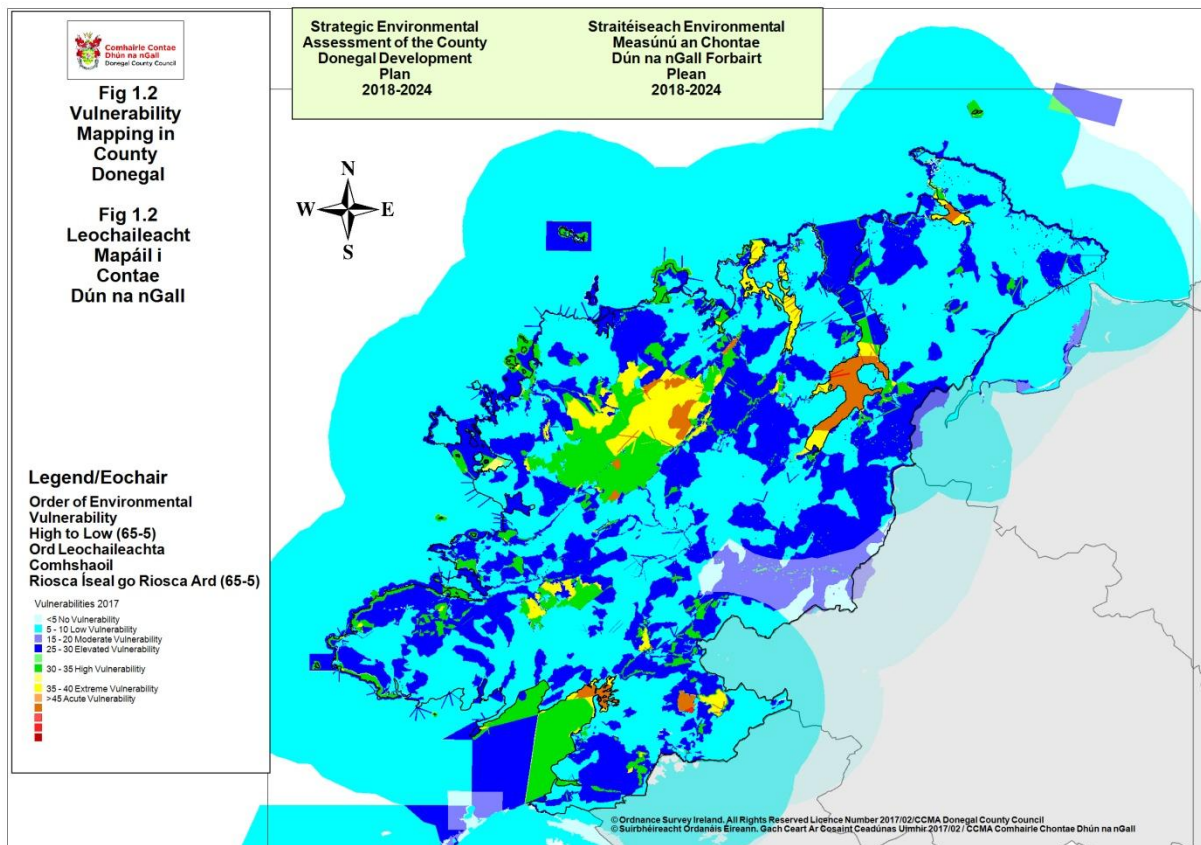
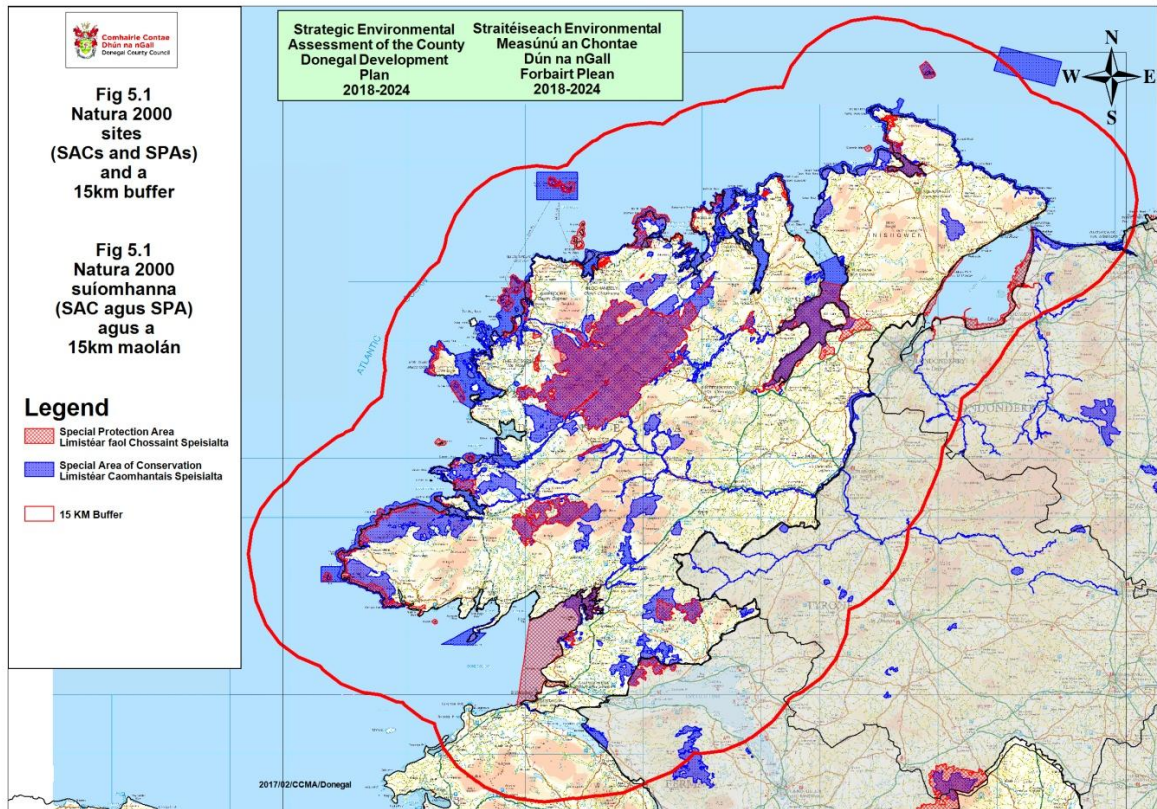
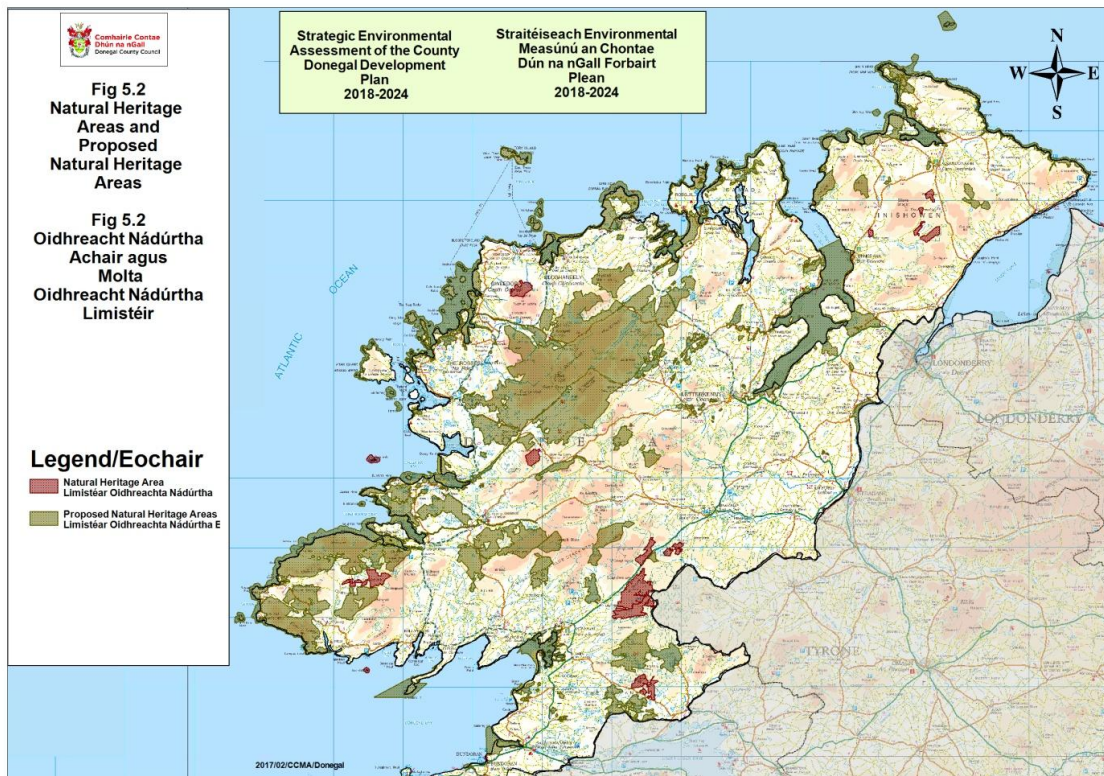


Figure 2.2: Location of Natural Heritage Areas and Proposed Natural Heritage Areas



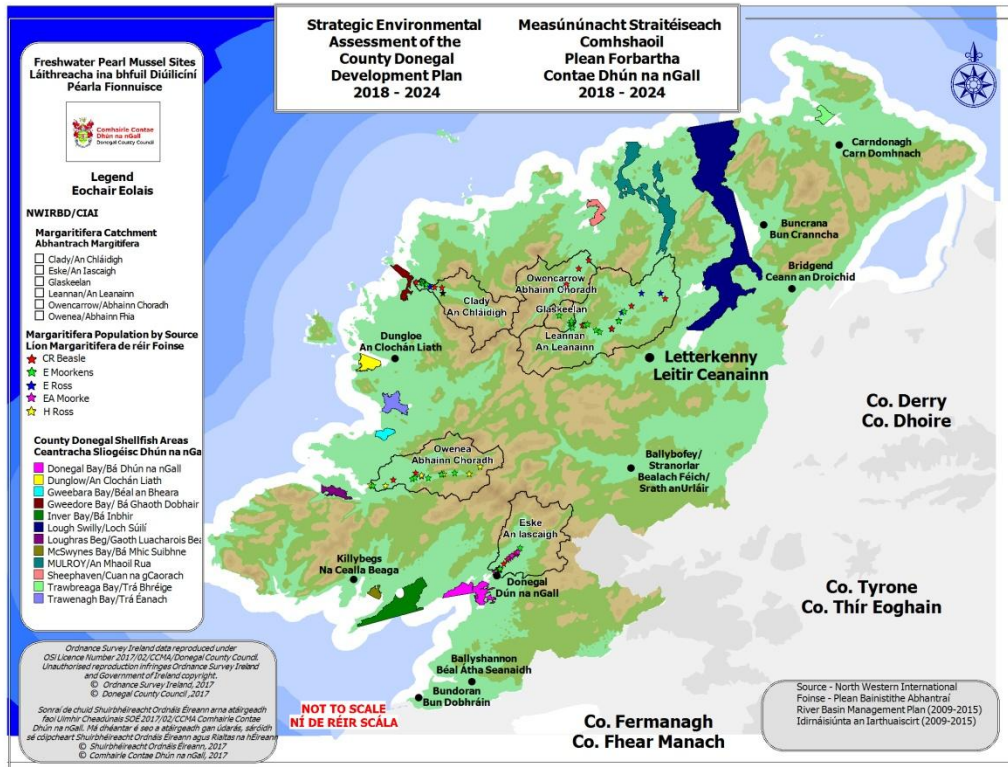
(Source: Figure 5.1 Environmental Report, Part D CDP 2018-2024)

