

LETTERKENNY & ENVIRONS DEVELOPMENT PLAN 2009-2015



VOLUME 3

ENVIRONMENTAL REPORT

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1.0 Non Technical Summary

1.1 Introduction

This section outlines the non- technical summary of this environmental report.

1.2 Context

The Planning & Development (Strategic Environmental Assessment) Regulations 2004 (S.I. no 436 of 2004) gave effect to the SEA Directive 2001 (2001/42/EC) so as to integrate SEA into current plan making procedures. The integration of SEA procedures into the plan process results in the systematic evaluation of the likely significant impacts on the environment of implementing a plan or programme.

Letterkenny Town Council and Donegal County Council in their joint responsibility for the review of the Letterkenny & Environs Development Plan 2003-2009 (as varied) and preparation of a new development plan, have also carried out a Strategic Environmental Assessment in tandem with the preparation of the plan as the population of the plan area is greater than 10,000 persons.

The environmental report outlined on the following pages sets out the sequential assessment of the strategic objectives and policies of the plan.

1.3 Methodology

The methodology utilised consisted of a number of sequential steps summarised as follows:

- a. Consideration of relevant plans and programmes at regional, national and international level.
- b. Collation of baseline information.
- c. Establishment of environmental protection objectives.

- d. Consideration of alternatives.
- e. Assessments of plan aim, strategic objectives, plan objectives and policies.
- f. Identification of mitigation measures.
- g. Identification of monitoring programme.

1.4 Collation of baseline data on the current state of the environment.

Baseline data was collated using a number of sources namely:

- Census of Population, Central Statistics Office
- Background Population Paper, central Planning Unit, February 2008.
- Donegal County Council, Water, Environment & Emergency Services.
- Donegal County Council, Geographic Information Systems.
- EPA website
- EPA bathing water publication (annual)
- NWIRBD website (Interactive Reporting Tool)
- EPA, Assessment Report on Air Monitoring in Letterkenny.
- EPA 'Environment in Focus 2006, Environmental Indicators for Ireland.'

In order to inform the collation of baseline data on the current state of the environment, an additional study in relation to biodiversity within the plan area was commissioned. The study was carried out by Glás Enviros Teo, Environmental Consultancy.

1.5 Consideration of alternatives

Three strategic alternatives were considered, namely:

- a. Continuation of existing policy framework.
- b. Planning for neighbourhoods.
- c. Sustainable development of the Gateway.

As a result of the assessment, strategic alternative c) 'Sustainable development of the Gateway', was identified as the preferred growth strategy.

1.6 Assessment

Population:

The population of the plan area in 2006 is 19,363 persons representing a high percentage of growth since 2002 at a rate of 21.6%. In particular there is a higher than average in migration level. The population is projected to grow to between 37,000 - 39,000 by 2020. As a result the plan makes adequate provision of housing land to meet this need. The plan places an emphasis on the requirement to ensure quality in all aspects of new growth in the plan area so as to provide an environment for integrated sustainable neighbourhoods, which will have knock on improvements in relation to quality of life. It is noted that a significant area of land is zoned for the purposes of residential development in the environs of the plan area. Having regard to the location of this land, it is noted that there will be negative impacts in relation to human health (accessibility), landscape, biodiversity.

Biodiversity:

There is a high level of biodiversity throughout the plan area and in particular there are three special areas for consideration at (1) Ballymacool Woods, Whinney Hill, Rodgers Burn, Drum Hill (2) Kilty Woods and (3) River Swilly. In addition there are 4 European protected sites within the plan area. The planning framework aims to give the highest level of protection to the European protected sites and to the special biodiversity areas. It is noted that special area at Rodgers Burn is identified both as 'recreation and open space' and for 'residential development' and will require careful assessment in the first instance through the roll out of design briefs as the plan may result in significant negative impacts in terms of landscape in the event that quality layout and design is not achieved.

Geology Soil:

The underlying geology of the area comprises 3 rock types as follows: Termon Formation (Schist), Lower Crana Quartzite and Dungiven Limestone. Soil types are shallow to moderate depth peaty podzols and established podzolic types with a moderate percentage of loam and sandy clays. The plan will not have significant effects on geology/soil.

Air/noise and climate:

Air quality monitoring carried out by EPA in Letterkenny has indicated that air quality level in Letterkenny at present is very good. Having regard to the extensive area of the plan and therefore the associated dependency on the private car, it is possible that these will be negative affects in relation to biodiversity. To counter this, the plan therefore aims to ensure the integrate of neighbourhood level facilities so as to encourage walking and cycling.

Water:

The plan area lies within the River Swilly catchment draining to Lough Swilly and the plan area is located in part on the natural flood plain. River water quality data generally shows an unpolluted indicator. Water supply capacity is restricted within the plan area and is being addressed through a number of schemes including the significant Letterkenny/Lough Mourne Scheme. Letterkenny is served by the Letterkenny Sewage Treatment Works which is of insufficient capacity. The scheme to upgrade the Waste Water Treatment Work's (WWTW's) is planned to commence construction in 2009. In the event that construction is delayed the implementation of the plan will have negative affects on estuary water quality due to deficiencies in WWTW's to accommodated the scale of growth provided for in the plan.

Material assets and cultural heritage:

There are 18 Recorded Monuments within the plan area and 19 buildings on the Record of Protected Structures. The plan sets out a clear framework to protect these features in a balanced manner so as to have significant likely positive effects on material assets and cultural heritage.

Landscape:

The plan area consists of a substantial amount of undeveloped lands that contribute to the landscape setting of the town. The plan aim is to promote a balance between landscape and the development of a Gateway City by guiding development in a manner so as to respond to context, topography and setting and to deliver quality, therein mitigating against negative impacts.

2.0 Introduction

This document forms part of the Letterkenny Environs Development Plan 2009-2015 and fulfils the Councils responsibilities in relation to the preparation of a Strategic Environmental Assessment (herein described as SEA) in accordance with the Planning & Development (Strategic Environmental Assessment) Regulations 2004.

2.1 Purpose

The purpose of the process of Strategic Environmental Assessment is to carry out a systematic evaluation of the likely significant impacts on the environment of implementing a plan or programme. The process involves the preparation of an Environmental Report to identify and evaluate the likely significant environmental effects of the plan/programme, to consult the public and the environmental authorities in relation to the Environmental Report, to take account of the findings of the report in deciding whether to adopt or modify the plan and to make the decision on adoption of the plan and to set out how SEA influenced the outcome.

The SEA process is intended to ensure the integration of the plan making process with the consideration of the likely significant environmental impacts of a plan and provide for this consideration on a cumulative basis. In doing so, the SEA process adds value to the plan making process and should be viewed as a positive measure that shall ensure the systematic consideration of alternatives together with the identification of mitigation and monitoring measures.

In simple terms though, the SEA process means that in making the plan, important environmental matters that require special types of planning considerations are sieved out. As a result, special and identifiable attention is given in the plan making process to these environmental issues. It also means that environmental issues are examined on a cumulative basis as opposed to at a local site level only (for example through consideration of a planning application and associated EIS). This means that the SEA process brings environmental considerations strongly

into planning at the highest level in the decision making process and therefore the benefits should flow down through to a local level through local area plans or through planning applications. In other words, the aim is to consider environmental impacts in tandem with the making of the development plan so as to try to 'get it right' from the top down.

2.2 Legislative Background

The Planning & Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) gave effect to the SEA Directive 2001(2001/42/EC) so as to integrate SEA into current plan making procedures. As a result, SEA is required in respect of development plans, variations to development plans and local area plans likely to give rise to significant environmental effects.

2.3 Steps taken and the Strategic Environmental Assessment requirement

On 20th September 2007, Letterkenny Town Council and Donegal County Council jointly published notice to commence the review of the Letterkenny & Environs Development Plan 2003-2009 (as varied) to result in the preparation of a new plan entitled Letterkenny & Environs Development Plan 2009-2015.

Having regard to the population of the plan area as greater than 10,000 persons, the preparation of a Strategic Environmental Assessment is a mandatory requirement (Planning & Development (Strategic Environmental Assessment Regulations) 2004 refer).

As a consequence, a scoping exercise was carried out so as to ensure that the relevant environmental issues are identified and that these issues be addressed within the environmental report. The scoping report was issued to the prescribed Environmental Authorities for consultation resulting in submissions from (a) The Department of the Environment, Heritage & Local Government providing comments in relation to architectural heritage and (b) the Department of Communications, Marine & Natural Resources advising that the Department had no further comment at this time.

A final scoping report was subsequently prepared on foot of the consultation with the prescribed Environmental Authorities. This report brought together the preliminary scoping exercise and the consultation with the prescribed Environmental Authorities so as to ensure the relevant environmental issues are identified in order that they can be addressed appropriately in the environmental report. As a result, the emerging environmental issues forming the scope of the environmental report were identified as:

- Biodiversity, flora & Fauna: Impact on landscape (valley sides, the estuary, elevated/ visually sensitive area, designated green areas, Greenfield lands) and the biodiversity network (River Corridor, Kiltroy Woods, Ballymacool Woods).
- Population and human health: The need to create a safe, healthy and high quality environment to live in, to work in and to visit concentrating on quality of life.
- Soil, water, & air/climatic factors: Impact of proposed zoning in relation to climate change, sustainability agenda, flood risk, transport and air quality. The ongoing threat to water quality due to release of pollutants and restricted capacity of WWTWs.
- Material assets and cultural heritage/architecture and archaeology: Reconciliation of development with national monuments, protected structures, important landscapes, water bodies, important views and prospects.

3.0 Methodology

3.1 General

The methodology used follows the requirements of the SEA Directive and the Department of Environment, Heritage, & Local Government 'Implementation of SEA Directive (2001/42/ EC): Assessment of the Effects of Certain Plans and Programmes on the Environment, Guidelines for Regional Authorities and Planning Authorities' November 2004. Annex 1 of the Directive details the information to be included in the environmental report, summarised as follows:

- An outline of the contents, main objectives of the plan and its relationship with other relevant plans/programmes.
- A description of the relevant aspects of the current state of the environment and the likely evolution of the environment without implementation of the plan.
- A description of the environmental characteristics of areas likely to be significantly affected.
- Identification of any existing environmental problems, which are relevant to the plan particularly, those relating to any European protected sites.
- A list of environmental protection objectives, established at international, EU or national level, which are relevant to the plan and describe how those objectives and any environmental considerations have been taken into account when preparing the plan.
- A description of the likely significant effects on the environment including on matters such as biodiversity, population, human health, fauna, flora soil, water, air, climate factors, material assets, cultural heritage, including architectural and archaeological heritage, landscape.
- A description of the mitigation measures to prevent, reduce and as fully as possible offset any significant adverse environmental effects of implementing the plan.

- An outline of the reasons for selection of alternatives considered and a description of how the assessment was undertaken (including any difficulties).
- A description of monitoring measures.
- Non-technical summary of the above information.

3.2 Additional Studies Commissioned

In order to inform the preparation of the plan and the Environmental Report, Letterkenny Town Council and Donegal County Council engaged Glás Enviro Teo, Environmental Consultancy to prepare a Biodiversity Report in relation to the study area

3.3 Consideration of Alternatives

In accordance with Article 5 of the SEA Directive, 3 alternatives have been considered in this process as follows:

- a. Continuation of existing policy framework.
- b. Planning for neighbourhoods.
- c. Sustainable development of the Gateway.

Each alternative is considered in greater detail at section 7.0 of this environmental report. As a result, alternative 3 is the preferred option.

4.0 Contents, main objectives of the plan and its relationship with other relevant plans and programmes

4.1 Background

Letterkenny Town Council and Donegal County Council are preparing this plan jointly under the provisions of the Planning & Development Acts 2000-2006, Part II, Chapter 1. On adoption, this plan shall be the statutory development plan for the area of Letterkenny and its environs (as defined in the plan) for the period 2009-2015. The geographic area that is covered by the plan comprises some 2,600 hectares/ 6426 acres. The town is situated on the River Swilly valley slopes and the River Swilly traverses through the plan area west- east. Significant areas of established woodland are located at Kilttoy, Gortlee and Ballymacool and undeveloped lands have retained substantial levels of biodiversity and traditional rural form.

4.2 Contents and main objectives of the plan

The main objectives of the Letterkenny & Environs Development Plan 2009- 2015 are set out at Volume 1: Core Document, Part A, Section 2.0 and are described as 'strategic objectives'. The strategic objectives are as follows:

1. To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.
2. To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.
3. To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.
4. To consolidate the town centre and promote the area as a quality urban environment through the establishment of design quality and

public realm, improvement of permeability and access throughout, management of pedestrian and vehicular traffic, promotion of alternative modes of transport and enhancement of the architectural heritage of the town centre.

5. To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.
6. To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.
7. To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked Gateway status of Letterkenny - Derry, in particular the growing population and economic activity.

The scale, type and location of development envisaged during the life of the plan is such that the spatial distribution of lands for immediate uptake for various uses are located closer to the core of the town so as to provide for consolidation of land use activity and integration of neighbourhood form. Lands located on the fringe of the town are identified for longer term strategic residential uses and these would not be anticipated as being appropriate for development in the short to medium term unless there is a clear evidenced led justification for their development. In addition, development will be concentrated away from or managed within, lands of environmental importance in terms of landscape value, important views, biodiversity value. Development within the flood risk area will be managed and will be required to ensure appropriate measures are taken so as to minimise the effects of flooding as a result of new development. General employment uses are concentrated in the east of the town around the areas of Bonagee, through to Carnamuggagh Lower. The town centre area is to be consolidated with the prioritisation of infill development and merging of the traditional Main Street area with the newly developing area to the east. Community, education, and open space activity will take place within the existing and newly emerging neighbourhoods of the plan area at locations where gaps are identified or future need will arise.

The type of development that is anticipated is that there will be a concentration of quality new development using design form and layout that contributes to the delivery of integrated sustainable neighbourhoods.

As a result, new development will provide for the creation of places with a strong sense of character and which are positive places for people to live and work in.

The amount of land supply provided results in:

Land Use Zone	Area in Hectares	% of total
Established Development	759	24.38
Strategic Community Opportunity	27	00.87
Town Centre	163	5.24
Primarily Residential	343	11.02
Strategic Residential Reserve	313	10.05
General Employment	143	4.59
Commercial	31	1.00
Opportunity Sites	99	3.18
Education	51	1.64
Open Space	234	7.52
Local Environment	240	7.71
Services	665	21.36
Education Opportunity Site	12	0.39
Low Density Residential	33	1.05

4.3 Relationship with other relevant plans and programmes

This plan is prepared within a framework of existing plans and programmes. The relationship of this plan to others is considered below:

- **National Spatial Strategy (2002)**

The National Spatial Strategy (NSS) was launched by Government in November 2002 and sets out a strategic vision for the spatial development of Ireland over a 20-year period. The key aim of the NSS is to achieve regional balance in terms of physical, social and economic development. As a means of achieving this aim, the strategy identifies a tiered national settlement structure designed to promote adequate opportunities for each region to develop to its full potential.

Within this settlement structure, Letterkenny has been identified as a linked Gateway with Derry, a high priority development corridor of national, regional, local and cross-border economic importance. It is envisaged that

it will be within this corridor where future growth and investment will be promoted and primarily channelled, with the advantages and spin offs filtering to positively impact on all areas of the county. It is considered that the role of Letterkenny, in tandem with Derry as a linked Gateway, is to the forefront of this development plan.

- **Architectural Heritage Protection, Guidelines for Planning Authorities (2004)**

In line with the requirements of the Planning and Development Act 2000, these Guidelines aim to assist local authorities in the adoption of suitable policies for protecting architectural heritage in their development plans and to ensure that they have practical effect through development control measures. It also offers guidance to Planning Authorities on determining planning applications in relation to protected structures or the exterior of a building within an Architectural Conservation Area.

The protection of Letterkenny's listed buildings and Architectural Conservation Areas plays an integral part of the Letterkenny and Environs Development Plan together with other policies in respect of the wider built heritage of the town. The Plan is considered to be consistent with these Guidelines.

- **National Biodiversity Plan (2002)**

In response to the requirements set out in Article 6 of the EU Convention on Biodiversity, the Department of Arts, Heritage, Gaeltacht and the Islands adopted the National Biodiversity Plan in 2002. The overall goal of the Plan is to "secure the conservation, including where possible the enhancement, and sustainable use of biological diversity in Ireland and to contribute to conservation and sustainable use of bio-diversity globally". As a means of achieving its goals, the Plan sets out 91 actions designed to ensure the protection and sustenance of Ireland's biodiversity and its habitats.

The principles of the National Biodiversity Plan are inherent in this review of the Letterkenny and Environs Development Plan, particularly with regard to the preparation of a Biodiversity Study to inform the plan making process.

- **National Climate Change Strategy (2000)**

Based on the principles of sustainability, as set out in 'Sustainable Development-A Strategy for Ireland 1997', the NCC Strategy aims to reduce Ireland's greenhouse gases to 13% above 1990 levels, as required under an agreement made by the United Nations Framework Convention on Climate Change in 1997.

Whilst recognizing the need to support Ireland's economic growth and competitiveness, this strategy provides a framework for reducing our greenhouse emissions through the use of economic instruments (including taxation and emissions trading) and a broad range of policies and measures tailored specifically to relevant sectors. In relation to the built environment and residential sector specifically, measures include improved spatial and energy use planning with reference to residential density guidelines. In relation to the transport sector, the key measures of the strategy include increased use of public transport. The Letterkenny and Environs Development Plan embraces the principles set out in this strategy in the policy presented or identifies future imminent programmes of work that will further achieve consistency with these principles.

- **National Development Plan 2007- 2013**

The key role of the National Development Plan is to manage the investment of funds in plans and programmes in a way that supports the key strategic objectives of the National Spatial Strategy. The current NDP represents the most ambitious funding programme ever proposed for Ireland and proposes the investment of some €184 billion in five investment priorities of (1) economic infrastructure (2) enterprise, science and innovation (3) human capital (4) social infrastructure and (5) social inclusion.

The NDP 2007- 2013 sets out a Regional Development Strategy that is based on the framework of the 2002 NSS. This involves promotion of investment in the nine gateway centres referred to in the NSS, including Letterkenny - Derry, complemented by development of the NSS Hub and County towns and their rural hinterlands. The Letterkenny and Environs Development Plan is considered to be consistent with the National Development Plan 2007-2013.

- **National Heritage Plan (2002)**

The Department of Arts, Heritage, Gaeltacht and the Islands published the National Heritage Plan in April 2002. A key concept of this plan is to "place the protection and enjoyment of heritage at the heart of public life". The Plan, therefore, aims to set out a clear and coherent strategy and framework for the protection and enhancement of our heritage, based on the principles of sustainability. It is considered that the Letterkenny and Environs Development Plan is consistent with the principles of the National Heritage Plan 2002.

- **Sustainable Development: A Strategy for Ireland (1997)**

To illustrate its commitment to the principles of sustainability, the Irish Government adopted "Sustainable Development - A Strategy for Ireland" in 1997. The strategy provides an analysis and framework to integrate and prioritise sustainable development into every sector of Irish life. The overall aim of the strategy is, 'to ensure that economy and society in Ireland can develop to their full potential within a well protected environment, without compromising the quality of that environment, and with responsibility towards present and future generations and the wider international community.'

As such, the Strategy highlights the need for Planning Authorities to take a strategic view of settlement patterns, development requirements and infrastructure needs in their Development Plans to avoid excessive suburbanisation, which is considered to be inefficient in the use of land, energy and transport. It states that Government funding for infrastructural development will not be forthcoming in the event of excessive and unnecessary land zoning in Development Plans. The principles of sustainability, particularly in relation to zoning of the land are integral in this development plan.

- **Towards Sustainable Local Communities: Guidelines on Local Agenda 21 (2001)**

Local Agenda 21 was established as the result of the Earth Summit in Rio de Janeiro in 1992. This document is an agreement for meeting the challenges of the environment and development into the next century. At a national level the government is, as a result of signing the document, committed to ensuring that the relationship between socio-economic growth and the environment is not negative. In effect, this implies that

development should not exceed the carrying capacity of its local environment. Local Agenda 21 also encourages consultative processes which involve the whole community, its local elected members and other community and representative groups through means of information awareness, public consultation and feedback, partnerships between authorities, businesses and communities, and a continuous monitoring of progress towards sustainability. The principles of Agenda 21 are being met through the process of Strategic Environmental Assessment and through the ongoing implementation commitments of this plan.

- **Border Regional Planning Guidelines**

The Border Regional Planning Guidelines, published in 2004, are designed to ensure the future socio-economic prosperity and competitiveness of the Border region. The guidelines build on the settlement structure set out in the National Spatial Strategy, identifying and recognising the importance of the Letterkenny-Derry linked Gateway and its role in energising the North West of the region as a whole. The future prosperity of the Gateway and its hinterlands is central to the Letterkenny and Environs Development Plan.

- **County Donegal Development Plan 2006-2012**

The County Donegal Development Plan 2006-2012 sets out the county settlement strategy for County Donegal. In doing so the County Donegal Development Plan 2006-2012 identifies Letterkenny as a linked Gateway with Derry in line with the NSS and Border Regional Planning Guidelines together the identification of the economic corridor linking the 2 settlements. It is considered that this plan supports and is consistent with the spatial strategy of the County Development Plan 2006-2012 in that the objectives of this plan aim to complement and support the linked Gateway status.

The plans and programmes described above have been considered in the preparation of the development plan and have been integral in terms of the establishment of strategic objectives for Letterkenny and its Environs.

5.0 The State of the Environment

This section sets out the current state of the environment and forms the record of the baseline environmental information relating to the plan area and how the environment would be expected to change without the implementation of the development plan. In addition, this section gives a description of the environmental characteristics that are likely to be significantly affected by the plan and identifies any existing environmental problems in the area.

5.1 Description of relevant aspects of the current state of the environment and the evolution of that environment without the implementation of the plan.

5.1.1 Population and Human Health

The population of the Letterkenny and Environs Development Plan area in 2006 is 19,363 persons representing a high percentage growth since 2002 at a rate of 21.6%. Letterkenny also has a higher than average in-migration level.

In the year 2005-2006, 2,564 people moved into Letterkenny from the County, Country and abroad. A total of 4229 people within the Letterkenny Plan area were born outside of Ireland (CSO 2006). Of these, 2439 people were born in the UK, 279 in Poland, 34 in Lithuania, 285 in the EU 25 and 1192 born in 'the rest of world'. The population of Letterkenny is projected to grow to between 36,000- 39,000 by 2020. The supply of land to meet the projected population will be catered for by lands zoned 'residential' that are neither developed nor have planning permission granted thereon. This supply of land totals 307ha while the land mass required to meet the need is approximately 106ha, therefore providing an excess of 'residential' zoned lands in the region of 201ha.

The perceived health of those living in Letterkenny can be represented through a number of the indicators that are used to describe the state of the environment at other parts of this section such as, air quality, water quality, levels of other pollutants, occurrence and quality of Material Assets & Cultural Heritage - Architecture and Archaeology. Other 'quality of life' indicators are identifiable through the neighbourhood analysis at Volume 1,

Part B of the plan which shows the existing spatial distribution of open space, childcare facilities, education, neighbourhood centres as examples.

The provision of community facilities, amenities and infrastructure (quality of life indicators) to support new developments within and surrounding the town centre has been slower and has struggled to keep up with the pace at which development is happening. There is a necessity to provide for the proper residential and associated infrastructural development on the basis of the key neighbourhood growth nodes so as to maximise investment and gain the greatest human health benefit in a spatial context.

POPULATION & HUMAN HEALTH NON-IMPLEMENTATION OF THE PLAN

Non implementation of the plan would likely result in a lack of coordination in terms of focusing attainable levels of development into specific areas, thereby aiding the creation of critical mass as well as creating well planned places to live and work. Non implementation of the plan would likely result in a continuation of current issues such as the prohibitive cost of securing land in the neighbourhood areas for community facilities and amenities thus preventing community gain.

Human health would also be likely to be affected through contact with potentially polluted river and streams within the catchment which could be mitigated against with various types of environmental controls.

5.1.2 Biodiversity

As part of the preparation of the Letterkenny and Environs Development Plan, Letterkenny Town Council and Donegal County Council commissioned Glás Enviro Teo, Environmental Consultancy to prepare a biodiversity study for the area of the plan. The baseline information identified through the biodiversity study is as follows:

- **European protected sites**

There are four European protected sites within the plan area, the details of which are set out in the table below.

Type, Site Code, Name and Site Synopsis

Lough Swilly - Special Protection Area

Site Code: 004075

Site Synopsis:

This site, situated in the northern part of Co. Donegal, comprises the inner part of Lough Swilly, a long inlet of the sea that cuts through a variety of metamorphic rocks on the west side of the Inishowen Peninsula. The Lough Swilly SPA extends from just below Letterkenny north to Rathmullan and, except in the area between Farsetmore and Blanket Nook on the southern side of Lough Swilly, the site is bounded by the High Water Mark; its seaward boundary is the Low Water Mark.

Between Farsetmore and Blanket Nook a series of improved pasture and arable fields of importance to geese and swans are included. The site includes sections of the estuaries of the River Swilly, the River Leannan and the Isle Burn and the predominant habitat is a series of extensive sand and mud flats which are exposed at low tide - both estuaries and sand/mud flats are listed on Annex I of the E.U. Habitats Directive. Other habitats represented on the site are salt marshes, lakes which are lagoonal in character (at Blanket Nook), rivers and streams, sand and shingle beaches, lowland wet, dry and improved grasslands, arable land, drainage ditches, reedbeds and scrub. The adjacent Inch Lough and Levels are included in a separate SPA.

Lough Swilly is an important site for waterfowl in autumn and winter. The shallowwaters provide suitable habitat for grebes and diving duck, while the intertidal flats are used by an excellent diversity of wildfowl and waders. At high tide, the duck and wader species roost on the salt marshes and shorelines, with some species moving to the adjacent pasture and arable fields. In the three winters 1994/95 to 1996/97, 16 species occurred in nationally important numbers as follows (figures are average maximum counts for the 3 winters): Great Crested Grebe (274), Shelduck (646), Wigeon (1,673), Teal (1,381), Mallard (1,155), Shoveler (58), Scaup (143), Goldeneye (169), Red-breasted Merganser (103), Coot (335), Oystercatcher (1,459), Knot (327), Dunlin (7,995), Curlew (1,716), Redshank (1,080) and Greenshank (30). Other species which occur in regionally or locally important numbers, and at times may exceed the threshold for national importance, include Brent Goose, Pochard, Tufted

Duck, Lapwing, Ringed Plover, Grey Plover, Bar-tailed Godwit (a species that is listed on Annex I of the E.U. Birds Directive) and Turnstone. The site is also an important area for the Great Northern Diver and the rare Slavonian Grebe, both Birds Directive Annex I species. Golden Plover, a species that is listed on Annex I of the E.U. Birds Directive, used the site regularly during winter (4 year mean of winter maximum 1994/95-1997/98 was 1,001 individuals).

Lough Swilly supports internationally important numbers of Greenland White-fronted Geese (5 year mean of winter maximum 1995/96-1999/00 for the Lough Swilly flock was 970 individuals), Whooper Swans (5 year mean of winter maximum 1995/96- 1999/00 was 1,135 individuals, the largest population in the country) and Greylag Geese (5 year mean of winter maximum 1995/96-1999/900 was 2,020 individuals - this figure includes both migratory birds of the Icelandic population as well as an estimated 750-1,000 feral birds). The numbers of Greylag Geese using the site has continued to increase in recent years. The main areas of the site used by these species are at Big Isle, Farsetmore, Blanket Nook and Ballylawn. The Inch Levels are used by the same flocks of geese and swans - this area is included in a separate Special Protection Area. Both Greenland White-fronted Goose and Whooper Swan are listed on Annex I of the E.U. Birds Directive.