Figure 2.3: Location of Natural Heritage Areas and Proposed Natural Heritage Areas



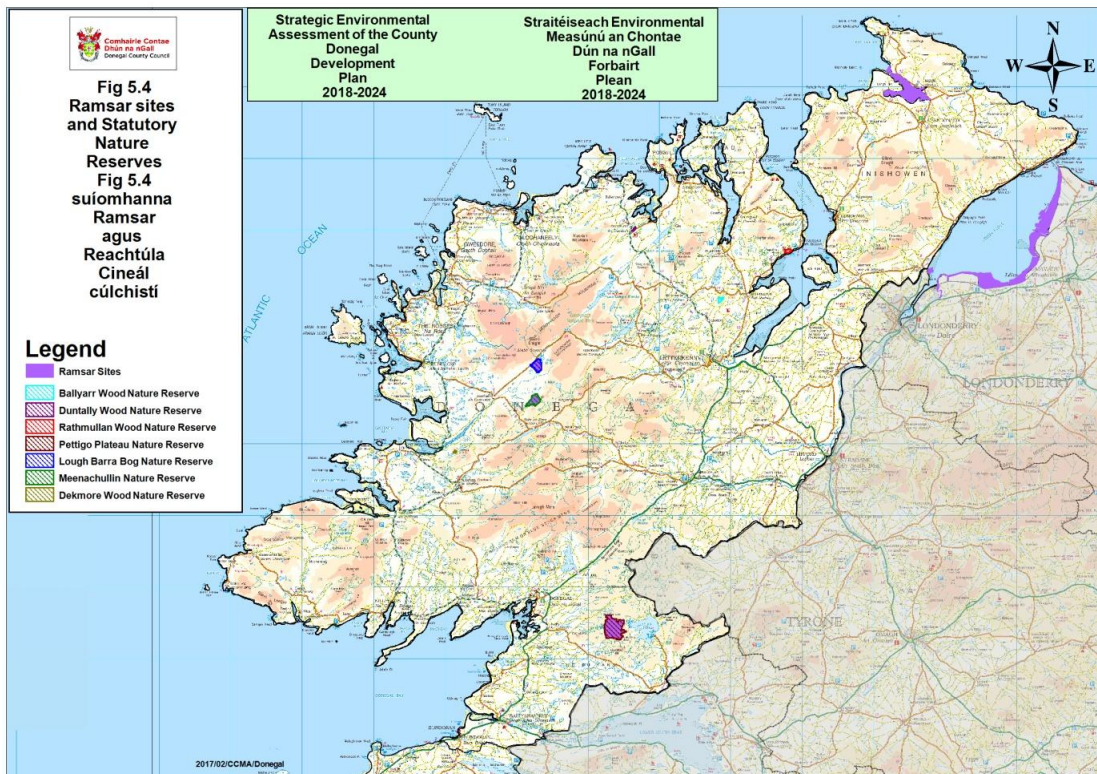
(Source: Figure 5.2 Environmental Report, Part D CDP 2018-2024)

Figure 2.4: Illustrating Freshwater Pearl Mussel catchments and sites and Designated Shellfish Waters in County Donegal



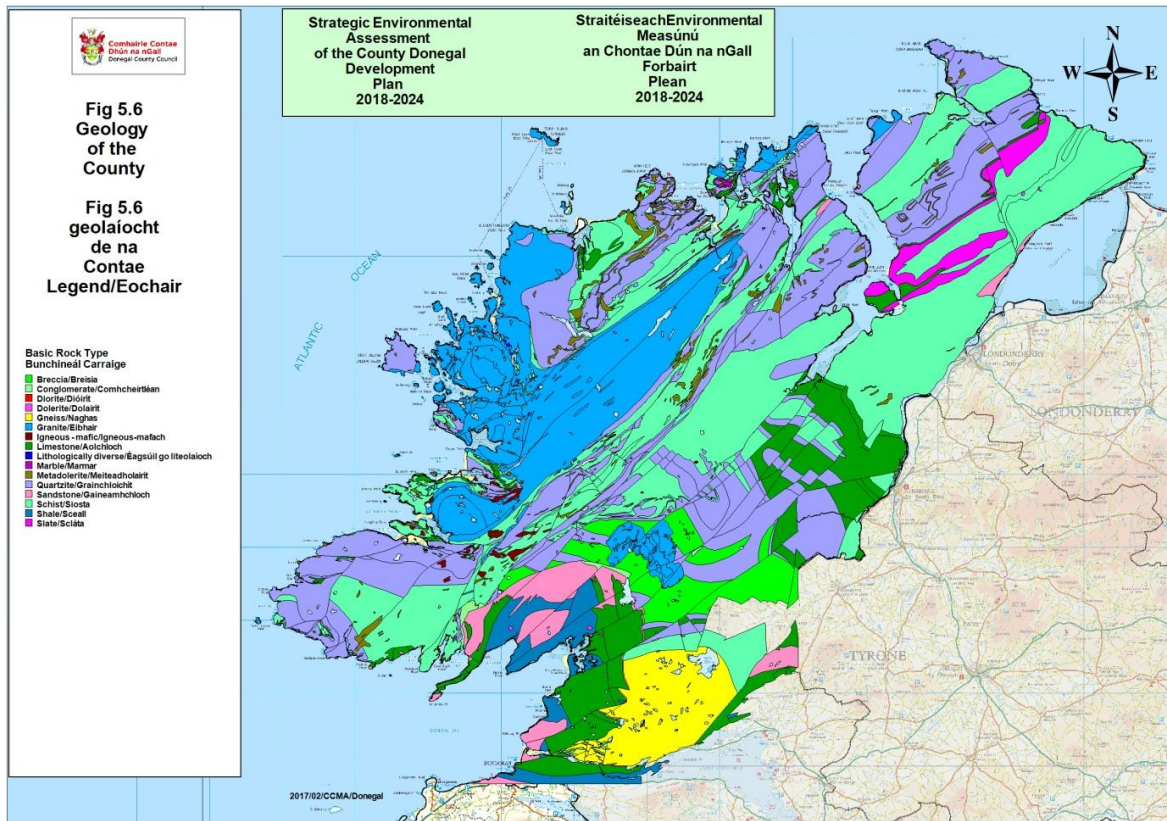
(Source: Figure 5.3 Environmental Report, Part D CDP 2018-2024)

Figure 2.5: Ramsar Sites and Statutory Nature Reserves in County Donegal



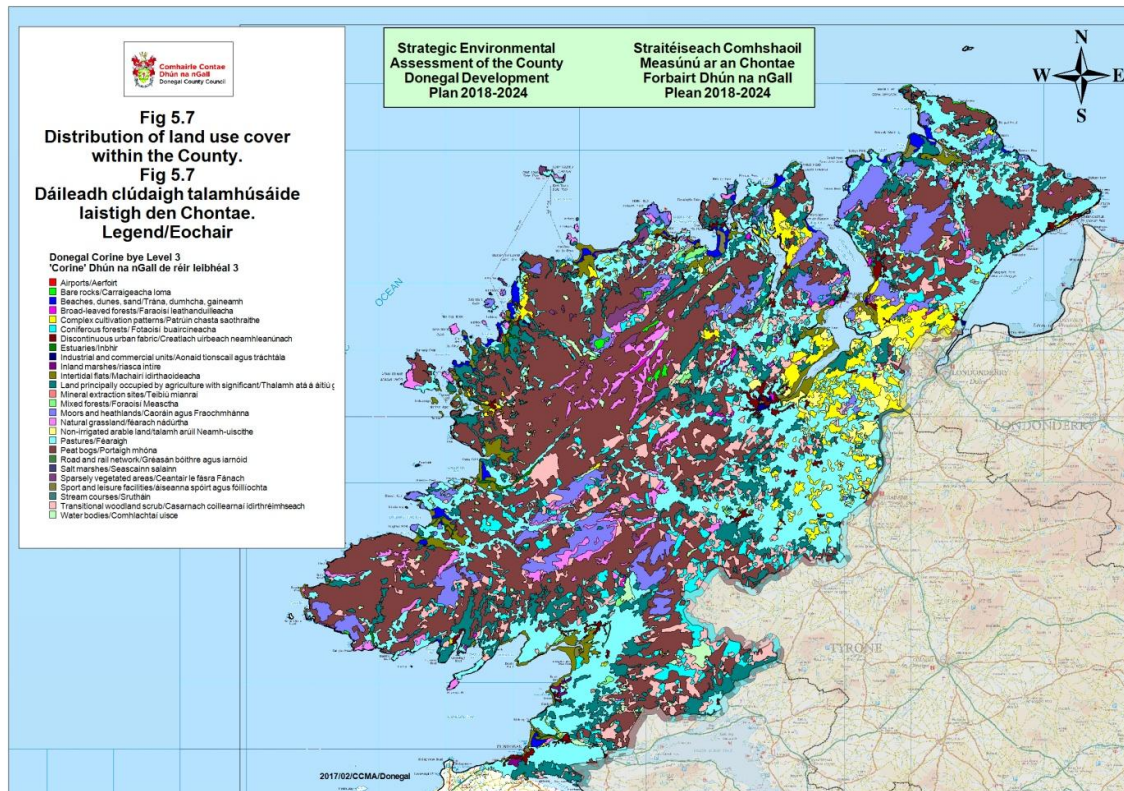
(Source: Figure 5.4 Environmental Report, Part D CDP 2018-2024)

Figure 2.6: Geology of the County



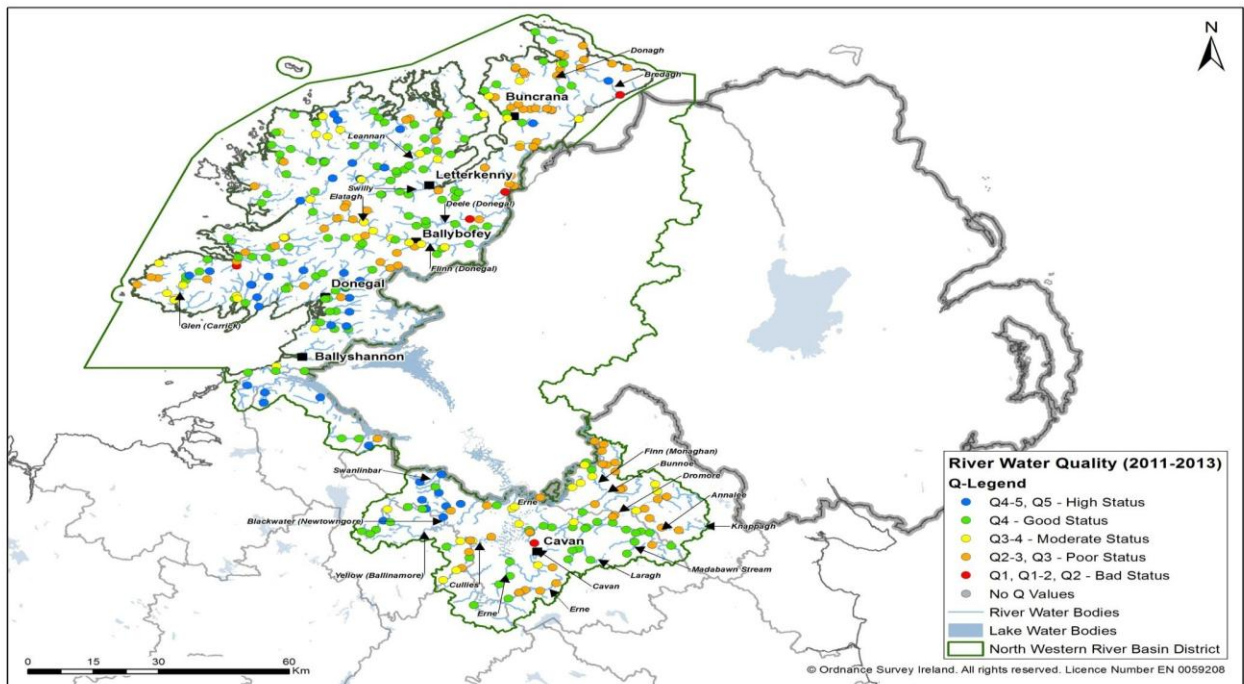
(Source: Figure 5.6 Environmental Report, Part D CDP 2018-2024)