This site is major ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance and 3 species occurring within the site in numbers of international importance. The site is regularly used by in excess of 20,000 waterfowl and thus qualifies as of international importance. The site is used by several species that are listed on Annex I of the E.U. Birds Directive.

26.2.2002

Lough Swilly - Special Area Conservation

Site Code: 00166

Site Synopsis:

This large site, situated in the northern part of Co. Donegal, comprises the inner part of Lough Swilly. It extends from below Letterkenny to just north of Buncrana. Lough Swilly is a long sea-lough, cutting through a variety of metamorphic rocks on the west side of Inishowen.

The site is estuarine in character, with shallow water and intertidal sand and mud flats being the dominant habitats. The main rivers flowing into the site are the Swilly, Lennan and Crana. At low tide, extensive sand and mud flats are exposed, especially at the mouths of the Swilly and Lennan rivers. Bivalves and polychaete worms are well represented in the macro-invertebrate fauna, with species such as Cockles (*Cerastoderma edule*), Mussels (*Mytilus edulis*), Baltic Tellin (*Macoma balthica*), Ragworm (*Nereis diversicolor*) and Sand Mason (*Lanice conchilega*) being common. Cord-grass (*Spartina anglica*) is well established on parts of the intertidal flats. The shoreline above the flats varies from bedrock shore to shingle or cobbles, and here is found a scattering of salt tolerant plants such as Scurvygrass (*Cochlearia officinalis*), Sea Milkwort (*Glaux maritima*) and Red Fescue (*Festuca rubra*).

Salt marshes are well represented in the inner sheltered areas of the site, with good examples in the Ramelton area. The marshes are the Atlantic salt meadow type, and are characterised by such species as Thrift (*Armeria maritima*), Sea Milkwort (*Glaux maritima*), Sea Aster (*Aster tripolium*), Sea Arrowgrass (*Triglochin maritima*) and Red Fescue (*Festuca rubra*).

Lakes, which are lagoonal in character, occur at Inch and Blanket Nook. Inch Lough is a good example of a large, shallow lagoon with very low salinity in most of the lagoon. Less information is available for Blanket Nook but it is of a higher salinity and adds to the richness of the habitat within the site as a whole. The vegetation in Inch is diverse and typically lagoonal, with well developed charophyte communities, including a large population of *Chara canescens* (a Red Data Book species). It also supports Horned Pondweed (*Zannichellia palustris*) and a mixed Pondweed/Tassleweed Community (*Potamogeton pectinatus*/*Ruppia*

maritima). The green alga *Chaetomorpha linum* occurs at Blanket Nook. The aquatic fauna at Inch is rich and diverse and includes a range of lagoonal specialists and species that are apparently rare. These include *Lekanesphaera hookeri*, *Palaemonetes varians*, *Conopeum seurati*, *Sigara stagnalis*, *S. concinna*, *Jaera nordmanni*, *Neomysis integer* and *Cordyllophora caspia*. Less information is available on the aquatic fauna at Blanket Nook, though several lagoonal specialists have been recorded, including *Jaera ischiosetosa*, which appears to be a rare species in Ireland. Inch Lough is regarded as of significant conservation value for ectonotal Coleoptera, with several species indicative of well-developed shoreline habitats including two that are apparently rare: *Bembidion bipunctatum*, a halotolerant shore species, and *Bembidion aeneum*, a stenotopic halobiont species. Although artificial in origin, the lagoon habitat in this site is one of the largest and best examples of a shallow, low salinity lagoon habitat in the country.

Two woodlands occur adjacent to the north-western shore of Lough Swilly. These are Rathmullen and Carradoan Woods, the former being a Nature Reserve. They are dominated by Sessile Oak (*Quercus petraea*) and Birch (*Betula pubescens*), but many other species are present including exotics such as Beech (*Fagus sylvatica*). Alder (*Alnus glutinosa*) and Willows (*Salix* spp.) occur in the wetter parts. An area of wet heath, dominated by Ling (*Calluna vulgaris*), occurs on the hill above Carradoran Wood. These woodlands display a generally intact structure and support a range of breeding birds, including Woodcock.

A further area of woodland, scrub and heath occurs above the north-east shore at Crockacashel and at Porthaw. Oak/Hazel (*Corylus avellana*) scrub is frequent, and there is a well developed ground flora with species such as Wood-sorrel (*Oxalis acetosella*), Herb Robert (*Geranium robertianum*), Lady's fern (*Athyrium filix-femina*) and Broad Buckler Fern (*Dryopteris dilatata*). The heath vegetation includes Ling (*Calluna vulgaris*), Common Gorse (*Ulex europaeus*), Wood Sage (*Teucrium scorodonia*) and Tormentil (*Potentilla erecta*). In the wetter areas, Purple Moor-grass (*Molinia caerulea*) and Cross-leaved Heath (*Erica tetralix*) occur.

The site supports a population of Otter, a species listed on Annex II of the EU Habitats Directive.

Lough Swilly is an important site for waterfowl in autumn and winter. The shallow waters provide suitable habitat for grebes and diving duck, while the intertidal flats are used by an excellent diversity of wildfowl and waders. At high tide, the duck and wader species roost on the salt marshes and shorelines, with some species moving to the adjacent pasture and arable fields. In the three winters 1994/95 to 1996/97, 16 species occurred in nationally important numbers as follows (figures are average maximum counts for the 3 winters): Great Crested Grebe (274), Shelduck (646), Wigeon (1,673), Teal (1,381), Mallard (1,155), Shoveler (58), Scaup (143), Goldeneye (169), Red-breasted Merganser (103), Coot (335), Oystercatcher (1,459), Knot (327), Dunlin (7,995), Curlew (1,716), Redshank (1,080) and Greenshank (30). Other species which occur in regionally or locally important numbers, and at times may exceed the threshold for national importance, include Brent Goose, Pochard, Tufted Duck, Lapwing, Ringed Plover, Grey Plover, Bar-tailed Godwit and Turnstone. The site is also an important area for the Great Northern Diver and the rare Slavonian Grebe.

The adjacent pasture and arable polders at Inch, Big Isle and Blanket Nook support internationally important populations of Whooper Swans, Greenland White-fronted Geese and Greylag Geese. Inch Lough is an important roosting area for these birds and at times they utilise other parts of Lough Swilly for roosting.

This site is of conservation importance as it contains good examples of at least four habitats listed on Annex I of the EU Habitats Directive (estuaries, lagoons, Atlantic salt meadows, old oak woods) and supports a population of Otter. In addition, it is of high ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance, plus 3 species occurring within the site and on adjacent polders in numbers of international importance.

14.03.2003

Lough Swilly, Big Isle, Blanket Nook, Inch Lake - Natural Heritage Area
Site code: 00166
Site Synopsis: Same as site synopsis for Lough Swilly SAC (002287) above.

River Swilly Valley Woods - Natural Heritage Area
Site code: 002011
Site Synopsis:

The River Swilly Valley Woods NHA consists of ten separate fragments of woodland one to the North East of Letterkenny in County Donegal, the other nine in the Valley to the west of the town.

Woodland has been planted in this area in the past, but more natural cover has developed also, so that the trees present today are a mixture of natives and exotics. Major native trees are the Hazel (*Corylus avellana*), Ash (*Fraxinus excelsior*) and Oak (*Quercus robur*) in drier parts, with Alder (*Alnus glutinosa*), Willow (*Salix* sp.) but especially Birch (*Betula* sp.) in the wetter areas. Exotic trees include Beech (*Fagus sylvatica*) and Sycamore (*Acer pseudoplatanus*). A range of age structures occurs across the site, so that some spaces are of a scrubby nature - Gorse (*Ulex europaeus*) and Bracken (*Pteridium aquilinum*) are frequent in more of these parts.

On the ground, woodland species such as Foxglove (*Digitalis purpurea*), Wood Sorrell (*Oxalis acetosella*), ferns such as Hardfern (*Blechnum spicant*) and various mosses and lichens occur.

Further habitat diversity is provided by a number of heathy areas with Heather (*Calluna vulgaris*), Purple Moor-grass (*Molinia caerulea*), Bog Asphodel (*Narthecium ossifragum*) and Common Cotton grass (*Eriophorum angustifolium*) among the parts to be found there. Rocky streamside ravines provide another habitat as do wet grassland and sites of former hazel coppice.

Some parts of the site are threatened by overgrazing by domestic stock, while other parts are suffering from ingorous growth of Rhododendron. These two threats lower the interest of what is otherwise a valuable refuge in the area for flora and fauna.
 12.07.1995.

• **General biodiversity within the plan area:**

The general biodiversity of the plan area is captured on the habitats mapping (Map 1 at the rear of this report) prepared by Glás Enviro Teo. The assessment in general terms shows a range of habitat types including mixed semi-natural woodland, dry heath, unimproved grassland, bare ground, dense continuous shrub and improved grassland as examples. The general habitats character can be segregated into the following general sectors together with an indication of the quality of biodiversity:

Sector	Description	Level of biodiversity
Urban core; Main Street and area around St. Eunans Cathedral	Main Street 2.5km in length located on a hill with extensive landscape view of Glenswilly. Main Street consisting of retail, commercial and residential properties. Main Street generally retains its traditional townscape character. Tree planting at Market Square provides niche habitat for passerine birds. Older buildings provide a nesting habitat for house martins, swallows and swifts during the summer period. Urban Feral pigeon found to be rare therefore reducing avian competition for passerine birds. Area around St Eunans Cathedral retains original rock outcrop and upland shrub character with gorse shrub and native trees retained.	Low to moderate biodiversity.
Retail and commercial estates	Sylvian culture (tree and shrub) landscaping of	Low to moderate biodiversity.

Sector	Description	Level of biodiversity
	marginal areas surrounding buildings and car parking. Apparent increasing local biodiversity of urban marginal areas.	
Residential estates	Older residential estates close to Main Street consist of mature and semi-mature gardens providing niche habitat for small passerine birds. Most recently constructed estates are found to be less diverse with small areas of grass lawns and limited shrub or tree planting. Some retention of traditional hedgerow and linear tree boundaries apparent within estate landscape.	Low to moderate biodiversity.
Agricultural land	(Much of Strategic Residential Reserve, Local Environment) Agricultural lands from pasture fields with linear hedgerow boundaries and tree lines to small areas of tillage fields. Retains agricultural identify of mixed farming. Filed systems enclosed by hedgerows and linear tree lines.	Moderate-high biodiversity (Semi-improved pasture and hedgerow environments). Low to moderate biodiversity (Areas of tillage and improved pasture fields)

- **Special areas of biodiversity within the plan area:**

3 areas of special biodiversity habitats have been identified for more specific consideration within the plan area. Each special area is set out below:

- Ballymacool Woods, Whinney Hill, Rodgers Burn, Drum Hill:
Whinney Hill is an upland meadow grassland habitat with a high percentage of gorse shrub and consisting of a steep gradient. The area is moderately diverse in its ecological diversity and retains the old traditional field boundaries and trees. Drum Hill is the site of a Mass Rock. Rodgers Burn is a fast flowing mountain stream that rises in the upland of Ballymacool and enters the River Swilly close to the GAA playing fields on the banks of the Swilly. The area of Ballymacool once held a small area of oak woodland which has been partially felled at the Ballymacool estate and the existing woodland is a designated NHA. A new town park is currently under development. The park retains the old hedgerow boundary and standalone trees as part of the featured town landscape. The area consists of linear hedge, tree line, dry humid acid grassland, scrub, semi improved grassland, hedgerow with trees, scattered shrub, mesotrophic running water. Dominant site habitat is semi-improved pasture fields enclosed to the traditional stone ditch and hedgerow boundaries with scattered trees. Floristic biodiversity of the local plant communities was found to be moderate. Himalayan Balsam found growing along Rodgers Burn but not established within the stream. Primrose and violets blooming along the stream banks in early summer 2008. Nettle and bramble frequent close to the embankments. Small woodland passerine birds found to be abundant within the area close to the stream.
- Kiltooy Woods
Kiltooy Woods is semi natural woodland located at the East northeast boundary of Letterkenny. The woods tree structure is of local provenance. The tree canopy is loose knit allowing sunlight to filter through to the woodland floor providing a sound under canopy growth of shrub and ground flora. Birch found to be the dominant tree species with Willow, Elder, Blackthorn, Hawthorn, Alder and Oak frequent. The woodlands were managed by coppicing in the past, a traditional woodland management that has declined over the past twenty years. The woodland area is high in biodiversity providing an important habitat for small passerine bird species within an urban environment. The woodlands also provide habitat for small animals such as rabbit, stoat, badger and possibly squirrel. Consists of linear hedge, tree line and dry meadow.

c) River Swilly

River consists of dyke/pollard Dutch engineered system as rail embankment and flood defence system within the area of the Swilly alluvial plain. The dyke and pollard system were introduced in the circa of the 18th century with the introduction of the Donegal railway and traditionally provided three distinct roles namely (a) A rampart for the railway tract along the river embankment (b) A flood plain defence system and (c) Wet meadow management system for early grass production. The river section is slightly polluted in places with potential alterations to the aquatic environment with a detrimental affect. Himalayan Balsam was found to be a dominant occurring river bank flora. Competition of native flora species is undermined by Himalayan balsam due to its rapid spread and ability to become established. Japanese Knot Weed was also identified growing along the river embankment which is a non- native species which grows profusely once established, eradicating local indigenous flora. Broken into three sections of River, the following additional information is relevant:

i. River Swilly West Conwal to Dunnes Stores

Geology is Termon Formation Pelites. Dominant site habitat is semi improved pasture fields enclosed to the east and west by engineered earth banks (dykes). The adjoining fields have been designed to utilize the spring flood water to increase early grass growth in the area of wet meadow land. Floristically, biodiversity of the local plant communities was found to be low. The fields were found to be small enclosed by tree and hedgerow dyke. Himalayan Balsam, Nettle and bramble shrub were found to be dominant on embankments. Small woodland passerine birds were found to be abundant. Large area of improved grassland with access from north along the R250 road.

ii. Dunnes Stores to Ballyraine:

Geology is Termon Formation. The section is located within an area of reclaimed alluvial coastland, consisting of primary and secondary dyke systems. The dyke systems were created and designed during the Londonderry and Lough Swilly (LD&LS) railway construction period of mid 18th century. The engineering land management of the alluvial coastal plain has allowed the extensive use as prime arable lands for growing barley and oat crop. The section at present is used as development land, and infilled to raise the ground level. Dyke system

is mostly intact. Plant species diversity was found to be generally very low, increasing along the existing dyke bank. Small woodland passerine birds were found to be abundant. The tall mature trees provide nesting for rooks and crows. Rabbit seen frequently.

iii. Ballyraine/Port/Bonagee:

Geology is Lough Foyle Succession Schist and grit with thin marble units. The section is located within an area of reclaimed alluvial coastland, consisting of primary and secondary dyke systems. Extensive use as prime arable lands for growing barley and oat crop. The section at present is used as cattle pasture. Plant species diversity was found to be generally low, increasing along the hedgerow ditches. Small woodland passerine birds were found to be abundant. The tall mature trees provide nesting for rooks and crows. Bird species noted during the field survey was a flock of 6 *Oenanthe* Wheatears within open hill area, a flock of 30 *Sturnus vulgaris* (Starlings) flying between the stands of hazel and hawthorn scrub. 10 of hooded crow *Corvus corone cornix* were sighted flying above the lowland pasture fields to the north of the site. Numerous woodland birds were observed within the stands of woodland scrub; *Fringilla coelebs* (Chaffinch), *Phylloscopus trochilus* (Willow Warbler), *Motacilla alba ssp. Yarelli.*(wagtail), *Erithacus rubecula* (Robin), *Prunella modularis* (Dunnock), *Turdus merula* (Black bird) *Certhia familiaris* Tree creeper, *Phyrrhula phyrrhula* (Bull finch) and a small flock of 7 *Anthus pratensis* (meadow pipit). Likely habitat for badger, fox and rabbit. Otter was not observed during site visits.

BIODIVERSITY
NON-IMPLEMENTATION OF THE PLAN

Non- implementation of the plan will result in reduced protection for important habitats and areas of special biodiversity. The planning framework of the development plan aims to strengthen the protection in particular in relation to European designated sites and in relation to the form of development permissible within 'Local Environment areas.'

Furthermore, the plan provides the environment for the balanced and measured approach to the development of an urban area set against the need to protect natural habitats. In doing so the plan advocates the

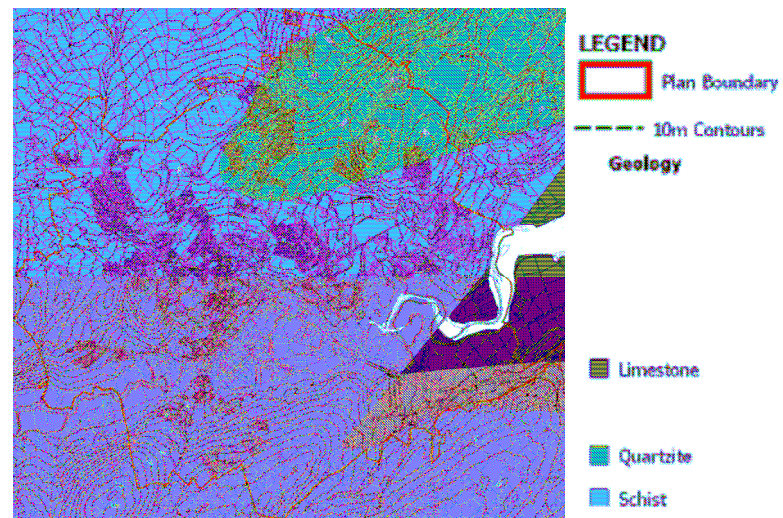
coordination of important natural habitat areas (where appropriate) within the urban form so as to contribute to the delivery of a quality urban environment and added opportunities for the public to utilise and benefit from the surrounding natural environment. Non- implementation of the plan would dilute this ethos and therefore have resultant negative effects on population and human health as there will be reduced retention of natural habitat area, reduced access to natural habitat areas and reduced opportunities for the development of quality urban areas.

5.3.1 Geology/Soil

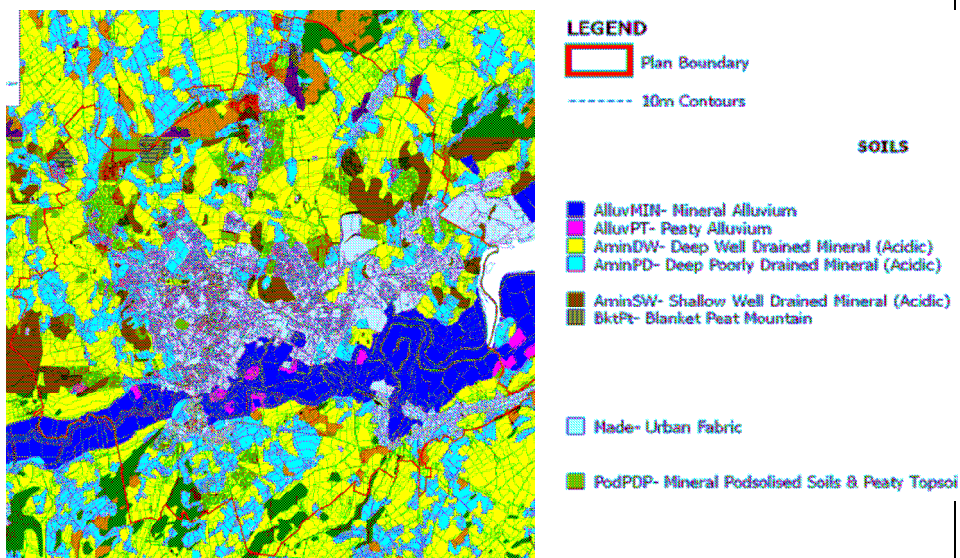
The underlying geology of the area falling within the plan boundary was for the most part formed during the Precambrian Era and comprises 3 rock types, as follows:

- Termon Formation (Schist) - This rock type dominates the plan area
- Lower Crana Quartzite - Comprises 2 areas within the plan area, 1 covering the areas of Carnamuggagh, Lisnennan, Knockybrin and Woodland and another covering the area from Drumnahoagh along the N13 to the plan boundary
- Dungiven Limestone - Comprises a small piece of land to the North of the N13 covering the areas of Bonagee, Glebe and Dromore.

The detail of rock type and location is illustrated on the map below:



Soil types occurring throughout the area range from shallow to moderate depth peaty podzols and established podzolics types with a moderate percentage of loam and sandy clays. Ground in most places appears to be relatively free draining, however there are areas prone to localised water-logging. The detail of soil type and location can be seen on the accompanying map.



GEOLOGY/SOIL

NON-IMPLEMENTATION OF THE PLAN

Non- implementation of the plan will not result in significant changes from the existing affects in relation to geology/soil. However, the long term objectives in relation to the preparation of a flood study will bring positive benefits in terms of ensuring for appropriate mitigating measure sin relation to surface water drainage and flood alleviation so as to protect soils/geology from the affects of flooding.

However, it is noted that non- implementation of the plan will result in a more diluted framework in relation to the protection of trees, hedgerows and natural environments in that there will less emphasis on the protection of these natural features and integration of same within the urban environment. As a result, non-implementation of the plan may result in increased erosion to soils.

5.1.4 Air, Noise and Climate Factors

• Air

The European Commission established an Air Quality Framework Directive in 1996 to assess the level of harmful toxins in the environment. This directive was passed under Irish Law in 1999. Initial research has established that, generally, Ireland has a good level of air quality, mainly due to the eradication of the burning of coal in many urban areas during the 1980s and the early 1990s.

Ireland is divided into four zones (A, B, C & D) for the purposes of assessment and management of air quality as defined in the Air Quality Regulations (2002). Letterkenny currently lies in Zone D - this zone is made up of all parts of the country not included in Zones A, B & C, which list certain cities and larger towns in the country with populations above 15,000. Areas in Zone D are not subject to the continuous monitoring of levels of PM10 or assessment of levels of nitrogen dioxide, sulphur dioxide and benzene.

Despite this, the Environmental Health Department of the Health Service Executive West carried out an assessment of air quality in Letterkenny from 22 November 2006 until 1 March 2007. This was initiated due to the observation of smog by Environmental Health staff over the town at various times during previous winters.

This study produced the following findings:

- None of the limit values for sulphur dioxide or black smoke were exceeded during the measurement period
- Levels of nitrogen dioxide (main source: traffic) would suggest that there is merit in further monitoring.
- Sulphur dioxide concentrations were very low relative to the limit values.
- Five out of the twenty nitrogen dioxide concentrations were not within the annual limit value. Four of these five readings were recorded at a major and busy junctions in the town centre.
- Black smoke levels were within both guide and limit levels. However, this should not give grounds for complacency, as the levels detected

are higher than the maximum levels found in certain parts of Dublin during 2005.

The study recommended that:

- a) Further monitoring be carried out of various pollutants to determine whether or not a ban in Letterkenny on the sale, marketing and burning of fuels generating smoke should be recommended.
- b) Statistics be generated regarding respiratory illness in Letterkenny.
- c) That the HSE recommends to the appropriate bodies that Letterkenny be included within the scope of Zone C under the Air Quality Standards Regulations 2002.

The Environmental Protection Agency (EPA) have established a mobile laboratory in the grounds of Donegal County Museum, High Road, Letterkenny. The project commenced on 16th May 2008 and will continue for an approximate period of six months in order to successfully assess the air quality levels in Letterkenny. During the project, the EPA will assess the levels of Ozone, Carbon Monoxide, Nitrogen Dioxide & Nitrogen Oxides, and Sulphur Dioxide as well as the levels of Particulate Matter (pm)* in the air. In general, levels of Carbon Monoxide, Nitrogen Dioxide & Nitrogen Oxides are increasing due to the increased levels of transportation and vehicles on the roads.

The results for the assessment are displayed on the following table. Due to the level of accessible information, the results are for the most recent period of recording.

Substance	Limit level**	Average recorded level
Sulphur Dioxide	350	0
Nitrogen Dioxide	200	7
Carbon Monoxide	10	0.1
Particular Matter (pm10)	50	11.15

All of the recorded figures are extremely low and therefore the EPA have stated that, at this stage in the research project, the air quality level of Letterkenny is very good.

*Particulate Matter (pm) is derived from a combination of vehicle exhaust emissions, soil & road surfaces, construction works and industrial emissions.

**Sulphur Dioxide, Nitrogen Dioxide & PM 10 are measured in microgrammes per cubic meter, whilst, carbon monoxide is measured in milligrammes per cubic meter.

• **Noise**

No baseline data exists in relation to noise pollution in Letterkenny. Issues surrounding noise and noise pollution have not been a prominent concern in Letterkenny to date. However, various complaints are made from time to time in relation to noise nuisance in the town, the sources of which range from the construction industry to late night entertainment venues.

• **Climate**

Climate of Ireland is cool temperate. The weather is changeable and generally enjoys mild weather conditions with little frost during winter months.

**AIR, NOISE AND CLIMATIC FACTORS
NON-IMPLEMENTATION OF THE PLAN**

The affects of increasing volumes of traffic by means of increased urbanisation represents the key impact on the air quality of the environment. Non- implementation of the plan will result in the continued fragmented form of urbanisation that has been occurring to date, particularly in the environs area of the plan where a sequential policy void exists, that results in the inefficient increase in car dependency and journeys throughout the plan area. As a result, there would continue to be a link between the increase in car usage and movement and the threat to air quality. The affect of increases in traffic volumes, in particular lorries and buses has a direct link in terms of ongoing noise levels in Letterkenny.

5.1.5 Water

• **River Water**

The Letterkenny and Environs Development Plan area lies within the River Swilly catchment draining to the Lough Swilly. A Flood Study was carried

out in 2002 (commissioned by the Councils) providing information in relation to the River environment. The River Swilly commences adjacent to the Glendowan Mountains at an elevation of approximately 280mOD Malin. It flows in an easterly direction through Letterkenny and into Lough Swilly. The catchment area including Letterkenny is approximately 119kilometres squared. The catchment is predominantly rural with the only significant urban area at Letterkenny in the downstream end of the catchment. The annual average rainfall for the whole catchment is approximately 1600mm (1200mm in Letterkenny). The River Swilly is tidal throughout Letterkenny and to approximately 2.5km upstream on high spring tides.

Ordnance Survey maps indicate that the land adjacent to the river between Port Bridge and Old Town is marshy and prone to flooding. The OPW Flood maps identify 14 location of flood events recorded in the town. Increasing urbanisation of the catchment is leading to greater flows in the ditches and streams that drain Letterkenny into the River Swilly. At periods of high water levels in the River Swilly this water is unable to enter the river and must be stored in the area directly behind the embankments. Building works and raising of ground levels have reduced the storage capacity of this area. Increasing volumes of surface water runoff and reduced capacity of the storage area will lead to flooding problems. The Flood Study 2002, recommended that all infrastructure below the 5.3m contour should be considered at risk of flooding. The landuse-zoning map accompanying the plan identifies the flood risk area.

River water quality data is sourced from the Environmental Protection Agency indicating a station located at bridge at Newmills, station code 0200. The Q- rating (quality) for 2004 at this location was recorded as 4 showing river water quality at this point to be unpolluted. Recording at station 0250 in relation to the Corravaddy Burn, located at bridge near Bonagee recorded a Q- rating of 2/0 in 2004 indicating river water quality at this point to be seriously polluted.