Figure 2.7: Distribution of Land Cover Within the County



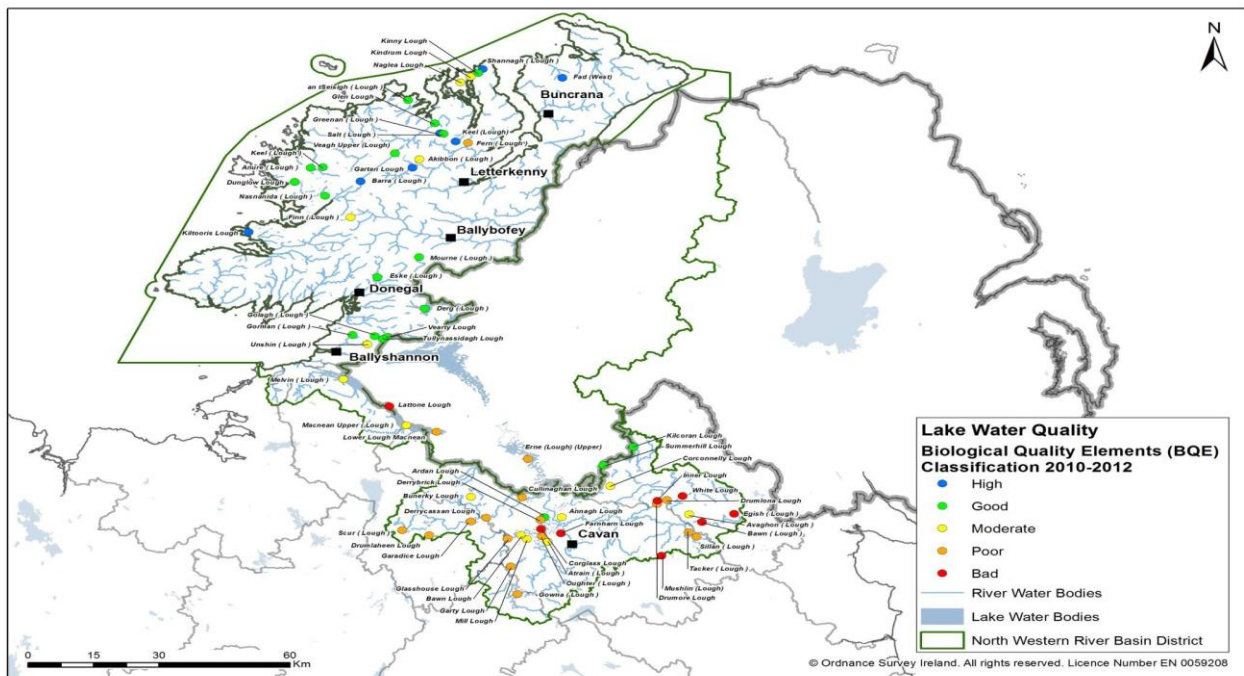
(Source: Figure 5.7 Environmental Report, Part D CDP 2018-2024)

Figure 2.8: Biological classification of rivers in the NWIRBD 2011–2013



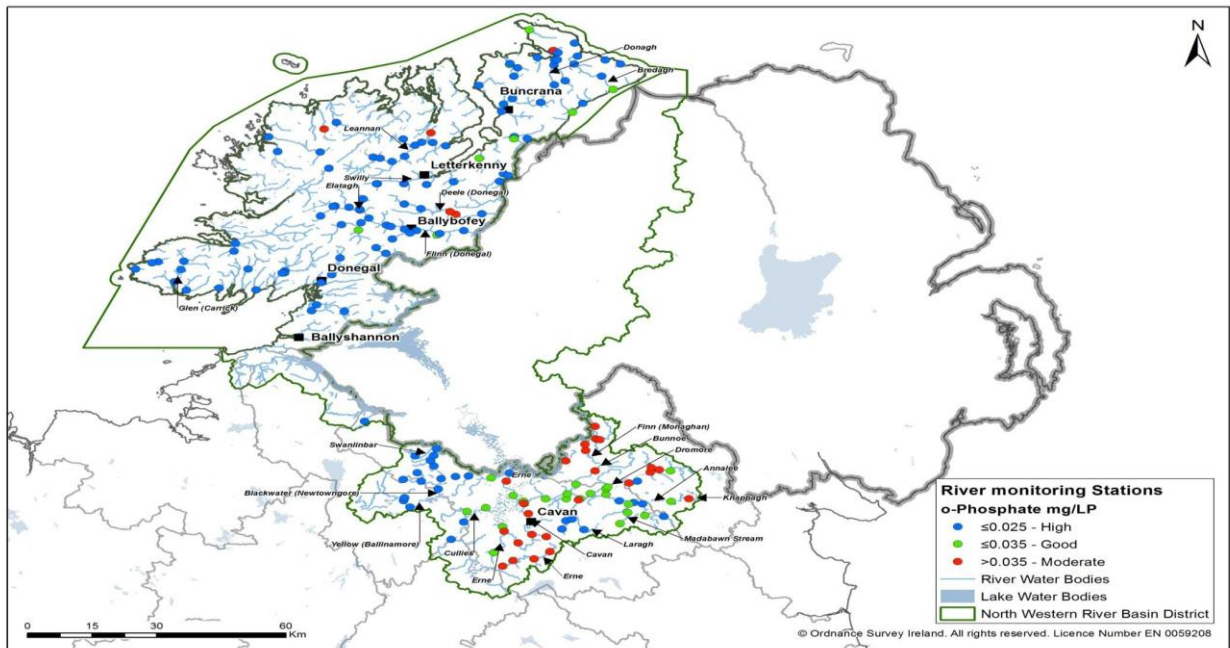
(Source: Integrated Water Quality Assessment 2013, & Neagh North Western Bann River Basin' (2013), Map 11, pg. 37)

Figure 2.9: Biological status of lakes in the NWIRBD 2007–2013



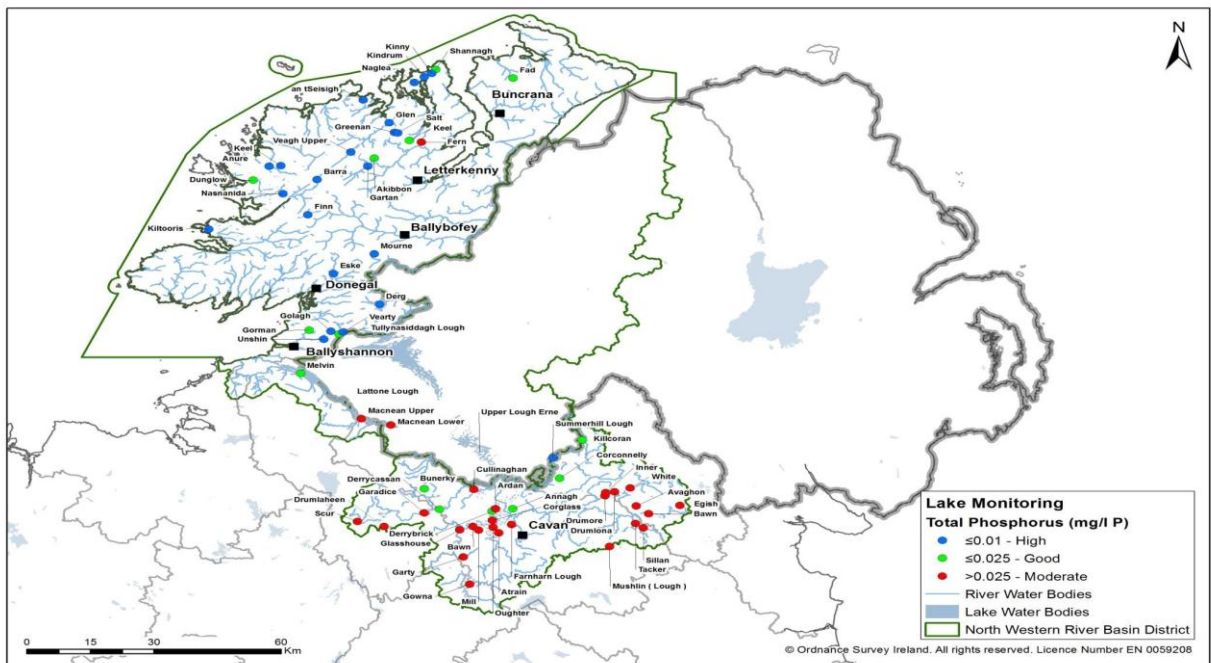
(Source: Integrated Water Quality Assessment 2013, & Neagh North Western Bann River Basin' (2013), Map 14, pg. 47)

Figure 2.10: Average ortho-phosphate in NWIRBD Rivers in 2013



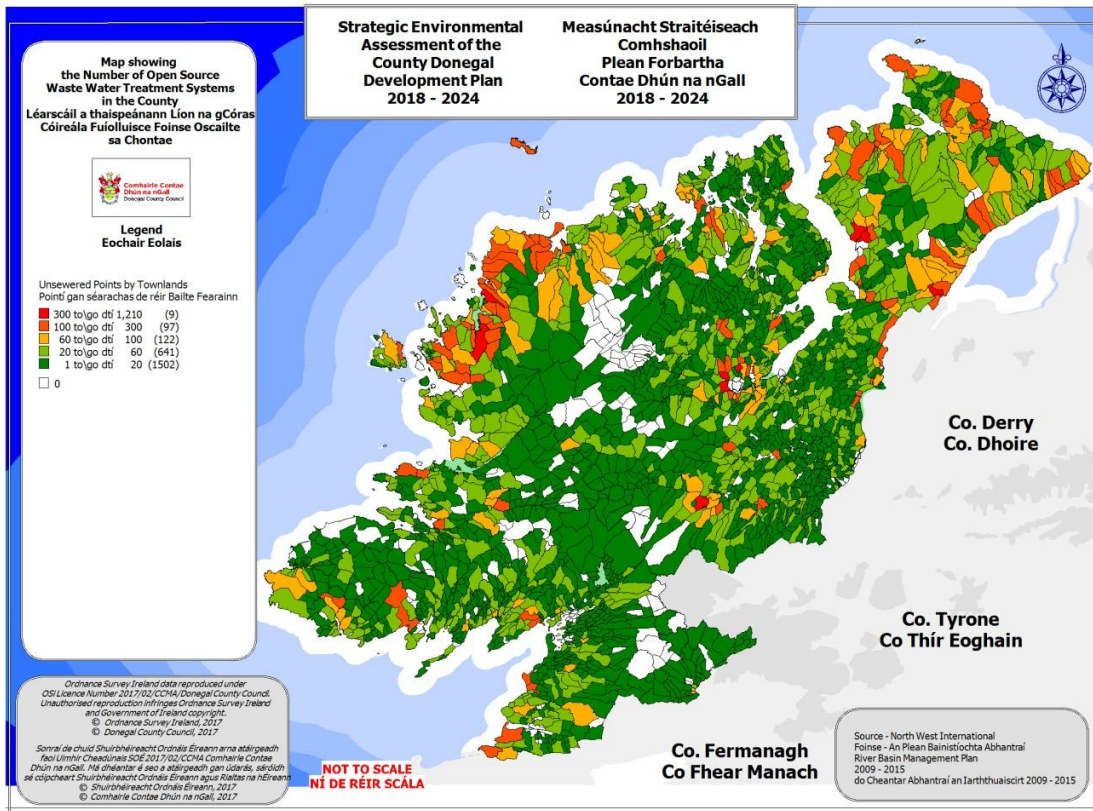
(Source: Integrated Water Quality Assessment 2013, & Neagh North Western Bann River Basin' (2013), Map 1, pg. 5)

Figure 2.11: Average total phosphorus in NWIRBD Lakes in 2013



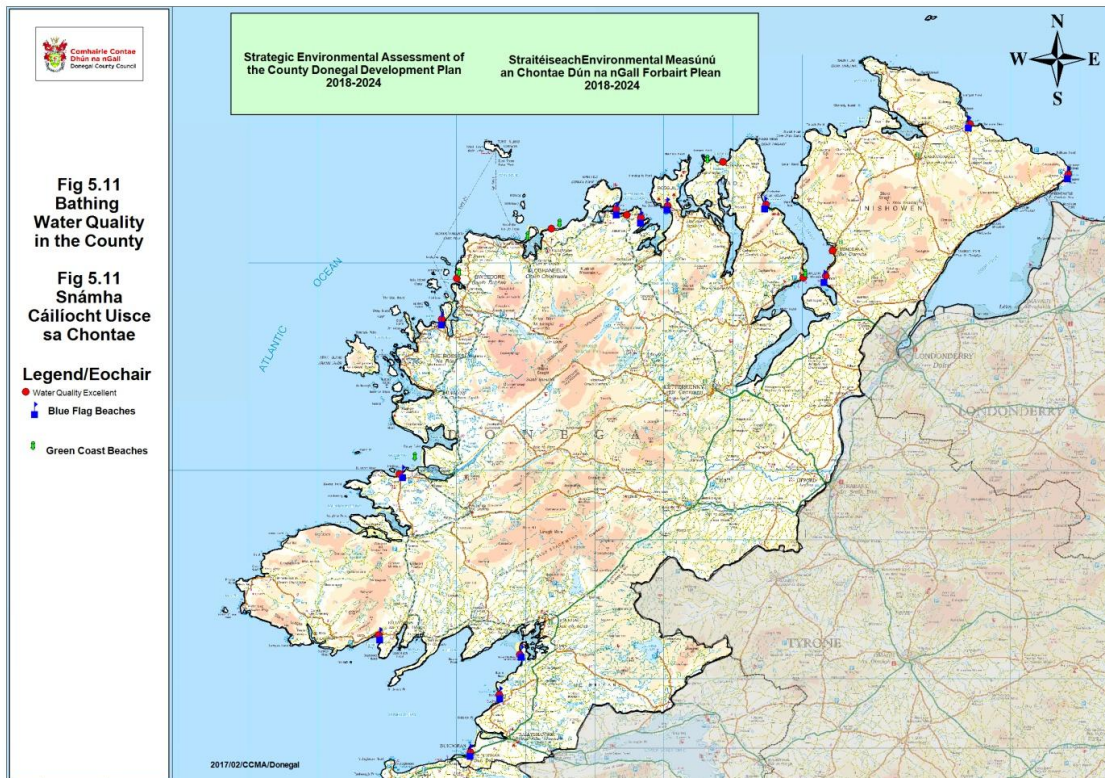
(Source: Integrated Water Quality Assessment 2013, & Neagh North Western Bann River Basin' (2013), Map 3, pg.15)

Figure 2.12: Number of Unsewered Properties in the County



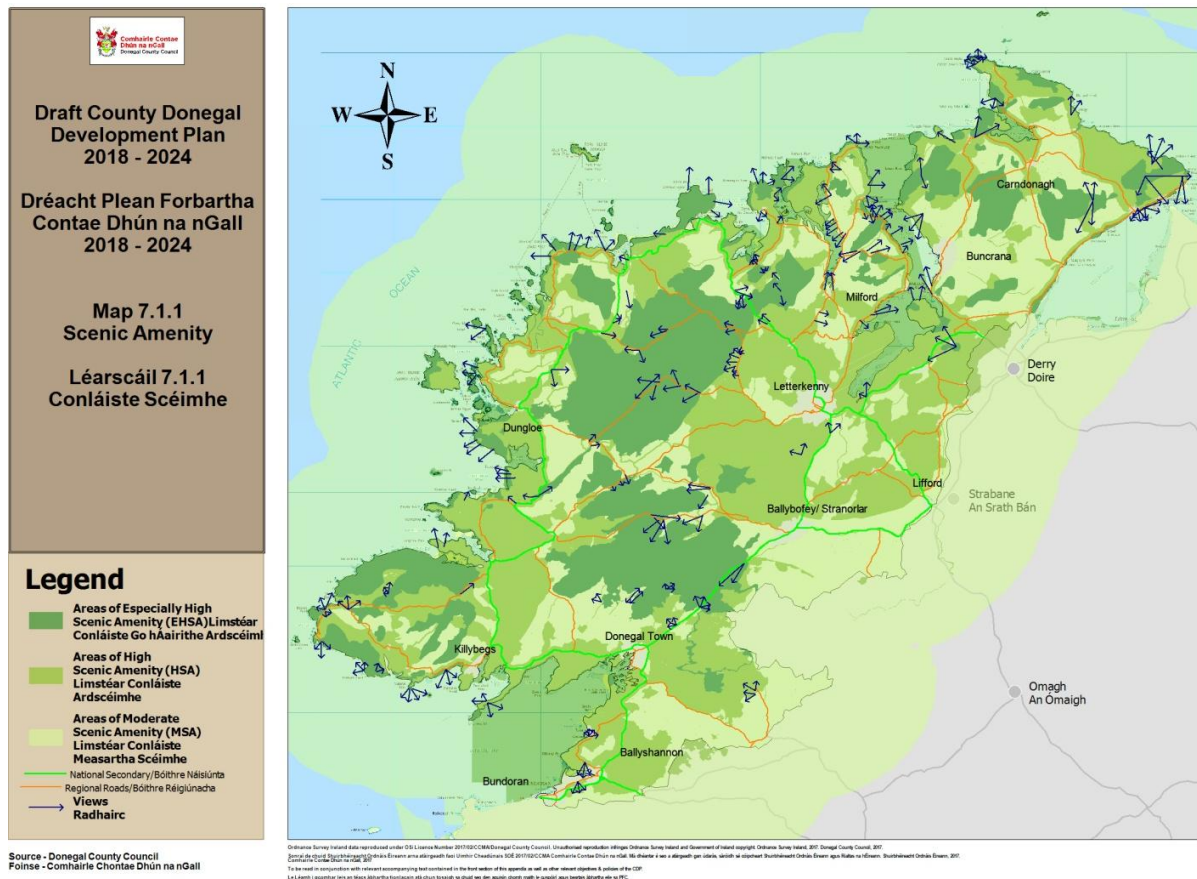
(Source: Figure 5.10 Environmental Report, Part D CDP 2018-2024)

Figure 2.13: Bathing Water Quality in the County



(Source: Figure 5.11 Environmental Report, Part D CDP 2018-2024)

Figure 2.14: Scenic Amenity Map – extract From Part B of Draft County Development Plan



(Source: Map 7.1.1: Chapter 7, Part B CDP 2018-2024)

2.7 Flood Risk

At a strategic level the plan considers that the Draft Flood Risk Management Plans for UoM 1,35 and 36 and the associated Flood Hazard Mapping collectively constitute a significant resource in terms of the future management of development in Donegal vis-à-vis flood risk. In this regard this plan has utilised said Flood Risk Management Plans and Flood Hazard Mapping as a strategic framework to inform zoning designations to guide the location of new development and infrastructure. In addition, the Council has completed a Stage 1 Strategic Flood Risk Assessment (SFRA) for the 62 towns and villages that comprise the Settlement Structure of the Core Strategy, and arising from this work, a Stage 2 SFRA shall be undertaken in ten settlements as part of a Local Area Plan process – namely Letterkenny, Buncrana, Bundoran, An Clochán Liath, Ballybofey-Stranorlar, Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs.

The plan adopts a policy framework for managing flood risk based on; assessing new development proposals in accordance with the sequential and precautionary approaches identified in the abovementioned Flood Risk Management Guidelines, and requiring, as appropriate, the submission of Flood Risk Assessments and justification tests as detailed in said guidelines. The plan also recognises that there may be other flood risk locations not identified in the CFRAM Flood Hazard mapping nor identified as requiring a Stage 2 Flood Risk Assessment and provides for the utilisation of other available datasets in the management of flood risk in such circumstances. (e.g. The Historic flood maps available on www.floodmaps.ie, the OPW's Coastal Protection Strategy Study Mapping).

Likely Environmental Effects of Flood Related Policies and Objectives of the Plan:

Overall it is considered that the flood related policies and objectives within the plan will reduce the adverse consequences of flooding on human health, the environment and heritage by:

- Implementing the precautionary principle and sequential approach detailed in the publication 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities' (DoEHLG 2009 including; avoiding development in flood risk areas, substituting less vulnerable for more vulnerable developments, justifying new development at strategic locations where avoidance and substitution are not possible and mitigating the impact of flooding through the design and layout of new developments.
- Basing zoning designations and future decision making for new development and infrastructure on evidence based assessments in the form of a Stage 1 Flood Risk Assessment (and where appropriate, a Stage 2 Assessment as part of the ongoing local area plan process), the flood risk hazard mapping prepared as part of the CFRAMS study and other appropriate flooding datasets.

On consideration of the baseline evidence as summarised above, environmental pressures within the county were identified in the context of each topic of environmental consideration and table 2.4 below presents such environmental issues and pressures, however this is not exhaustive.

Table 2.4: Summary of Main Environmental Pressures within the County

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

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

3 IDENTIFICATION AND EVALUATION OF ALTERNATIVES

3.1 Alternative Approaches to the Plan

The Plan was prepared during a period when the National Spatial Strategy, 2002 (NSS) was still in place and when the National Planning Framework (NPF) was only an emerging piece of work.

Notwithstanding, it was noted in the Draft Plan that the Plan '...is, in so far as is practicable aligned with the key issues that are emerging to date through the preliminary commentary around the NPF.' It is in this context that the following commentary in relation to the Plan's compliance with the NSS should be read.

The Border Regional Planning Guidelines (RPG's) published in 2010 set out a long-term strategic planning framework for the proper planning and development of the Region (comprising of the Counties of Donegal, Sligo, Leitrim, Cavan, Monaghan and Louth). The RPG's provide a Core Strategy for the region and population growth targets across each county. In the case of County Donegal, these are set out within the 'Planning Context' on the following pages. The population growth projections within which the Plan is prepared are within the overall parameters of the current Regional Planning Guidelines, 2010 and aim to grow the population of the County to circa 173,000 people by 2024 and to 209,000 people by 2038.