• Estuary Water

Lough Swilly (SAC) lies to the east of the plan area and is a large estuarine Lough with intertidal sand and mud flat habitats. The trophic status (i.e. increased nutrient loading resulting in eutrophication) of estuarine and coastal water bodies is reported by the EPA. Three relevant

records are available and classification falls into four categories; unpolluted, intermediate, potentially eutrophic and eutrophic. Records show the following for the period 2001- 2005:

- i. Upper Swilly Estuary: Intermediate
- ii. Lower Swilly estuary: Unpolluted
- iii. Lower Lough Swilly: Unpolluted

• Drinking Water

Current water supply in Letterkenny is provided for through abstraction from Lough Salt and Lough Keel of 9MLD. Additional supply in drought years is provided for through abstraction from Lough Reelan. Total safe yield in drought year is 8.45MLD. Demand is at 9MLD and growing. There is minimal operational headroom of 10% and capacity of 10.15MLD.

Having regard to existing water supply capacity, future supply will be provided for through a number of schemes as follows:

- i. Water conservation.
- ii. Boreholes scheme at Ballymacool: To provide 1.8MLD for the short term needs of Letterkenny and to augment existing Lough Salt and Lough Keel sources. Project construction at Euro3.7million involving the construction of boreholes at Ballymacool, water treatment works at Ballymacool and rising main to Ard O'Donnell Reservoir. Quality of the water produced will fully comply with Drinking Water Regulations. . Groundwater to be blended with Lough Salt water to reduce the effect of hardness.
- iii. Lough Greenan Scheme: To provide 1.3MLD for the short terms needs of Letterkenny augmenting existing Lough Salt and Lough Keel sources and to ensure water is abstracted in an environmentally sustainable manner. Scheme involves rising main to Goldrum Reservoir and duplication of Lough Salt Raw Water Main. Lough Greenan water to be blended with Lough Salt and Lough Keel water. Water Treatment Plant upgrade at Goldrum is proposed as a future phase.
- iv. South Letterkenny Water Supply Scheme: To upgrade the water supply south of the River Swilly involving a storage Reservoir at Rahan, trunk and distribution pipelines.

v. Letterkenny/Lough Mourne Scheme: To provide a total of 25MLD, 10 MLD of this for the medium/long term needs of Letterkenny. Project cost will be Euro84million involving impoundment of Lough Mourne, construction of Water Treatment Works, trunk mains to existing network and to Letterkenny Network at Listillion, new reservoir at Listillion, Trunk Main to reconstructed Knocknamona Reservoir, new networks, pumping stations and reservoirs in the Finn Valley area.

• **Urban Wastewater**

Letterkenny is serviced by the Letterkenny Sewerage Treatment works which is of insufficient capacity to cater for the existing and future populations of Letterkenny. The scheme to upgrade the Waste Water Treatment Works will provide appropriate treatment for Letterkenny to be size of 40,000 PE. Commencement of contract is anticipated during 2009 for Design Build and Operate.

WATER
NON-IMPLEMENTATION OF THE PLAN

Non- implementation of the plan will result in the continued intermittent discharge of pollutants to the River Swilly and Lough Swilly with resultant impacts on water quality in the Letterkenny and surrounding areas.

Non- implementation of the plan will result in a more sporadic form of urban development which will result in reduced affect of investment in key infrastructure.

5.1.6 Material Assets and Cultural Heritage

- **Archaeology & Historic Reference** - There are 18 Recorded Monuments within the plan area. These monuments have National Monument status and are protected under Section 12 of the National Monuments (Amendment) Act, 1994.

The detail of these is as follows:

Map No. & Register No:	Type	Townland Location
DG053-015	Cashel	Castlebane
DG053-017	Holy well	Lisnennan
DG053-018	Bullaun Stone	Kiltoy
DG053-019	Church	Kiltoy
DG053-022	Cashel	Ballymacool
DG053-02301	Enclosure	Ballymacool
DG053-02302	Souterrain	Ballymacool
DG053-021	Bullaun Stone	Carnamogagh Lower
DG053-024	Enclosure	Ballymacool
DG053-025	Standing Stone	Sallaghagrane
DG053-026	Enclosure	Ballyrairie
DG053-030	Souterrain	Ballymacool
DG053-031	Souterrain	Ballymacool
DG053-032	Standing Stone	Oldtown
DG053-03303	Bullaun Stone	Drumnahoagh
DG053-034	Enclosure	Scribbly

In addition to these there are various other archaeological sites within the plan area, which are not protected under the National Monuments Act, while there may be other unknown archaeological sites. In terms of areas or features of historic reference the plan area comprises the disused railway line some of which is still intact as well as its associated features such as embankments, gates, stiles.

- **Natural Heritage** - Natural heritage falling within the plan area comprises areas and features such as, public amenity spaces, parks, various walkways, wooded areas, hedgerow, urban gardens, and individual tree species.
- **Waterbodies and associated flood protection measures within the river and estuary** - Comprising the River Swilly tributaries and distributaries e.g. Rogers Burn, embankments, bridges.
- **Built Heritage** - Built heritage falling within the plan area comprises 1 Architectural Conservation Area, 19 buildings on the Record of Protected Structures, an historic streetscape network in the town

centre identified as the 'historic streetscape', identified 'historic buildings' and 'historic residential' areas.

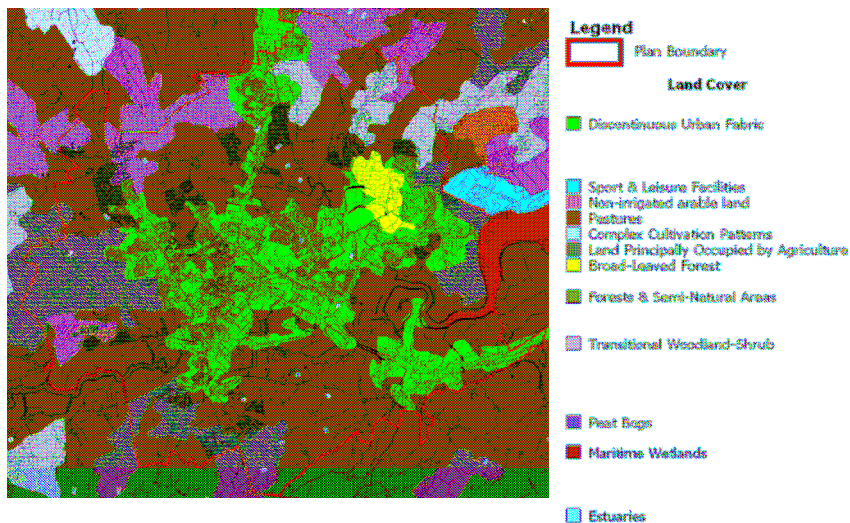
MATERIAL ASSETS & CULTURAL HERITAGE
NON-IMPLEMENTATION OF THE PLAN

Non- implementation of the plan will result in a reduced policy framework for the protection and integration of the built heritage into the urban form, in particular within the town centre and therein may result in the loss of historic fabric and may result in reduced quality in the town centre.

5.1.7 Landscape

The landscape of Letterkenny is rich and varied. It comprises a valley settlement with surrounding local hillocks making up the Swilly Valley's sloping sides. The landscape in the environs of the town is significantly undeveloped on lands intervening the development along the key arterial roads. This land is largely agricultural in nature. The landscape has retained a significant level of tree cover through both the retention of existing trees and hedgerows and as a result of existing dense woodlands at Kilty and Ballymacool.

Land cover within the area is varied and is set out in the following map.



LANDSCAPE
NON-IMPLEMENTATION OF THE PLAN

Non- implementation of the plan will result in lower quality developments both in relation to the individual design and in relation to the layout and form of new areas.

5.2 Description of the environmental characteristics of the area likely to be significantly affected by implementation of the plan

5.2.1 Significant development during the lifetime of the plan

Significant development during the lifetime of the plan, is likely to take place at the following locations and in the following forms:

Location and type of development	What impacts on the environment are likely
Town Centre in the form of retail, commercial and mixed use developments including residential	<ul style="list-style-type: none"> • Positive impact on human health by means of concentrated provision of services and amenities. • Subsequent potential positive on air quality due to clustering of activities therefore reduction in car journeys. • The large area of undeveloped land provides significant opportunities for development. Much of this undeveloped land is located along the River Swilly; adverse impacts of developing this land may include the degradation of the quality of the river and the flora, fauna and biodiversity, which surround the river.
Town centre in the form of residential development on brownfield sites	<ul style="list-style-type: none"> • Positive impact through reuse of town centre land. • Reduction in dependency on cars therefore removal of potential threat to air quality. • Indirectly provides for the protection of biodiversity at other locations within the plan

	<p>area.</p> <ul style="list-style-type: none"> • Provides for opportunity to contribute to the built heritage of the plan area. • Provides for vitality in the mix of uses in the town centre therein contributing to the sustainability of the town centre and resulting in positive impacts on human health.
General Employment lands in the form of redevelopment of existing Brownfield sites and development upon existing Greenfield sites	<ul style="list-style-type: none"> • Potential loss of general biodiversity; hedgerows, individual trees, groups of trees. • Possible negative visual impacts on landscape. • Consolidation of existing uses and reduction of unnecessary trip generation. • Some increase in vehicular movements with subsequent affects on air and noise quality. • Increased volume of heavy load vehicular movement therefore subsequent affects on air and noise quality. • Opportunities for developer assistance to bring forward strategic routes therefore improving movement around the town, resulting in positive impacts on human health in the form of greater choice in terms of movement, enhanced accessibility, reduced journey times, reduced congestion in town centre.
Commercial Lands adjacent to the Port Road	<ul style="list-style-type: none"> • Consolidation of existing uses including bulky retail and commercial. • Intensification of use of existing infrastructure. • Slight increases in noise and air pollution.
Residential lands on Greenfield sites throughout the plan boundary	<ul style="list-style-type: none"> • Potential loss of general biodiversity; hedgerows, individual trees, groups of trees. • Increased trip generation for journeys to centre and subsequent increases in air and noise.

Open Space, Parks and Wildlife corridors	<ul style="list-style-type: none"> • Positive effect of sustaining a relatively high level of biodiversity through the protection of Green Corridors. • Positive human health effects in relation to quality of life by means of access to clean, green spaces.
Neighbourhood Centre creation	<ul style="list-style-type: none"> • Positive human health impacts in relation to quality of life by means of access to local retail and services and the creation of vibrant active neighbourhoods. • Reduction of trip generation through localised provision of day-to-day service and retail needs, therefore reduction of dependence on the car as mode of transport resulting in positive impacts on air quality.
Opportunity Sites	<ul style="list-style-type: none"> • Promotion of reuse of brownfield sites with resultant positive impacts across the spectrum of landscape, biodiversity, soil, air, noise and climate, human health, material assets and cultural heritage.

5.2.2 Sensitive Areas

The following areas within the plan area are considered to be more sensitive to development than others:

- a. River Swilly banks and corridor.
- b. River Swilly flood risk area.
- c. Kilttoy Woods and Ballymacool Woods.
- d. Elevated undeveloped hillside of the town: Drumnahaogh, Creeve, Lisnenan, Kilttoy, Mountain Top, Carnamuggagh, Killylastin, Killyclug.
- e. Rodgers Burn including Whinney Hill and Drum Hill.
- f. Main Street and Ecclesiastical Quarter Architectural Conservation Area.

These areas are identified as more sensitive in nature than others within the plan area due to their character in terms of the range of environmental resources which they provide including biodiversity, flora, fauna, heritage, water quality, landscape, visual aspects and including the natural forces of the town in relation to the River Swilly catchment and flood risk area. The plan will result in positive impacts on areas listed as a) and c), through the protection of these areas from development. The plan will have risks in relation to the likely significant effects on the environment in relation to areas b), d), e) and f) as development potential is identified for these areas within the plan. However, the plan will also have positive impacts on these areas due to the measures developed to manage development at these locations in a manner to achieve quality and appropriate forms of development.

5.3 Identification of any existing environmental problems that are relevant to the plan, particularly those relating to European protected sites.

A number of locations are identified within the plan area as areas that are the subject of environmental problems due to the type of development pressures that persist to date. These are outlined below:

- a. Kilttoy Woods (River Swilly Valley Woods NHA; Site code 002011): The nature of the environmental problem at this location is the pressure for multiple residential development on lands immediately adjoining the

NHA designation and the impact of this development on the biodiversity of the NHA together with visual impacts on the landscape of the encroachment of high density development on this important landscape feature.

- b. Lough Swilly SAC/NHA (site code: 00166) and Lough Swilly SPA (site code: 004075): The nature of the environmental problem at this location is the continued discharge of pollutants to Lough Swilly as a result of the deficiencies in the existing Waste Water Treatment Works capacity. Construction of the upgrade to the WWTW's is anticipated in 2009 and is critical in terms of alleviating this environmental problem and ensuring that the problem is not compounded in the light of the future anticipated growth of the town.
- c. Traditional town centre: The nature of the environmental problem at this location is the pressure for new build development to replace existing built fabric along the 'historic streetscape' of the traditional town centre in a manner which has the potential to conflict with the character of the 'historic streetscape' and with the quality of individual and groups of built fabric. The challenge that presents is the need to promote the traditional town centre as the heart of the town therein providing for new town centre opportunities and vitality whilst developing innovative proposals for the scale and form of floorspace required. New floorspace therefore, should respect and recognise the important character of the 'historic streetscape' and the contribution of this streetscape to the attractiveness of the town centre to both visitors and investors.
- d. Environs area of the plan: The nature of the environmental problem in this area is the pressure for multiple residential developments on lands that are essentially Greenfield, together with the pressure for additional housing proposals on lands identified as 'Strategic Residential Reserve.' This problem is compounded by the quality of layout and forms that as a result do not create quality residential environments that are integrated and sustainable. Specifically this means that the type of difficulties encountered are (i) Impacts on human health as there is a lack of linkages with existing and planned social and community services (ii) Impacts on human health as there is little or no integration of new proposals within a neighbourhood concept (iii) Impacts on human health as there is a lack of infrastructure and physical services to facilitate the development and (iv) Impacts on

landscape and biodiversity (v) Results in car dependant land use pattern as no alternatives in terms of accessibility are available.

6.0 Environmental protection objectives relevant to the plan and description of how those objectives and any environmental considerations have been taken account in preparing the plan

The following section lists environmental protection objectives that are relevant to the plan area of the Letterkenny & Environs Development Plan 2009-2015. These environmental protection objectives are derived on the basis of (a) national, European, and international policy documents, strategies, conventions and Directives that set out the key guiding principles in terms of sustainable development and environmental protection and (b) the indicative list of environmental protection objectives set out in the DoEHLG guidelines to Regional Authorities and Planning Authorities, 'Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programmes on the Environment' and (c) an understanding of the environmental characteristics that are specific to the plan area and that as such require consideration within the environmental protection objectives.

The strategic alternatives, growth strategy, plan aims, strategic objectives, objectives and policies of the plan will be measured against these environmental protection objectives.

Biodiversity, Fauna and Flora:

B1: Conserve and enhance designated areas and other areas and features of biodiversity while increasing potential for flora and fauna, where appropriate.

B2: Balance the protection of natural resources with the harnessing of such resources for education, tourism, research and amenity where appropriate.

Population, Human Health:

P1: Ensure the creation of a safe, healthy and high quality environment to live, work and visit including the strengthening and diversification of the local economy.

P2: Ensure the provision of an adequate and sustainable transportation network comprising strategic roads, public transport, walkway/cycleway and the elimination of car dominated development.

P3: Improve quality of life by ensuring the provision of necessary physical and social infrastructure to serve existing and new communities.

P4: Minimise noise, vibration and emissions from traffic and industry.

Soil (including minerals):

S1: Maintain the quality of soils.

S2: Give preference to the re-use of brownfield lands with a particular emphasis on regeneration of town centre areas, rather than developing greenfield lands.

S3: Minimise the consumption of non-renewable sand, gravel and rock deposits.

S4: Minimise the amount of waste going to landfill.

Water:

W1: Protect and enhance the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems.

W2: Promote sustainable water use based on a long-term protection of available water resources.

W3: Reduce progressively discharges of polluting substances to waters.

W4: Mitigate the effects of floods and droughts.

W5: Ensure adequate good quality water supply to serve existing and new communities.

Air, Climate, Noise:

A1: Reduce all forms of air pollution.

A2: Minimise emissions of greenhouse gases to contribute to a reduction and avoidance of human-induced global climate change.

A3: Reduce energy use and waste of energy, and maximise use of renewable energy sources and sustainable construction methods.

A4: Reduce trip generation, trip length and the need for motorized transport.

A5: Assess, plan and manage adaptation to climate change impacts such as areas of flood risk.

A6: Minimise noise pollution.

Material assets, Cultural Heritage:

M1: Protect, enhance and utilise material assets and cultural heritage, including built heritage, archaeology & historic reference, natural heritage, waterbodies and associated flood protection measures and views and prospects.

M2: Avoid flood risk and/or river and coastal erosion in selecting sites for development.

Landscape:

L1: Conserve and enhance valued natural and historic landscapes and landscape features.

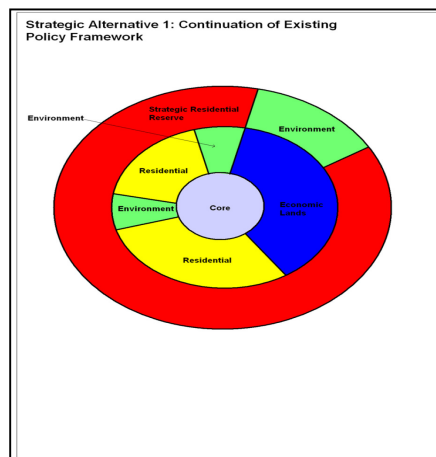
L2: Harness and respect the natural form and character of the landscape in a balanced manner ensuring integration of urban form

7.0 Consideration of alternatives

Article 5 of the SEA Directive 2001/42/EC requires that the environmental report shall set out reasonable alternatives. In doing so, 3 strategic alternatives are considered in order to identify a preferred growth strategy. Each alternative is schematically described below together with the key characteristics of the alternative and an assessment of the alternative against the environmental protection objectives.

7.1 Strategic Alternative 1: Continuation of existing policy framework

This alternative comprises continuation of the zoning framework adopted in 2003 providing for the town centre and area of town centre extension, identification of 'General Employment' lands to the East of the plan area, 1st phase release of residential lands supported by 2nd phase strategic residential reserve and defined areas of 'Local Environment' that provided for limited development where the



landscape has the capacity to absorb. This alternative loosely identifies neighbourhoods within the plan area that are to be strengthened in terms of settlement patterns and provision of local facilities.

The key principles of this strategic alternative are as follows:

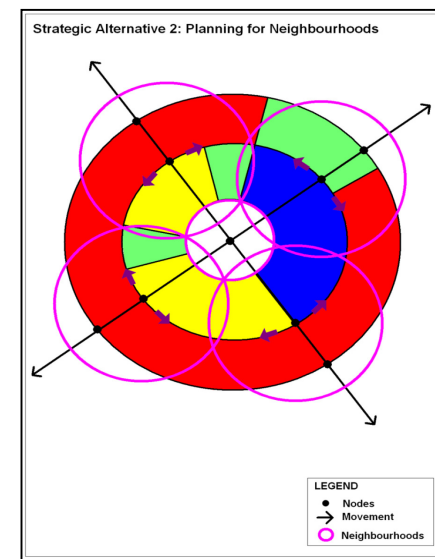
- Promote growth & development as the centre for the northwest.
- Enhance the natural & built environment.
- Support and protect existing economic base
- Strengthen the town centre
- Consolidate and strengthen urban form.
- Improve the quality of residential neighbourhoods.
- Support vibrant communities.
- Identify and prioritise infrastructural improvements.

7.2 Strategic Alternative 2: Planning for Neighbourhoods

This alternative continues the principle zoning framework of the development plan adopted in 2003 but places a greater emphasis on the identification of neighbourhoods and planning around a neighbourhood concept. In doing so, an understanding of the functionality of the existing neighbourhoods in the town is essential together with a strategy for integration of neighbourhoods, development of new emerging neighbourhoods and strengthening the function and form of the town centre.

The key characteristics of this strategic alternative are:

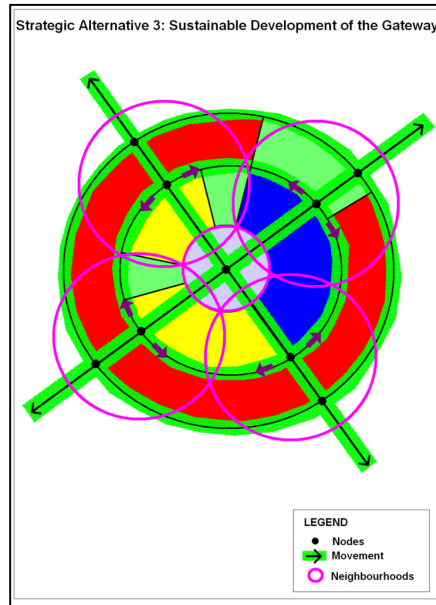
- Promote growth & development of the linked Gateway.
- Consolidation of the urban footprint.



- Integration of neighbourhoods.
- Quality in urban form throughout the plan area.
- Vitality in services/amenities in the context of neighbourhoods.

7.3 Strategic Alternative 3: Sustainable Development of the Gateway

This alternative again continues the principal zoning framework of the development plan adopted in 2003 and also incorporates the neighbourhood concept set out at strategic alternative 2. In addition, this alternative engages wholly in the Strategic Environmental Assessment process by clearly identifying the environmental assets of the plan area and planning for the balanced development of these environmental resources. These environmental resources include as examples, providing a framework in respect of the river corridor, harnessing the potential of the towns built heritage, identifying opportunities for green corridors/linkages. This alternative aims to deliver the characteristics of a Gateway town.



The key characteristics of this strategic alternative are:

- Support the Gateway status in a sustainable manner.
- Consolidation of urban footprint.
- Integration of neighbourhoods.
- Permeability via corridors.
- Balanced development of environmental resources.
- Quality of urban form.
- Vitality of services.

7.4 Assessment of the likely significant impacts on the environment of implementing the strategic alternatives:

Each of the options 1, 2 & 3 are considered against the environmental protection objectives formulated and set out at section 6.0 previously. In line with the DoEHLG Guidelines, the potential effects on the environment of each option are measured using the following assessment categories:

- √ Significant beneficial impact
- ? Uncertain Impact
- X Significant adverse impact
- O No relationship or insignificant impact

The assessment of each alternative against the environmental protection objectives is set out in the form of a matrix table as follows.

Environmental protection objectives	Strategic alternatives		
	1	2	3
B1	√	√	√
B2	√	√	√
P1	√	√	√
P2	?	√	√
P3	?	√	√
P4	√	√	√
S1	√	√	√
S2	√	√	√
S3	?	?	?
S4	?	?	?
W1	√	√	√
W2	√	√	√
W3	√	√	√
W4	?	?	?
W5	√	√	√
A1	√	√	√
A2	√	√	√
A3	?	√	√
A4	√	√	√
A5	√	√	√
A6	?	?	?
M1	√	√	√
M2	x	?	?
L1	√	√	√
L2	√	√	√

The matrix table above makes an assessment of each strategic alternative against the environmental protection criteria. Essentially, each strategic alternative will result in a significant benefit in terms of their likely impact on the environment. However, the significant benefits arising from alternative 3 are likely to be greater than the significant benefits arising from alternatives 1& 2. In other words the benefits arising from alternative 3 are greater as this alternative provides for a more sophisticated and

detailed approach to the planning framework. Uncertain impact is identified where at a strategic level clarity on the likely impacts are difficult to capture and will be more readily ascertained on assessment of objectives and policies throughout the plan.

7.5 Preferred Strategic Alternative

On the basis of the assessment, option 3 is considered to be the preferred option/ growth strategy for the plan. This represents a balanced approach that recognises the need to integrate sustainability and the impact of the plan on the environment into the policy framework in a manner that means that the planning framework utilises existing environmental resources so as to create a quality urban environment that represents the linked Gateway with Derry for the northwest region. In particular this plan aims to protect key priority areas from new development and at the same time, builds in safeguards elsewhere in terms of design briefs, design statements, concept proposals, infrastructure, density as examples.

8.0 Assessment of preferred option/growth strategy

The following section sets out the assessment of the preferred option against the environmental protection objectives that were established at section 6.0 previously.

Having chosen option 3: 'Sustainable Development of the Gateway', as the preferred option/ growth strategy due to its compatibility with the environmental protection objectives (section 7.0 of this environmental report refers), the environmental report now considers the likely significant effects on the environment in greater detail.

To do so, four steps are undertaken:

- a. Matrix assessment to ensure the strategic objectives of option 3/ the preferred option (i.e. the growth strategy) are compatible with the overall plan aim.
- b. Matrix assessment to ensure the strategic objectives of option 3/ the preferred option (i.e. the growth strategy) are compatible with each other.
- c. Matrix assessment to consider the impact of the strategic objectives of option 3/ the preferred option against the environmental protection objectives set out at section 6.0 of this report.
- d. Matrix assessment to consider the impact of the objectives and policies of the plan, flowing from the strategic objectives of option 3/ preferred option against the environmental protection objectives set out at section 6.0 of this report.

Each step is set out on the following pages.

8.1 Compatibility of strategic objectives with overall plan aim (step a)

Overall plan aim	Strategic objective	Compatibility
To promote the sustainable growth and development of Letterkenny and its environs as a linked Gateway with Derry so as to focus on the delivery of quality urban structure through the strengthening of neighbourhoods, the promotion of improved quality of life and the promotion of social inclusion and equal access to employment, housing, transport, education and social & cultural activities.	Strategic Objective 1: To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports	√
	Strategic Objective 2: To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.	√
	Strategic Objective 3: To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.	√
	Strategic Objective 4: To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.	√
	Strategic Objective 5: To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.	√
	Strategic Objective 6: To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.	√
	Strategic Objective 7: To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny - Derry, in particular the growing population and economic activity.	√

In each case, the strategic objectives are (a) found to have a direct relationship with the overall plan aim and (b) found to be compatible with this aim.

8.2 Compatibility of strategic objectives (Step b)

The assessment below is classified as follows: √ Compatible; X Not compatible; O No relationship; ? Uncertain

	Strategic Objective						
1	To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports	1					
2	To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.	√	2				
3	To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.	√	√	3			
4	To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.	√	√	√	4		
5	To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.	√	√	√	√	5	
6	To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.	√	√	√	√	√	6
7	To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny - Derry, in particular the growing population and economic activity.	√	√	√	√	√	√

The assessment shows that the strategic objectives are found to be inextricably linked and that in terms of the principles set out in the strategic objectives there is compatibility across the full range. The positive interrelationship of these strategic objectives with each other sets a strong framework for the development of further objectives and policies within each section of the plan.