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 and that responds to the opportunities to grow the North West Region positively both in relation to critical mass and economic development.

3.2 Planning Context

The County Development Plan 2018-2024 is set within a hierarchy of strategic planning policy across the national, regional and local contexts. Taken together, the suite of plans are to deliver a coordinated and integrated development approach for the region. The National Spatial Strategy 2002 (NSS) and the Border RPG's 2010 are the current national and regional planning frameworks with which consistency of the Plan is to be demonstrated and these are to be replaced in due course through the preparation of the National Planning Framework (NPF) by the Department of Housing, Planning, Community and Local Government (DHPCLG) and a Regional Spatial and Economic Strategy (RSES) by the Northern and Western Regional Assembly.

The NSS 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 and it identified Letterkenny as a linked gateway with Derry. A Strategic Issues Paper was published by DHPCLG on 2nd February 2017 to inform consultation in relation to the preparation of the NPF to be followed by a draft NPF in due course. The strategic issues paper references the cross border relationship of County Donegal with Northern Ireland and in particular refers to the joint collaborative work of Donegal County Council and Derry City & Strabane District Council, through the North West Strategic Growth Partnership, to provide a place-based approach to accelerate sustainable growth, driven by local leadership and supported and guided by central policy.

The Border RPG's identified a total population growth for the entire of the County, of 12,927 persons to 2016 (leading to a County population of 171,337 in 2016 census) followed by an anticipated additional 10,413 people by 2022 (leading to a County population of 184,450 by 2022). The actual population of County Donegal in the 2016 census fell short of the projected growth provided in the RPG's by 12,582 people.

3.3 Alternatives

Three alternative approaches are considered in order to distribute the projected population growth across the County, as follows:

1. Business As Usual
2. Urban- Centric Model
3. Effective Urban-Rural Development

3.4 Details of the Alternative Approaches

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

Alternative 1: Business As Usual

This approach would involve the continuation of existing patterns of development and minimal intervention in relation to strategic planning policy described as 'Business As Usual'. 'Demand' rather than 'need' would drive development patterns. The predominant development patterns would involve continued dispersed settlement patterns, growth of individual rural housing units in the rural area, depopulation of town cores and growth in towns predominantly occurring on the edges at semi-rural locations. In addition, a 'Business As Usual' approach would be likely to contribute to continued population change trends showing a declining and ageing population in the West and North-West of the County and strengthening of population together with a younger age profile in the East and South-East.

This development pattern would weaken the capacity of towns to support economic growth and viability. There would be a risk of pressure for development at locations with insufficient 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. It would also reduce capacity to spatially coordinate employment and skills base/human capital.

The 'Business As Usual' approach would not respond in a prioritised manner to the County's opportunities that are being identified in a regional context in terms of tapping into and harnessing particular economic strengths that are distributed throughout the extent of the County. In addition, it would not respond to the opportunities and issues arising from Brexit.

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 environmental legislation, with damage to environmentally sensitive areas.

Having regard to the foregoing, it is considered that this approach would not be the optimum strategic development approach for the Plan.

Alternative 2: Urban- Centric Model

This approach would result in absolute concentration of new development to Letterkenny and to the key population settlements that provide a supporting role to the Letterkenny; namely Ballybofey-Stranorlar, Bunrana, Donegal Town, Ballyshannon, An Clochán Liath (Dungloe), Killybegs, Bundoran 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 be expected to increase significantly in the rural areas over the lifetime of the plan except through natural increase and uptake of previous planning permission and of vacant units. Investment in infrastructure, both hard and soft would be concentrated in Letterkenny and the 8 key supporting towns.

This approach would aggressively prioritise and strengthen Letterkenny and the County's key supporting 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. It would overlook the potential that exists elsewhere in the County to harness and strengthen existing and new economic activity. It would significantly contribute to a deepening of population change patterns across the North/North-West and South/South- East axis.

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

- Drive critical mass in Letterkenny and the 8 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: Effective Urban-Rural Development

This approach would focus on 'effective' urban- rural development responding to the role of the County in the regional context (in relation to the North West City Region and the area of the Northern & Western Regional Assembly) with a particular emphasis on the pillars of economic growth, physical development and social and community planning.

This approach would recognise the role of settlement in the economic development of the County and would support the importance of a successful and competitive Letterkenny with resultant benefits and opportunities for the entire County and North West Region. In addition to Letterkenny, it would identify a larger number of key towns, described as Strategic Towns, due to either their infrastructural capacity to accommodate population growth and/or their characteristics as towns that perform special economic functions at present or have the potential to do so in the future. The Strategic Towns would be distributed throughout the County and their development and strengthening would facilitate the provision of vital services and facilities as well as local employment to support the surrounding rural hinterlands. Their regeneration and renewal, focussed on their particular special function would be prioritised in the plan. Alongside a strategy to strengthen, renew and regenerate urban areas, the plan would recognise the rural nature of the County and sufficient growth would be provided for within rural areas where genuine rural need can be demonstrated together with a focus on appropriate servicing, siting, location and design. Within this approach, 30% of projected growth would be anticipated to occur in Letterkenny, 34% in the 'Strategic Towns' and 36% in rural towns and open countryside.

This approach would be driven through a set of determined 'interventions' to stimulate and accelerate further growth. Such 'Interventions' would include distinctly spatial and plan led dimensions but would also extend beyond the spatial context and include a collaborative partnership response across public sector and with the private sector. Examples of 'interventions' include setting out and implementing investment priorities in roads infrastructure, water services and energy as examples; establishing enabling initiatives and programmes particularly in relation to regeneration and renewal of town centres and key economic development sites; proactive interventions to support enterprise development and use of enterprise lands; targeted approaches to secure Foreign Direct Investment and; delivering critical strategy development/research upon which further action will be identified.

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

- Achieve maximum benefit from investment in physical, social and economic infrastructure.
- Support the strengthening of settlements becoming the drivers for economic growth in the County.
- Support activity resulting in local employment opportunities.
- Enable opportunities arising from Brexit.
- Enable place-making through regeneration and renewal.
- Result in environmental benefits as development would be linked inextricably to ensuring the appropriate and adequate provision of hard infrastructure.
- Improve quality of life through positive place-making.
- Protect and support rural communities, and rural vitality and vibrancy subject to normal considerations.
- Contribute to population retention in areas showing decline.

Having regard to the foregoing, it is considered that this alternative would be the optimum option for the strategic direction of the Plan and it aligns with the vision for the development of the North West.

3.5 Assessment and Selection of Alternatives

Having regard to the principles of sustainable development and to the existing and emerging national and regional policy frameworks, Alternative 3, 'Effective Urban-Rural Development' 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 and where possible to innovate in the delivery of critical infrastructure so as to result in maximum 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. In addition, this approach is predicated on the significant capacity that exists throughout our entire County to participate in and contribute to growth and development. The particular strengths, opportunities and niche potential that exist within the different areas of the County are to be harnessed through this approach to produce benefits and meaningful change for all of Donegal's communities and consequently for the region. This approach recognises the strong inter-dependency between urban and rural areas in County Donegal by prioritising renewal and regeneration of towns as important service centres for wider rural hinterlands. It also ensures that rural communities are supported where genuine rural need and all other normal planning considerations can be satisfied.

Table 3.1: Assessment of Alternative Approaches to the Plan in the Context of the Strategic Environmental Objectives (SEO's)

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.
Business as usual	POP1; POP2; SL3; WR4; CM2; AC1; AC2; MA1; LD1	BIO1; BIO2; BIO4; HH1; SL1; WR5; CM1; CM3; MA2; CH1			BIO3; SL2; SL4; WR1; WR2; WR3	
Urban-centric model		BIO1; BIO2; BIO3; BIO4; WR5; CM1; CM3; MA2; CH1			SL1; SL2; SL4; WR1; WR2; WR3	POP1; POP2; HH1; SL3; WR4; CM2; AC1; AC2; MA1; LD1
Effective Urban-Rural Development		BIO1; BIO2; BIO3; BIO4; WR5; CM1; CM3; MA2; CH1			SL1; SL2; SL4; WR1; WR2; WR3	POP1; POP2; HH1; SL3; WR4; CM2; AC1; AC2; MA1; LD1

4 MITIGATION

4.1 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 lesson or offset those effects. Mitigation measures can be divided into those that:

- Avoid effects;
- Reduce 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 the objectives and policies contained within the plan from the outset. The finding of the SEA (AA and SFRA) has informed the process through:

- Consideration of alternatives;
- Integration of environment 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.

4.2 Mitigation through Assessment of Alternatives

A range of potential alternative development scenarios for the County Donegal 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 and evaluation informed the choice as to which alternative was to be adopted and an explanation of the choice was elaborated upon in the SEA Environmental Report(s).

4.3 Mitigation Integrated Into Settlement Framework Plans

The Plan includes a number of Settlement Framework Plans. Environmental considerations have been intergraded into the land use zoning objectives and extent of the settlement boundaries. Careful consideration in particular has been paid to the protection of Natura 2000 sites and flood risk through the SEA, AA and SFRA processes.

4.4 Incorporating Environmental Issues into the Plan

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 and the mitigation of potential effects.

The SEA process shaped the drafting of the entire Plan and Table 4.3 outlines how the environmental issues raised throughout the SEA process were incorporated into the Plan as objectives, policies or

otherwise. The table does not include all references within the Plan nor indicate amendments and modifications arrived at throughout the Plan drafting process as a result of the SEA process.

The baseline environmental data and indicators were considered at all times during the drafting of the objectives and policies of Part B of the Draft Plan and as detailed in Chapter 15 of Part C of Draft Plan for the 3 towns of Letterkenny, Buncrana and Bundoran, and in particular the location and conservation status of Natura 2000 sites, Freshwater Pearl Mussel, shellfish waters and the requirements of the relevant River Basin District Plan.

The County Development Plan 2012-2018 identified 59 settlement frameworks for individual settlements throughout the County and these were significantly informed by the SEA and AA processes carried out at that time; the Draft County Development Plan 2018-2024 contains these same 59 settlements that have no material changes from the previous Plan and therefore it is considered that no further environmental assessment is required as part of this process.

Part C: Objectives and Policies of the Towns, of the Draft Development Plan sets out zonings, objectives and policies for the 3 towns of Letterkenny, Buncrana and Bundoran which are specific to these settlements only. The SEA of Part C of the Draft Plan is an inclusive element of the wider Draft Development Plan and the zonings, objectives and policies of these individual towns have been informed by the SEA and AA process.

Strategic Environmental Objectives were drafted following the collation of the baseline data and are based on the particular environmental issues affecting County Donegal whilst also complying with the requirements of Schedule 2(B) of the Planning and Development Regulations 2001 (as amended), and the SEA Guidelines⁵, 2004. An assessment of each Strategic Objective, Objective and Policy of the Draft Plan was carried out to ascertain whether or not they could potentially impact on the Strategic Environmental Objectives (table 4.1 below) of the Environment Report, by testing them against the categories as set out in table 4.2 below:

Table 4.1: Strategic Environmental Objectives

Environmental Component	SEO code:	Strategic Environmental Objective
Biodiversity, Fauna and Flora	BIO1	Ensure compliance with the Habitats Directive by protecting all Natura 2000 sites and habitats of species (SACs and SPAs) within the County, including Freshwater Pearl Mussel catchment areas.
Biodiversity, Fauna and Flora	BIO2	Conserve and enhance the diversity of habitats and protected species and promote the sustainable management of these areas.
Biodiversity, Fauna and Flora	BIO3	Protect the marine environment, and promote integrated coastal zone management strategies
Biodiversity, Fauna and Flora	BIO4	Protect macro-corridors and contiguous areas of habitat.
Population	POP1	Facilitate a good quality of life based on high-quality residential, working and recreational environments
Population	POP2	Facilitate more sustainable travel patterns.

⁵ Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programme on the Environment - Guidelines for Regional Authorities and Planning Authorities (November, 2004).

Human Health	HH1	Minimise noise, vibration and emissions from traffic, industrial processes and extractive industry
Soil (Including Minerals)	SL1	Protect and maintain the quality of soils.
Soil (Including Minerals)	SL2	Protect and conserve geological sites.
Soil (Including Minerals)	SL3	Give preference to the re-use of brownfield lands, rather than developing greenfield lands.
Soil (Including Minerals)	SL4	Minimise the amount of waste to landfill
Water	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).
Water	WR2	Protect the quality of surface and drinking water quality as sources of drinking water, assets for amenity, and recreation and ecosystem purposes.
Water	WR3	Promote sustainable water use based on a long-term protection of available water resources
Water	WR4	Reduce progressively discharges of polluting substances to waters
Water	WR5	Manage the risk of coastal, estuarine and fluvial flooding. Manage the risk of droughts.
Coast/Marine Resource	CM1	Avoid coastal erosion and promote coastal protection. Manage the coastal zone as an environmental and tourist resource.
Coast/Marine Resource	CM2	Protect Designated Shellfish Waters.
Air/Climatic Factors	AC1	Support implementation of National Climate Strategy 2007-2012.
Air/Climatic Factors	AC2	Reduce all forms of air pollution
Air/Climatic Factors	AC3	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.
Material Assets	MA1	Maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources.
Material	MA2	Avoid flood risk and/or coastal erosion in selecting sites for development

Assets		
Cultural Heritage	CH1	Promote the protection and conservation of the cultural, including architectural and archaeological, heritage
Landscape	LD1	Conserve and enhance valued natural, historic and cultural landscapes and features within them and avoid adverse impacts.

Table 4.2: Categories for Assessment

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

This Assessment Process identified where/what, additions/deletions/amendments were required to mitigate against any potential negative impacts on the Strategic Environmental Objectives. The proposed additions/deletions/amendments, were considered during the drafting of the Plan and Table 4.3 below contains all additional objectives, policies and references contained within the Plan as informed through the SEA process.

Table 4.3: Changes to the Draft CDP resulting from the SEA

Environmental Issue	Additional Policy, Objective or Reference Required
Biodiversity, Flora and Fauna	
Impact of development works	<p>ED-P-14: Paragraph (n) amended to read: 'it does not compromise water quality nor conflict with the objectives and programme of measures contained within the relevant River Basin Management Plan'.</p> <p>WES-O-11: Text added to objective: 'while ensuring compliance with Article 6 of the Habitats Directive'.</p> <p>TC-O-1: Text added: 'and compliance with Article 6 of the Habitats Directive'.</p> <p>UB-P-14: Text added: 'including compliance with Article 6 of the Habitats Directive'.</p> <p>UB-P-15: Text added: 'including compliance with Article 6 of the Habitats Directive'.</p> <p>RH-O-6: Bullet 3 text amended to read: 'the relevant River Basin Management Plan'.</p>

	<p>RH-P-1: Text amended to read: 'the relevant River Basin Management Plan'.</p> <p>NH-O-6: Minor text change to 'Shellfish Pollution Reduction Programme'.</p> <p>NH-P-20: New Policy Added: 'It is the policy of the Council to ensure the protection of Cró na mBraonáin habitats and Grouse sanctuary given its high concentration of Red Grouse and its importance to the national Red Grouse population, which is a protected species under the EU Birds Directive'.</p> <p>EX-P-2: Policy amended to read: ' or in areas of High Scenic Amenity', and 'proposals will not normally be permitted where they could adversely impact upon any Natura 2000 site'.</p> <p>E-P-18: Text amended to include hydrology assessment: 'impacts on archaeological monuments, hydrology and watercourses'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p> <p>MRCM-O-2: Text of first bullet amended to read: 'Protecting the ecological integrity, qualifying habitats and species of Natura 2000 sites through Appropriate Assessment of development proposals'.</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p> <p>LK-ED-P-1: Text of policy amended to include: 'and comply with Article 6 of the Habitats Directive'.</p> <p>LK-ED-P-5: Text of policy amended to reflect riverside location and possible proximity of developments to SPA by addition of: 'and comply with Article 6 of the Habitats Directive'.</p> <p>LK-OPP-P-4: Text in policy amended to read: 'Subject to the environmental and amenity considerations related to the</p>
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	<p>above, including compliance with Article 6 of the Habitats Directive'.</p> <p>LK-OPP-P-5: Text in paragraph (c) amended by addition of: 'and complies with Article 6 of the Habitats Directive'.</p> <p>BC-ED-P-8: Text in policy amended by addition of: 'and must comply with Article 6 of the Habitats Directive'.</p> <p>BC-H-P-1: Text amended by addition of: 'and must comply with the requirements of Article 6 of the Habitats Directive'.</p> <p>BC-H-P-4: Text amended by addition of: 'and must comply with the requirements of Article 6 of the Habitats Directive'.</p> <p>BD-H-P-1: Text of policy amended by addition of: 'and must comply with the requirements of Article 6 of the Habitats Directive'.</p> <p>BD-H-P-3: Text of policy amended by addition of: 'including compliance with the requirements of Article 6 of the Habitats Directive'.</p> <p>BD-TO-P-1: Text of the policy is amended by addition of: 'in particular policy NH-P-1 of this Plan'.</p>
<p>Protection of watercourses and sensitive water bodies</p>	<p>WES-O-5: Text added to objective: 'and to protect Natura 2000 sites in accordance with Article 6 of the Habitats Directive'.</p> <p>WES-O-6: Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes'.</p> <p>WES-O-6: Text added to second bullet of objective: 'against soil contamination and loss'.</p> <p>WES-O-6: Text added to third bullet of objective: 'and light pollution'.</p> <p>RH-O-6: Bullet 3 text amended to read: 'the relevant River Basin Management Plan'.</p> <p>E-P-18: Text amended to include hydrology assessment: 'impacts on archaeological monuments, hydrology and watercourses'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on</p>

	<p>the environment when considered in conjunction with other existing and permitted developments in the area.'</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p> <p>MRCM-O-2: Text of first bullet amended to read: 'Protecting the ecological integrity, qualifying habitats and species of Natura 2000 sites through Appropriate Assessment of development proposals'.</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p>
Control of invasive species	No additional policies, objectives or reference required as sufficient mitigation exists throughout the Draft CDP.
Protection of Natura 2000 sites including certain sites within counties Sligo and Leitrim and Northern Ireland	<p>ED-P-8: Natura 2000 network added to policy statement: 'and the protection of areas designated as being of Especially High Scenic Amenity (EHSA) and the Natura 2000 network'</p> <p>ED-P-14: Paragraph (n) amended to read: 'it does not compromise water quality nor conflict with the objectives and programme of measures contained within the relevant River Basin Management Plan'.</p> <p>WES-O-11: Text added to objective: 'while ensuring compliance with Article 6 of the Habitats Directive'.</p> <p>TC-O-1: Text added: 'and compliance with Article 6 of the Habitats Directive'.</p> <p>UB-P-14: Text added: 'including compliance with Article 6 of the Habitats Directive'.</p> <p>UB-P-15: Text added: 'including compliance with Article 6 of the Habitats Directive'.</p> <p>RH-P-1: Text amended to read: 'the relevant River Basin Management Plan'.</p> <p>NH-P-20: New Policy Added: 'It is the policy of the Council to ensure the protection of Cró na mBraonáin habitats and Grouse sanctuary given its high concentration of Red Grouse and its importance to the national Red Grouse population, which is a protected</p>

	<p>species under the EU Birds Directive’.</p> <p>EX-P-2: Policy amended to read: ‘or in areas of High Scenic Amenity’, and ‘proposals will not normally be permitted where they could adversely impact upon any Natura 2000 site’.</p> <p>MRCM-O-2: Text of first bullet amended to read: ‘Protecting the ecological integrity, qualifying habitats and species of Natura 2000 sites through Appropriate Assessment of development proposals’.</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: ‘It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive’.</p> <p>LK-ED-P-1: Text of policy amended to include: ‘and comply with Article 6 of the Habitats Directive’.</p> <p>LK-ED-P-5: Text of policy amended to reflect riverside location and possible proximity of developments to SPA by addition of: ‘and comply with Article 6 of the Habitats Directive’.</p> <p>LK-OPP-P-4: Text in policy amended to read: ‘Subject to the environmental and amenity considerations related to the above, including compliance with Article 6 of the Habitats Directive’.</p> <p>LK-OPP-P-5: Text in paragraph (c) amended by addition of: ‘and complies with Article 6 of the Habitats Directive’.</p> <p>BC-ED-P-8: Text in policy amended by addition of: ‘and must comply with Article 6 of the Habitats Directive’.</p> <p>BC-H-P-1: Text amended by addition of: ‘and must comply with the requirements of Article 6 of the Habitats Directive’.</p> <p>BC-H-P-4: Text amended by addition of: ‘and must comply with the requirements of Article 6 of the Habitats Directive’.</p> <p>BD-H-P-1: Text of policy amended by addition of: ‘and must comply with the requirements of Article 6 of the Habitats Directive’.</p> <p>BD-H-P-3: Text of policy amended by addition of: ‘including compliance with the requirements of Article 6 of the Habitats Directive’.</p>
<p>Protection of Annex II species such as Freshwater</p>	<p>WES-O-5: Text added to objective: ‘and to protect Natura 2000 sites in accordance with Article 6 of the Habitats</p>

Pearl Mussel and salmon	<p>Directive'.</p> <p>WES-O-6: Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes'.</p> <p>WES-O-6: Text added to second bullet of objective: 'against soil contamination and loss'.</p> <p>WES-O-6: Text added to third bullet of objective: 'and light pollution'.</p> <p>EX-P-2: Policy amended to read: ' or in areas of High Scenic Amenity', and 'proposals will not normally be permitted where they could adversely impact upon any Natura 2000 site'.</p>
Ramsar Sites and Statutory Nature Reserves	<p>No additional policies, objectives or reference required as sufficient mitigation exists throughout the Draft CDP.</p>
Ecological Networks	<p>WES-O-6: Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes'.</p> <p>WES-O-6: Text added to second bullet of objective: 'against soil contamination and loss'.</p> <p>WES-O-6: Text added to third bullet of objective: 'and light pollution'.</p> <p>RH-O-6: Bullet 3 text amended to read: 'the relevant River Basin Management Plan'.</p> <p>E-P-18: Text amended to include hydrology assessment: 'impacts on archaeological monuments, hydrology and watercourses'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p> <p>E-P-21: New Policy Added: 'It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required.'</p>