8.3 Assessment of strategic objectives against environmental protection objectives (Step c)

Strategic objective	Environmental Protection Objectives																								
	B		P				S				W					A						M		L	
	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1	2
1. To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports	0	√	√	0	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	√	0	0	0	0
2. To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.	0	0	√	√	√	√	√	0	0	0	0	√	0	√	√	√	√	0	√	√	0	0	0	0	0
3. To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.	0	√	√	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0
4. To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.	0	0	√	√	√	√	0	√	0	0	0	0	0	0	0	√	√	0	√	0	√	√	0	√	√
5. To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.	√	√	√	0	0	√	√	√	√	0	√	√	√	√	0	√	√	√	0	√	√	√	√	√	√
6. To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.	0	0	√	√	√	√	√	0	0	0	0	0	0	0	0	√	√	0	√	0	√	0	0	0	0
7. To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked gateway status of Letterkenny - Derry, in particular the growing population and economic activity.	0	0	√	√	√	√	0	0	0	0	0	√	√	0	√	√	√	√	√	0	√	0	0	0	0

The assessment shows that the strategic objectives show generally positive impacts across a broad range of the environmental protection objectives. This indicates that the strategic objectives comprehensively address the range of environmental issues that are identified within the plan area and that they are generally positive impacts or no impact at all.

8.4 Assessment of objectives and policies against environmental protection objectives

The following pages set out the assessment of the detailed policies contained in the plan in terms of their compatibility with the environmental protection objectives set out at section 6.0 of this environmental report. The assessment is set out in the form of a matrix using the following assessment criteria:

- √ Significant beneficial impact
- ? Uncertain Impact
- X Significant adverse impact
- O No relationship or insignificant impact

The matrices are arranged in line with the sequence of policy sections contained in the Letterkenny & Environs Development Plan, Volume 1, Part B.

Developing Neighbourhoods Through Urban Design

Policy	Assessment of policies against environmental protection objectives																								Comment			
	B		P				S				W					A					M		L					
	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1		2		
Objective To achieve the aims of consolidation, integration, vitality and quality.	√	O	√	√	√	√	O	√	√	√	√	√	O	O	O	O	O	O	√	√	√	√	O	√	O	√	√	
Objective To develop a strategic framework extending from strategic neighbourhood level to local level so as to guide new development.	√	O	√	√	√	O	O	O	√	√	√	√	O	O	O	O	O	O	√	√	√	√	O	√	O	√	√	
Objective To develop sustainable neighbourhoods that are quality places to live.	√	O	√	√	√	O	O	O	√	√	√	√	O	O	O	O	O	O	√	√	√	√	O	√	√	√	√	
Objective To reduce negative impacts on the environment through improved permeability and accessibility within the urban form.	√	O	√	√	√	O	O	√	√	√	√	√	O	O	O	O	O	O	√	√	√	√	O	√	√	√	√	
Objective To harness the urban form in a manner that engages and acknowledges the quality of existing built fabric and which provides opportunity for new and innovative built form including the preparation of a Character Appraisal of the 'Historic Streetscape' of Letterkenny.	O	O	O	O	O	O	O	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	√	√	O	O	O	
N1: Delivering the vision for neighbourhoods. The Councils will seek to work in partnership with Government Departments, other agencies and service providers, the community and voluntary sector, the business community and the construction sector to deliver the Vision for each 'key growth node neighbourhood'.	O	O	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health
N2: Development proposals within 'Key Growth Node Neighbourhoods.' Proposals for new development will, in the first instance be considered at a strategic level by the developer within the context of the neighbourhood strategy set out in Part B, Section 2.0 of this plan, so as to demonstrate that the proposal: a. Contributes to the vision (written and mapped) for the 'key growth nodes neighbourhoods.' b. Relates to the wider neighbourhood strategy and land use zonings within the neighbourhood. c. Provides for opportunities for linkages, social/community infrastructure and the development of neighbourhood nodes.	O	O	√	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	O	O	O	O	O	Significant beneficial impacts focused on population and human health
N3: Urban Design Principles: Development proposals shall be required to demonstrate that the 12 urban design criteria set out in the Department of the Environment, Heritage and Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, have been utilised in the design and layout of the proposal.	O	O	√	√	√	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	O	O	√	O	√	√	√	Significant beneficial impacts focused on population and human health and on the landscape
N4: Informing Design Through Historic Buildings and Streetscapes The Councils will utilise the form and layout of existing historic buildings and streetscapes in Letterkenny so as to inform (a) good urban design (b) the development of integrated sustainable neighbourhoods and (c) proposals for development at a local level. In doing so, the Councils will implement policies N5 -N16 and the policies contained in Part B, Section 7.0	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	√	√	Significant beneficial impacts focused on landscape
N5: Historic Buildings. The Councils will, in relation to buildings identified on the land use zoning map as 'Historic Buildings': a. Protect, enhance and promote 'historic buildings' within the Letterkenny plan area. b. Where an 'historic building' reflects a residential character or was previously used in a residential capacity, compliance with those policies in relation to the 'historic residential' will be sought (Policies N15-N16 refer).	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	√	√	Significant beneficial impacts focused on landscape
N6: Record of Protected Structures. The Councils will protect structures included on the Record of Protected Structures (hereafter referred to as the RPS) by ensuring any works including maintenance, alteration/extension and/or repair of a Protected Structure shall be carried out in a manner sensitive to the character and setting of the structure.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	√	√	Significant beneficial impacts focused on landscape
N7: Works to a Protected Structure Works to a Protected Structure will only be permitted where it is clearly demonstrated that proposed works will enhance the character and setting of the Protected Structure.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	√	√	Significant beneficial impacts focused on landscape
N8: Demolition The Councils will resist the demolition of any protected structure or proposed protected structure.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	√	√	Significant beneficial impacts focused on landscape
N9: Content of planning applications at a Protected Structure. Planning applications in relation to a Protected Structure will include such information as is outlined in the 'Architectural Heritage Protection Guidelines for Planning Authorities', Chapter 6, as prepared by the Department of the Environment, Heritage & Local Government.	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	O	√	O	√	√	√	√	Significant beneficial impacts focused on landscape

Policy	Assessment of policies against environmental protection objectives																								Comment	
	B		P				S				W					A						M		L		
	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1		2
N10: National Inventory of Architectural Heritage Policy: The Councils will support the work of the NIAH in collecting data relating to the architectural heritage of the county. Structures identified worthy of note by the NIAH will be considered by the planning authority as such, before making a decision on related planning applications.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N11: Additions to the RPS It is the policy of the Councils to identify future additions to the Record of Protected Structures and undertake to make such additions under the provisions of the Planning and Development Act 2000-2006, Section 55, during the lifetime of this plan.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N12: Development affecting Protected Structures. It is the policy of the Councils to: a. To protect buildings on the Record of Protected Structures their setting and curtilage/attendant grounds, and to ensure development proposals do not threaten the special character of the Protected Structure and; b. To ensure any proposed development within the vicinity of the protected structure shall be sited and designed so as only to positively impact upon the setting and character of the protected structure referred to.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N13: The Ecclesiastical Quarter Architectural Conservation Area It is the policy of the Councils to implement an Architectural Conservation Area, in accordance with the Planning & Development Act 2000-2006 herein described as 'The Ecclesiastical Quarter ACA.'	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N14: Management of the ACA It is the policy of the Council to manage the ACA as follows: - a. The Councils shall ensure that any development in the ACA will be carefully controlled to protect, safeguard and enhance their special character. The special character of the area includes its traditional building stock and material finishes, spaces, streetscape, landscape and setting. b. Streetscape views within, into and out of the ACA shall be maintained, enhanced and protected, particularly with reference to the character of Cathedral Square, Church Lane, and Castle Street c. It is the policy of the Councils to ensure that any development, modification, alteration or extension affecting a protected structure, adjoining structure or structure within an Architectural Conservation Area, are sited and designed appropriately and are in no way detrimental to the character or setting of the structure or surrounding area. d. It is the policy of the Councils to protect structures recorded on the RPS and features that contribute to the character of the ACA. e. In consideration of applications for development within the ACA, the following principles will apply: • Proposals will only be permitted where they positively enhance the character of the ACA. • The siting of new buildings will, where appropriate, retain the existing street building line. • The massing and scale of any new building form will respect and positively integrate with neighbouring buildings and the character of the area. • Where it is not desirable to comply with car parking standards, in respect of developments within an ACA, the Councils will consider a Financial Contribution in lieu of shortfall in car parking spaces.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape
N15: Areas identified as 'Historic Residential.' It is the policy of the Councils to protect the residential communities within the town centre, as identified on the land use zoning map as 'Historic Residential' and their residents in order to provide an attractive user friendly and safe living space for the town's residents.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	√	√	0	0	√	0	√	0	Significant beneficial impacts focused on population and human health
N16: Management of 'Historical Residential.' It is the policy of the Councils to manage areas designated as 'Historical Residential' on the land use zoning map as follows: - a. The Councils will to ensure the character, setting and design of the 'historic residential' is protected, either in an individual or collective capacity, so as inappropriate intervention or redevelopment will not be permitted. b. The Councils will to protect historic houses and associated outbuildings and as importantly their site, setting/attendant grounds to include gatehouses, trees, boundary walls/railings and laneways as an important element of our identity to inform future generations. c. The Councils will facilitate the re-use of traditional buildings and associated outbuildings of value in favour of the unsustainable and unnecessary demolition of remaining traditional building stock. d. Where an 'historic building' as identified on the land use zoning map reflects a residential character or was previously used in a residential capacity, compliance with policy (N15 and N16) in relation to the 'historic residential' are to be referred to.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	√	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health and management focus on historical residential including an emphasis on the landscape
N17: 'Development proposals within 'Established Development.' Proposals for development within areas zoned as 'Established Development' will only be permitted where it can be demonstrated that the proposal will integrate affectively with the surrounding area and that there will be no over- development of the site or inappropriate densities. In this regard, a proposal must demonstrate that the development is appropriate in its context and setting, that the scale, massing, footprint and height is appropriate and that it does not detract from the character, amenity and design of the surrounding neighbourhood including the character, amenity and design of surrounding buildings. Proposals for intensification of an existing site within 'Established Development' shall be required to submit a design concept to demonstrate the appropriateness of the proposed development in line with this policy.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	0	0	Significant beneficial impacts focused on population and human health
N18: Signage Policy The Councils are in favour of promoting the functionality, health and vibrancy of Letterkenny through effective signage. The Councils will promote the use of Irish language, colour coding and symbols to provide quick and easy recognition. All signage should respect the architectural environment of National Monuments, important structures areas of civic amenity, and the natural environment of views and prospects of special amenity value and interest. Volume 2 - Development Guidelines & Technical Standards contains detailed definitions and permissible signage both public and privately, for the following categories: - Directional Welcome, Information & Interpretative Commercial & Business Tourism B & Bs, Guesthouses, Hotels Advertising Where a proposed sign is not covered in the above categories, the Councils will apply the criteria best suited to the proposed type of signage.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape

Housing

Policy	Assessment of policies against environmental protection objectives																						Comment			
	B		P				S				W					A						M		L		
	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1		2	1	2
Objective To supply sufficient quantity and range of lands to meet future housing need including social and affordable housing need.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective To ensure future sufficient strategic landbank.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective To promote quality in new residential areas.	√	0	√	√	√	√	√	0	√	√	√	0	0	0	0	0	√	√	√	√	√	√	√	√	√	
Objective To promote the delivery of sustainable integrated residential neighbourhoods through new residential development.	√	0	√	√	√	√	√	0	√	√	√	0	0	0	0	0	√	√	√	√	√	0	0	0	0	
H1: New Housing Development New housing development will predominantly be accommodated on lands zoned for the purposes of 'Primarily Residential' as outlined in policy H2 below. However, the Councils will consider new housing development at other locations as follows: a. Within 'Established Development' subject to policy N17 b. Within the town centre subject to the policies set out in Part B, section 7.0 c. Within identified 'Opportunity Sites' where the planning brief for the 'Opportunity Site' is such as to include residential development.	0	0	√	√	√	0	0	x	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	
H2: Housing within 'Primarily Residential.' The Councils will support proposals for housing development on lands identified as 'Primarily Residential' on the land use-zoning map.	0	0	√	√	√	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
H3: Single Houses in 'Primarily Residential' Proposals for single dwellings will only be permitted on lands identified as 'Primarily Residential' where it can be clearly demonstrated that: a. The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of comprehensive integrated residential development/s utilising the entire site area; and b. The location and layout of the dwelling would not compromise the line of any proposed relief road; and c. The proposal would not be detrimental to the residential amenity of the neighbouring properties or be injurious to the general character of the surrounding area.	0	0	√	0	0	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
H4: Release of 'Strategic Residential Reserve.' The Councils will ensure the adequate supply of future strategic landbank for the purposes of housing beyond the life of the plan through the identification of lands as 'Strategic Residential Reserve.' The Councils will examine the release of 'Strategic Residential Reserve' lands on the basis of justification in the context of an annual housing monitor, the continued assessment of need and levels of supply and availability of or requirements for physical and social infrastructure in the context of the neighbourhood strategy. Release of 'Strategic Residential Reserve' lands shall only be carried out in the context of a variation to the development plan.	0	0	0	0	0	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