	<p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p> <p>MRCM-O-2: Text of first bullet amended to read: 'Protecting the ecological integrity, qualifying habitats and species of Natura 2000 sites through Appropriate Assessment of development proposals'.</p>
<p>Shellfish waters</p>	<p>WES-O-6: Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes'.</p> <p>WES-O-6: Text added to second bullet of objective: 'against soil contamination and loss'.</p> <p>WES-O-6: Text added to third bullet of objective: 'and light pollution'.</p> <p>NH-O-6: Minor text change to 'Shellfish Pollution Reduction Programme'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p>
<p>Population and Human Health</p>	
<p>Quality of Life</p>	<p>T-P-1: Text amended from 'environmental habitats' to 'environmental heritage' WES-O-5: Text added to objective: 'and to protect Natura 2000 sites in accordance with Article 6 of the Habitats Directive'.</p> <p>WES-P-11: Text amended to read: 'to specify EPA Code of Practice', and 'the Planning Authority shall be furnished with written evidence / certification, confirming that the septic tank / wastewater treatment system has been installed in accordance with the terms and conditions of the grant of planning permission.'</p> <p>TC-O-1: Text added: 'and compliance with Article 6 of the Habitats Directive'.</p> <p>RH-P-1: Text amended to read: 'the relevant River Basin Management Plan'.</p> <p>EX-P-2: Policy amended to read: ' or in areas of High Scenic Amenity', and</p>

	<p>'proposals will not normally be permitted where they could adversely impact upon any Natura 2000 site'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p> <p>LK-OPP-P-4: Text in policy amended to read: 'Subject to the environmental and amenity considerations related to the above, including compliance with Article 6 of the Habitats Directive'.</p> <p>LK-OPP-P-5: Text in paragraph (c) amended by addition of: 'and complies with Article 6 of the Habitats Directive'.</p> <p>BC-ED-P-8: Text in policy amended by addition of: 'and must comply with Article 6 of the Habitats Directive'.</p> <p>BD-TO-P-1: Text of the policy is amended by addition of: 'in particular policy NH-P-1 of this Plan'.</p>
<p>Population trends, distribution of RPGs</p> <p>Population targets and Settlement Frameworks</p>	<p>UB-P-14: Text added: 'including compliance with Article 6 of the Habitats Directive'.</p> <p>UB-P-15: Text added: 'including compliance with Article 6 of the Habitats Directive'.</p> <p>BC-H-P-1: Text amended by addition of: 'and must comply with the requirements of Article 6 of the Habitats Directive'.</p>
<p>Health and its relationship to environmental issues</p>	<p>WES-P-3: Text added to policy: 'and to manage development so that it is permitted only where adequate wastewater treatment capacity exists, or will become available, within the life of a planning permission'.</p> <p>WES-P-11: Text amended to read: 'to specify EPA Code of Practice', and 'the Planning Authority shall be furnished with written evidence / certification,</p>

	<p>confirming that the septic tank / wastewater treatment system has been installed in accordance with the terms and conditions of the grant of planning permission.'</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p>
<p>Provision of infrastructure and community facilities</p>	<p>T-P-1: Text amended from 'environmental habitats' to 'environmental heritage'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p> <p>E-P-21: New Policy Added: 'It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required.'</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p> <p>LK-OPP-P-4: Text in policy amended to read: 'Subject to the environmental and amenity considerations related to the above, including compliance with Article 6 of the Habitats Directive'.</p> <p>LK-OPP-P-5: Text in paragraph (c) amended by addition of: 'and complies with Article 6 of the Habitats Directive'.</p>
<p>Flooding</p>	<p>RH-P-1: Text amended to read: 'the relevant River Basin Management Plan'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p>

	<p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p> <p>LK-OPP-P-4: Text in policy amended to read: 'Subject to the environmental and amenity considerations related to the above, including compliance with Article 6 of the Habitats Directive'.</p> <p>LK-OPP-P-5: Text in paragraph (c) amended by addition of: 'and complies with Article 6 of the Habitats Directive'.</p>
<p>Water</p>	
<p>Impact of development works on water quality</p>	<p>WES-O-5: Text added to objective: 'and to protect Natura 2000 sites in accordance with Article 6 of the Habitats Directive'.</p> <p>WES-O-6: Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes'.</p> <p>WES-O-6: Text added to second bullet of objective: 'against soil contamination and loss'.</p> <p>WES-O-6: Text added to third bullet of objective: 'and light pollution'.</p> <p>WES-P-11: Text amended to read: 'to specify EPA Code of Practice', and 'the Planning Authority shall be furnished with written evidence / certification, confirming that the septic tank / wastewater treatment system has been installed in accordance with the terms and conditions of the grant of planning permission.'</p> <p>NH-O-6: Minor text change to 'Shellfish Pollution Reduction Programme'.</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental</p>

	<p>considerations including the Habitats Directive.'</p> <p>MRCM-O-2: Text of first bullet amended to read: 'Protecting the ecological integrity, qualifying habitats and species of Natura 2000 sites through Appropriate Assessment of development proposals'.</p>
Alignment with objectives and policies of the Relevant River Basin Management Plan	<p>ED-P-14: Paragraph (n) amended to read: 'it does not compromise water quality nor conflict with the objectives and programme of measures contained within the relevant River Basin Management Plan'.</p> <p>WES-O-5: Text added to objective: 'and to protect Natura 2000 sites in accordance with Article 6 of the Habitats Directive'.</p> <p>WES-O-6: Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes'.</p> <p>WES-O-6: Text added to second bullet of objective: 'against soil contamination and loss'.</p> <p>WES-O-6: Text added to third bullet of objective: 'and light pollution'.</p> <p>WES-P-11: Text amended to read: 'to specify EPA Code of Practice', and 'the Planning Authority shall be furnished with written evidence / certification, confirming that the septic tank / wastewater treatment system has been installed in accordance with the terms and conditions of the grant of planning permission.'</p> <p>RH-O-6: Bullet 3 text amended to read: 'the relevant River Basin Management Plan'.</p> <p>RH-P-1: Text amended to read: 'the relevant River Basin Management Plan'.</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p> <p>MRCM-O-2: Text of first bullet amended to read: 'Protecting the ecological integrity, qualifying habitats and species of Natura 2000 sites through Appropriate Assessment of development proposals'.</p>
Wastewater, drinking water and bathing water quality	<p>WES-P-3: Text added to policy: 'and to manage development so that it is permitted only where adequate</p>

	<p>wastewater treatment capacity exists, or will become available, within the life of a planning permission'.</p> <p>WES-P-11: Text amended to read: 'to specify EPA Code of Practice', and</p> <p>'the Planning Authority shall be furnished with written evidence / certification, confirming that the septic tank / wastewater treatment system has been installed in accordance with the terms and conditions of the grant of planning permission.'</p> <p>RH-P-1: Text amended to read: 'the relevant River Basin Management Plan'.</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p>
Air and Climate Change	
Climate change and air quality	<p>WES-O-6: Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes'.</p> <p>WES-O-6: Text added to second bullet of objective: 'against soil contamination and loss'.</p> <p>WES-O-6: Text added to third bullet of objective: 'and light pollution'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p>
Limiting greenhouse gas emissions and reducing dependency on fossil fuels	<p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p>
Cultural Heritage	
Impact of development works (e.g. infrastructural works,	ED-P-14: Paragraph (n) amended to read:

forestry)	<p>'it does not compromise water quality nor conflict with the objectives and programme of measures contained within the relevant River Basin Management Plan'.</p> <p>E-P-18: Text amended to include hydrology assessment: 'impacts on archaeological monuments, hydrology and watercourses'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p> <p>E-P-21: New Policy Added: 'It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required.'</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p>
Identification and protection of geological sites	<p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p>
Protection of architectural and archaeological structures and sites	<p>E-P-18: Text amended to include hydrology assessment: 'impacts on archaeological monuments, hydrology and watercourses'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p>
Landscape	
Impact of development works (e.g. infrastructural works, forestry)	<p>ED-P-14: Paragraph (n) amended to read: 'it does not compromise water quality nor conflict with the objectives and programme of measures contained within the relevant River Basin Management Plan'.</p> <p>RH-P-1: Text amended to read: 'the relevant River Basin Management Plan'.</p>

	<p>NH-P-20: New Policy Added: 'It is the policy of the Council to ensure the protection of Cró na mBraonáin habitats and Grouse sanctuary given its high concentration of Red Grouse and its importance to the national Red Grouse population, which is a protected species under the EU Birds Directive'.</p> <p>EX-P-2: Policy amended to read: ' or in areas of High Scenic Amenity', and 'proposals will not normally be permitted where they could adversely impact upon any Natura 2000 site'.</p> <p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p> <p>E-P-21: New Policy Added: 'It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required.'</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p>
<p>Identification, classification and protection of landscape</p>	<p>NH-P-20: New Policy Added: 'It is the policy of the Council to ensure the protection of Cró na mBraonáin habitats and Grouse sanctuary given its high concentration of Red Grouse and its importance to the national Red Grouse population, which is a protected species under the EU Birds Directive'.</p>
<p>Other Issues</p>	
<p>Rural Housing</p>	<p>WES-P-11: Text amended to read: 'to specify EPA Code of Practice', and 'the Planning Authority shall be furnished with written evidence / certification, confirming that the septic tank / wastewater treatment system has been installed in accordance with the terms and conditions of the grant of planning permission.'</p> <p>RH-O-6: Bullet 3 text amended to read: 'the relevant River Basin Management Plan'.</p> <p>RH-P-1: Text amended to read: 'the relevant River Basin Management Plan'.</p>
<p>Development of recreation and tourism facilities</p>	<p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and</p>

	<p>permitted developments in the area.'</p> <p>E-P-21: New Policy Added: 'It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required.'</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p> <p>CCG-P-4: Text in Paragraph (k) amended to read: 'It does not compromise the objectives of the relevant River Basin Management Plan prepared in accordance with the Water Framework Directive'.</p> <p>LK-ED-P-5: Text of policy amended to reflect riverside location and possible proximity of developments to SPA by addition of: 'and comply with Article 6 of the Habitats Directive'.</p> <p>LK-OPP-P-4: Text in policy amended to read: 'Subject to the environmental and amenity considerations related to the above, including compliance with Article 6 of the Habitats Directive'.</p> <p>LK-OPP-P-5: Text in paragraph (c) amended by addition of: 'and complies with Article 6 of the Habitats Directive'.</p>
<p>Coastal Management</p>	<p>WES-O-6: Text added to first bullet of objective: 'Freshwater Pearl Mussel Sub-basin Management Plans, Shellfish Pollution Reduction Programmes'.</p> <p>WES-O-6: Text added to second bullet of objective: 'against soil contamination and loss'.</p> <p>WES-O-6: Text added to third bullet of objective: 'and light pollution'.</p> <p>WES-P-3: Text added to policy: 'and to manage development so that it is permitted only where adequate wastewater treatment capacity exists, or will become available, within the life of a planning permission'.</p> <p>WES-P-11: Text amended to read: 'to specify EPA Code of Practice', and 'the Planning Authority shall be furnished with written evidence / certification, confirming that the septic tank / wastewater treatment system has been installed in accordance with the terms and conditions of the grant of planning</p>

	<p>permission.'</p> <p>MRCM-O-2: Text of first bullet amended to read: 'Protecting the ecological integrity, qualifying habitats and species of Natura 2000 sites through Appropriate Assessment of development proposals'.</p> <p>LK-OPP-P-4: Text in policy amended to read: 'Subject to the environmental and amenity considerations related to the above, including compliance with Article 6 of the Habitats Directive'.</p> <p>LK-OPP-P-5: Text in paragraph (c) amended by addition of: 'and complies with Article 6 of the Habitats Directive'.</p> <p>BC-ED-P-8: Text in policy amended by addition of: 'and must comply with Article 6 of the Habitats Directive'.</p>
Waste Management	No additional policies, objectives or reference required as sufficient mitigation exists throughout the Draft CDP.
Soils	<p>E-P-20: New Policy Added: 'It is the policy of the Council that all proposals for renewable energy development will have regard to the cumulative effect of the development on the environment when considered in conjunction with other existing and permitted developments in the area.'</p> <p>E-P-21: New Policy Added: 'It is the policy of the Council that all applications for renewable energy projects will ensure that details of the proposed grid connection and all associated infrastructure are considered in the Environmental Impact Statement (EIS) and Natura Impact Statement as may be required.'</p> <p>TOU-O-17: New Objective Added: 'To support the development of tourism and recreational activities that will harness the potential of the riverine assets in County Donegal and in the region including the Rivers Finn and Foyle subject to environmental considerations including the Habitats Directive.'</p>
Employment and Enterprise Developments	No additional policies, objectives or reference required as sufficient mitigation exists throughout the Draft CDP.

5 MONITORING

5.1 Monitoring, Environmental Objectives, Indicators and Targets

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section and Section 9 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.

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.

5.2 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.

5.3 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 8.2 of the Environmental Report and presented in Table 5.1 below and the thresholds at which corrective action will be considered are identified under the heading "Targets".

The significant environmental effects of the implementation of the County Donegal Development Plan 2012-2018 as set against the SEA monitoring framework was carried out during the period of the Plan and the following summary assessment in Table 5.2 sets out the performance of the constituent indicator and associated target.

Table 5.1: Environmental Monitoring of the County Donegal Development Plan 2012-2018

Target	Baseline	Assessment	Indicators driving target	Assessment over Plan Period
100% of all Water bodies to achieve good or higher status	64% (2009)	56% (2015)	No of planning applications granted across of a range of environmental designations	667 (July 2012 – March 2016)
			No of new buildings falling within a range of environmental designations	240 (July 2012 – March 2016)
			% of bathing water bodies achieving overall quality rating of 'excellent'	86% (2012-2015)
			% of shellfish waters achieving 'Class A' classification	20% (2015/16) or 12% reduction over plan period
			Total population affected by serious deficiencies in public water supplies	49,053 (2016) or 2% decrease over plan period
			% of wastewater treatment plants that are non compliant	63% non compliant (2015) or 17% decrease over plan period
			Aggregate Wastewater Load (PE) as a % of total Treatment Plant Design Capacity (PE)	230% (2015) 13% decrease over plan period
Reduce Unaccounted for Water (UFW) to 38%	40% (2012)	41% (2015)	TBC	TBC
% of Small Area's (SA's) falling into Disadvantaged or Very Disadvantaged Bands in line with the State	31% in Donegal (2011) 15% in State (2011)	Data not yet available (2016)	Population change by Tier	Data yet available for 2016
			Difference in new dwellings built in each tier compared to core strategy target	Tier 1 Shortfall 483
				Tier 2 Shortfall 323
				Tier 3 Shortfall 179
				Tier 4 Shortfall 33
				Tier 5 Excess 1048
Vacancy and Dereliction	8641 vacant or derelict buildings 2016 Increase of 304			

Target	Baseline	Assessment	Indicators driving target	Assessment over Plan Period
% of Persons Reporting with 'Good' or 'Very Good' Health in line with the State	90% in Donegal (2011) 88% in State (2011)	Data not yet available for 2016	% of the population travelling to work by green methods of transport (by foot or bicycle)	Data yet available for 2016
			% of the children 18 years and younger travelling to school by green methods of transport (by foot or bicycle)	Data yet available for 2016
			% of the children 19 years and over travelling to school or college by green methods of transport (by foot or bicycle)	Data yet available for 2016
			% of cars falling into Emission Band (A)	42% Increase of 7, 358 cars or 13%
			% of geographical areas within the county that are classed as unpolluted or litter free	5% (2015) 6% decrease
100% Maintenance of Soil Composition Types by Area in County	Baseline on soil composition types available for 2007 - 2013	Data on soil composition types not available until 2021	No. of Irish Geological Heritage Sites in County Donegal	Constant 114 (2012) & 114(2016)
			Tonnes of household waste sent for recycling (kerbside & bring banks)	11,311 tonnes (2012)
			Tonnes of household waste sent to landfill	10,181 (2012)
Maintain existing number of Beach & Coastal Awards	40 (2012)	38 (2016)	No of Designated Beaches	19 (2012) 19 (2016)
			No. of Green Coast Awards	7 (2012) 6 (2016)
			No. of Blue Flag Beaches	14 (2012) 13 (2016)
Maintain 'Good' Air Quality Status in Zones C & D	Good (2012)	Good (2016)	No. of Cattle in County Donegal	3% decrease in Cattle Numbers 191,000 (2012) 186,000 (2015)
			Total kW of Electricity produced from Windfarms in County	6% increase 281,630 (2011) 298,730 (2015)
			% of Households with Green Fuels	1.5% Households (2011)

Target	Baseline	Assessment	Indicators driving target	Assessment over Plan Period
% of Households with connections to services in line with or better than the State	Special Tabulation to be requested from CSO prior to adoption of the Plan.	TBC	% of Households with Public Water Connection	77% Donegal & 76% State (2011)
			% of Households with Waste Water Treatment Plan Connection	40% Donegal & 66% State (2011)
			% of Households with Internet Connection	65% Donegal & 74% State (2011)
			% of Households with PC Access	66% Donegal & 73% State (2011)
			% of Community Groups within 5 km radius of Community Facilities	88% Donegal (2015)
No change to or a decrease in area (ha) prone to flood risk by storm frequency	60 sq km within coastal flood zone (1/200 year flood) in 2016	TBC	No of planning applications granted in coastal flood zones 1/200 year	87 granted over plan period
			No of planning applications refused in coastal flood zones 1/200 year	7 refused over plan period
Increase Record of Protected Structures (RPS) to 100% of National Inventory of Architectural Heritage (NIAH) Maintain 100% of existing archaeological heritage	2,677 (as set for Donegal in the National Inventory of Architectural Heritage, 2016) 3,129 (as set for Donegal in the Sites & Monuments Record , 2016)	Currently stands at 14% Currently at 100%	% of NIAH structures on the RPS (as protected by DCC, as identified in NIAH in Donegal)	14% or 377 protected structures (2016)
			No. of archaeological sites and monuments on Sites and Monuments Record (SMR) in Donegal	No change from 2012 – 2016 (3,129)
Protect & conserve the unique landscape of Donegal	Develop & adopt LCA Implement LCA within Donegal CDP 2012 - 2018 Prohibit inappropriate development within EHSAs	Done Not achieved 5	Adopt 1 LCA	A comprehensive LCA was developed and adopted (2016)
			Implement 1 LCA	Not implemented during plan period
			No's of developments granted planning permission considered inappropriate in EHSA's.	5

The following measures have been set out as part of the SEA to monitor the significant environmental effects of the implementation of the plan and any gaps identified in the Environmental Report to help identify issues that need addressing or arise during the lifetime of the Plan. Monitoring shall be based on the environmental objectives, targets and indicators set out below.

Table 5.2: 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 and within a surrounding 15km buffer including cross border linkages, or a wider zone of influence where potential impact is considered possible, including Freshwater Pearl Mussel catchment areas.	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 within the County and within a surrounding 15km buffer including cross border linkages, or a wider zone of influence where potential impact is considered possible.	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 relevant River Basin Management Plan (RBMP)
BIO3: Protect the marine environment within the County and within a surrounding 15km buffer including cross border linkages, or a wider zone of influence where potential impact is considered possible, 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 within the County and within a surrounding 15km buffer including cross border linkages, or a wider zone of influence where potential impact is considered possible.	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 the number of geological heritage sites in the County and take all steps necessary to enhance and promote these sites.
SL3: Give preference to the re-use of brownfield lands, rather than developing greenfield lands.	Location and area of brownfield sites developed and permitted for development over the plan period.	Develop as many brownfield sites as appropriate and possible.
SL4: 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
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 relevant River Basin Management Plan	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 	Protect and restore areas identified in the relevant RBMP and achieve 'good' status in accordance with the relevant RBMP objectives.
WR2: Protect the quality of surface and drinking water quality as sources of drinking water, assets for amenity, and recreation and ecosystem purposes.	Water quality monitoring results by the EPA and County Lab, for: <ul style="list-style-type: none"> Bathing Water Quality Groundwater Quality Drinking Water quality. Number of Public Water Supplies on EPA remedial Action list. EPA data under 'Urban Wastewater Discharges in Ireland population Equivalents	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.

	<p>greater than 500 persons report for 2010-2011.</p> <p>Agglomerations over 500 in the County without Secondary Treatment.</p> <p>Proportion of discharge licenses granted by the EPA that are compliant.</p>	
WR3: Promote sustainable water use based on a long-term protection of available water resources.	Water meter readings.	Improve Water Conservation
WR4: Reduce progressively discharges of polluting substances to waters	<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>Protect and restore areas identified in the relevant RBMP and achieve 'good' status in accordance with the relevant RBMP 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>
<p>WR5: Manage the risk of coastal, estuarine and fluvial flooding.</p> <p>Manage the risk of droughts.</p>	Number of housing developments permitted on flood plains or lands likely to flood.	<p>Improved flood risk management in areas prone to flooding.</p> <p>Reduction in incidents of flood damage to properties.</p>

COAST/Marine Resource

Environmental Objectives	Indicators	Targets
<p>CM1: Avoid coastal erosion and promote coastal protection.</p> <p>CM2: Protect Designated Shellfish Waters.</p>		Conserve and enhance the coastal resource as an environment, amenity and resource.

Air/Climatic Factors

Environmental Objectives	Indicators	Targets
<p>AC1: Support implementation of National Climate Strategy 2007-2012.</p> <p>AC2: Reduce all forms of air pollution.</p>	<p>National level of carbon emissions.</p> <p>Local Air quality monitoring results.</p>	<p>20% reduction in greenhouse gas emissions from 1990 levels by 2020.</p> <p>Full delivery of Climate Change strategies and Preparation of County Climate Change Strategies.</p>

<p>AC3: Promote and support a shift from fossil fuel dependent energy to more sustainable energy.</p> <p>Promote and support a shift from fossil fuel dependant vehicles to more sustainable modes of travel.</p>	<p>I-Plan results of numbers of developments permitted with renewable energies.</p> <p>Average daily motor vehicle flows.</p> <p>Proportion of travel by mode.</p> <p>Investment in public transport.</p>	<p>Reduce road traffic in line with Smarter Travel, A Sustainable Transport Future.</p> <p>Increased investment in cycle paths and footpaths.</p> <p>Consider recommendations of OREDP in Off shore wind energy developments.</p>
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Material Assets

Environmental Objectives	Indicators	Targets
<p>MA1: Maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources.</p>	<p>Availability and quality of community related infrastructure, services and facilities and status of environmental resources.</p>	
<p>MA2: Avoid flood risk and/or coastal erosion in selecting sites for development</p>	<p>Number of community related developments on vulnerable coastal sites/sites prone to flooding.</p>	<p>Improved flood risk management in areas prone to flooding.</p> <p>Reduction in incidents of flood damage to premises.</p>

Cultural Heritage

Environmental Objectives	Indicators	Targets
<p>CH1: Promote the protection and conservation of the cultural, including architectural and archaeological, heritage</p>	<p>Number of structures on RPS in relation to Ministerial Recommendations arising from NIAH County inventory.</p> <p>Number of ACAs</p> <p>Number of Monuments on the RMP and areas of 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, historic and cultural 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>