Policy	Assessment of policies against environmental protection objectives																								Comment		
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	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1	2	1		2	
<p>H5: Single Houses in 'Strategic Residential Reserve.' Proposals for single dwellings will only be permitted on lands identified as 'Strategic Residential Reserve' where it can be clearly demonstrated that;</p> <p>a. The location and layout of the dwelling would not compromise the ability of the site to facilitate the provision of long term multiple residential development/s upon release of the land in accordance with its strategic function under Policy H4; and</p> <p>b. The location and layout of the dwelling would not compromise the line of any proposed relief road or infrastructure corridor; and</p> <p>c. The scale and form of the development would respect the existing character of the area and shall not have an adverse impact to the existing character of the area or the residential amenity of adjoining properties; and</p> <p>d. The proposal can reasonably connect to the future provision of mains services to the area; and</p> <p>e. The development will not prejudice access to land within the reserve for future development and will not contribute to forms of ribbon development that cumulatively could result in the land locking of the 'Strategic Residential Reserve'.</p>																											Potential negative affect in relation to the re-use of brownfield lands and regenerating the town centre as policy H5 is in relation to land zoned as strategic residential reserve which are mainly greenfield lands.
<p>H6: Integrated Sustainable Neighbourhoods The Councils will require that proposals for new residential development are of a design concept, form and layout that will contribute to the delivery of sustainable residential neighbourhoods in line with Part B, Section 2 of this Plan, the Department of Environment, Heritage & Local Government publications entitled, 'Sustainable Residential Development In Urban Areas, Guidelines for Planning Authorities,' May 2009 and 'Urban Design Manual, A Best Practise Guide,' February 2008 and policies H7, 8 & 9 of this plan.</p>	0	0	√	√	√	√	0	0	0	0	0	0	0	0	√	0	0	√	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.	
<p>H7: Design Briefs The Councils will undertake to prepare a series of Design Briefs in respect of lands zoned 'Primarily Residential' that will be used in the assessment of planning applications and against which a Design Statement in the context of a planning application (policy H8 refers) will be measured.</p>	0	0	√	√	√	√	0	0	0	0	0	0	0	0	√	0	0	√	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.	
<p>H8: Design Statements The Councils will require Design Statements to be submitted as part of any planning application process for all multiple developments. Design Statements shall address the Design Brief (where available) that has been prepared by the Councils.</p>	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	0	0	√	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.	
<p>Policy H9: Concept Proposals The Councils will require that a Concept Proposal be submitted as part of any planning application for multiple developments. The Concept Proposal will describe elements of the scheme such as land uses and density range, open space hierarchy and built form, boundary conditions and connections and identify any requirement for an EIA.</p>	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	0	0	√	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.	
<p>H10: Assessing planning applications for housing schemes The Councils will use the 12 criteria set out in the Department of Environment, Heritage & Local Government publication, 'Urban Design Manual, A Best Practise Guide', February 2008, during both pre- application consultations and at planning application stage for housing schemes. In addition, new housing schemes will be required to demonstrate:</p> <ul style="list-style-type: none"> That the design is sympathetic and responsive to the site characteristics including the landform, exposure to climate, and the built and natural heritage. That the design provides for a high quality residential development both in terms of the overall site and also in relation to the individual dwelling in recognition of the acceptance of higher densities. That the design considers all aspects of the layout in totality ensuring compatibility between structures, public amenity spaces, landscaping, and access to and within the site, and That the design does not interfere negatively with the residential amenity of adjoining/adjacent properties and that new homes offer a decent level of amenity, privacy, security and energy efficiency. That the design promotes and encourages walking and cycling in line with Policy H13. That the design provides for the right quantity and quality of public open space in line with Policy H18 & H19. That the design includes measures to ensure satisfactory standards of personal safety and traffic safety within the neighbourhood. 	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	0	0	√	√	√	0	√	0	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.	
<p>H11: Managing Quality The Councils will not permit proposals for new housing schemes where the design is such that it does not respond to the policies to achieve quality set out at H6, 7, 8, 9 & 10 of this plan nor to the guidance set out in the Department of the Environment, Heritage & Local Government publication 'Urban Design Manual, A Best Practise Guide', February 2008.</p>	0	0	√	√	√	√	0	0	0	0	0	√	0	0	√	0	0	√	√	√	0	√	0	√	√	Significant beneficial impacts focused on population and human health, landscape and air, climate and noise.	
<p>H12: Design of Residential Streets The layout and design of streets in residential areas shall provide for clarity in the role and function of each street by identifying clearly the hierarchy of streets that will provide for: connectivity and permeability; sustainability in terms of priorities to walking, cycling and public transport together with a reduction in the need for car borne trips; safety; legibility in that streets should be easy for people to find their way around and; sense of place in that streets should contribute to the creation of attractive and lively places. A dominance of cul-de-sacs without provision for other functions of streets will not be permitted.</p>	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, and landscape		
<p>H13: Accessibility Direct pedestrian and cycle linkages shall be provided within proposals for new housing schemes interconnecting with central amenity areas, adjoining neighbourhood developments and neighbourhood facilities and provided in addition to the primary access to the development and be designed to have maximised passive surveillance from surrounding properties be well lit and maintained and of a materials and finish that is of a high quality. Linkages that follow indirect routes and to the rear of properties will not be considered acceptable.</p> <p>Road layouts shall reflect the requirements of Policy H12: 'Design of Residential Streets' and where appropriate, (i.e. adjacent to amenity areas, schools and community/neighbourhood facilities) introduce the use of raised surfaces to reduce traffic speed. Adequate provision shall be made within the development to accommodate drop-off/pick-up points and turning manoeuvres for public transport vehicles.</p>	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health		
<p>H14: Layout New residential developments shall be laid out and orientated in order to make use of the landscape characteristics including local features and vistas, and maximise from passive solar gain. Development adjacent to amenity areas shall be orientated to face onto the amenity areas to provide maximum informal surveillance. Locating amenity areas to the rear of properties will not be permitted. Dwellings should be designed to present an attractive outlook onto adjacent roads (existing and proposed). Front elevations should not face onto the rear private spaces of other dwellings.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H14	

Policy	Assessment of policies against environmental protection objectives																						Comment			
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	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1		2	1	2
H15: Housing Densities Proposals for new housing development must demonstrate that they achieve the greatest efficiency in the use of the land appropriate to its context, and encourage a sustainable pattern of development whilst ensuring the highest quality residential environment. As a guide, densities of 35-50 units per hectare will be sought. Higher densities may be more appropriate at the following locations but any such proposals must be accompanied by high qualitative standards of design and layout: Town centre. Brownfield sites (defined as any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces) where the Policy N17, entitled 'Development Proposals within Established Development' can also be satisfied. Public transport corridors i.e. within 400- 500 metres of a bus stop (where these exist at present in respect of the town bus service or where public transport networks are planned for the future). Inner suburban/infill where Policy N17, entitled 'Development Proposals within Established Development' can also be satisfied. Institutional lands	0	0	√	0	0	0	0	√	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	√	
H16: Housing Densities within 'Low Density Residential' Lands. Densities lower than 35-50 units per hectare will be considered on lands identified as 'Low Density Residential' on the land use zoning map.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	Limited relationship between environmental protection objectives and policy 16.
H17: Mix and Type of Units Proposals for residential development will be required to provide a mixture of house types and sizes in order to reasonably match the requirements of different household categories within the Plan area, including those groups with particular special needs. The Councils will seek to achieve a balance of housing stock to meet the needs and aspirations of the people residing within the Plan area.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy 17.
H18: Open Space in New Housing Schemes Multiple residential developments in general shall include a minimum of 15% of the overall site area reserved as public amenity area in accordance with the requirements set out below and the standards set out in the 'Development Guidelines & Technical Standards', in volume 2 of this plan. The provision of public amenity open space within new residential developments shall: a. Be conveniently located within the development, and designed as an integral part of the overall layout acting as a natural focal point that contributes to the visual enhancement of the development, and b. Be of a high quality design, providing for a multi function of uses, through the use of hard and soft landscaping techniques including equipped formal play areas, informal greens, furniture, paved and planted amenity areas, and c. Provide adequate lighting and signage, and highly accessible linkages with the surrounding public footpath network and other designated amenity areas, and d. Include a programme of maintenance.	√	√	√	√	√	0	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, and landscape
H19: Open Space in High Density Areas For multiple residential developments within the town centre and on brownfield sites (defined as any land which has been subjected to building, engineering or other operations, excluding temporary uses or urban green spaces), public open space shall be required at a minimum rate of 10% of the total site area where the proposal demonstrates that the quality of the development is significant.	√	√	√	√	√	0	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, and landscape
H20: Landscaping New residential developments shall provide landscaping to provide screening, enclosure, shelter, and acoustic barriers to enhance the overall visual/environmental impact of the development. Detailed landscaping schemes shall be required with planning applications and will include: a. Species, variety, number and location of trees, shrubs and other features to be provided, and b. Proposals to retain and incorporate existing trees and hedgerows within the development (in accordance with Policy NE4, Part B, section 5.0 of this plan), and c. Programme of implementation of the landscaping scheme.	0	0	√	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	
H21: Car Parking New residential developments shall provide for adequate off-road car parking to facilitate the development in accordance with the standards set out in 'Development Guidelines & Technical Standards', contained at Volume 2.	0	0	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H21
H22: Housing Schemes and the Need for Education Facilities It is the policy of the Councils to monitor the need for education facilities within the plan area in the context of the ongoing implementation of the plan in partnership with the Department of Education and Science.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	
H23: Provision of social and Affordable Housing Proposals for residential development on lands zoned 'Primarily Residential' or for mixed use purposes shall be required to comply with the policies set out in the 'Housing Strategy' at Volume 2 of this plan so as to make adequate provision for social and affordable housing under Part 5 of the Planning & Developments Act 2000-2006.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H23
H24: Provision of Childcare Facilities Proposals for residential development shall be required to comply with the policies set out in the 'Childcare Strategy' at Volume 2 of this plan.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H24
H25: Sustainable Building Practices in new Housing Schemes In line with policy NE12, Part B, section 5.0 of this plan, the Councils will encourage and support housing scheme proposals that utilise sustainable building practices.	0	0	√	0	0	0	0	√	√	√	0	0	0	0	0	0	0	√	0	0	0	√	0	0	0	Significant beneficial impacts focused on soil.
H26: Residential Amenity It is the policy of the Councils both to protect the residential amenity of existing residential units and to promote design concepts for new housing that ensures the establishment of reasonable levels of residential amenity.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H26
H27: Sub-Division of Residential Property The Councils will permit development that involves the sub division of residential sites only where it can be clearly demonstrated that: a. The existing house is not part of an overall development and the proposal would compromise the original layout of which the existing house formed part thereof, and	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H27

Policy	Assessment of policies against environmental protection objectives																						Comment					
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<p>b. The curtilage of original dwelling is not subdivided by more than 50% by the proposal, and</p> <p>c. The footprint of the proposed dwelling would not exceed one third of the new curtilage, and no window of the new dwelling is within 4m from any curtilage boundary, and</p> <p>d. The proposal would not appear incongruous with the density, massing, scale, proportions, materials and overall design and character of the existing property and the character of the street scene and surrounding area; and</p> <p>e. The proposal would not adversely effect the visual and residential amenity of adjoining properties and the surrounding area or give rise to adverse transport or road safety effects and will provide an acceptable level of parking for every separately occupied dwelling, and</p> <p>f. The proposal would not reduce the provision of adequate private amenity space for the existing dwelling and will provide sufficient private amenity space for any new separately occupied dwelling(s).</p> <p>The Councils shall not normally permit development of backland sites (e.g. those in back gardens which do not have road frontage) on the grounds of character and amenity.</p>																												
<p>H28: Conversion of Dwellings to Flats Proposals for the conversion of a building into flats or the conversion of existing large flats into smaller units will normally be permitted, provided that:</p> <p>a. The building/site is capable of accommodating the additional residential amenities and avoids over-development; and</p> <p>b. The proposal would not hinder traffic movement or prejudice the safety of road users or pedestrians; and</p> <p>c. The proposal includes amenities comprising refuse disposal facilities, drying areas and access to private outdoor amenity space; and</p> <p>d. The proposal is for self-contained flats; and</p> <p>e. Where appropriate, the proposal shall include convenient and adequate off-street car parking that integrates with the neighbouring properties.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H28.
<p>H29: Extension to or Refurbishment of a Residential Dwelling Proposals for extension to a dwelling will be permitted if all of the following criteria are met:</p> <p>a. The development reflects and respects the scale and character of the dwelling to be extended and its wider settlement;</p> <p>b. Provision is made for an adequate and safe vehicular access and parking; and</p> <p>c. The proposal would not adversely affect the amenity of adjoining properties.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H29.
<p>H30: Use of Upper Floors Above Commercial Premises For Residential Accommodation. Proposals for the re-use of upper floors above retail and commercial premises within the plan area for the purposes of residential accommodation will be permitted where it can be demonstrated that:</p> <p>a. The development does not prejudice existing commercial activity or result in the loss of residential amenity; and</p> <p>b. The development creates suitable pedestrian and vehicular access arrangements.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H30.
<p>H31: Change of use of residential properties. It is the policy of the Councils that proposals for change of use from residential to commercial, within established residential areas, will not normally be permitted. This policy does not apply to 'Home-based employment', policy E5 refers.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy H31.

Social & Community Infrastructure

Policy	Assessment of policies against environmental protection objectives																								Comment		
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Objective: To provide for the integration of social and community facilities within new residential neighbourhoods.	0	0	√	√	√	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To provide for social inclusion by ensuring ready and equal access to the range of social and community facilities.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To reserve land for community and institutional, cultural, recreational and amenity purposes.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To reserve land for educational purposes which may include ancillary recreational and childcare facilities.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To provide a co-ordinated and graded system of linked parks, open spaces and outdoor recreation areas which provide a range of active and passive open spaces for all sectors of the community resulting in a 'necklace' of high quality open space.	√	√	√	√	√	√	√	0	0	0	√	0	√	0	0	0	√	√	√	√	√	√	√	√	√	√	
Objective: To protect and improve quality and amenity value of existing open spaces.	√	√	√	√	√	√	√	0	0	0	√	0	√	0	0	0	√	√	√	√	√	√	√	√	√	√	
Objective: To identify valuable natural open space resources, landscape settings and other opportunities to develop new open spaces and recreational facilities that will provide for the incremental growth of the town.	√	√	√	√	√	√	√	0	0	0	√	0	√	0	0	0	√	√	√	√	√	√	√	√	√	√	
CF1: Provision of Health Services It is the policy of the Councils to work in partnership with the Health Service Executive in supporting and delivering the existing and future growth and expansion of health care facilities in Letterkenny together with affordable housing. In doing so, development proposals will be permitted for the provision of new, or extensions to existing, health facilities with a particular focus on Letterkenny General Hospital provided that the proposal: a. Would not have a significant detrimental impact on amenity of nearby occupiers; and b. Provides adequate access and parking facilities; and c. Supports existing or planned public transport network; and d. Establishes safe links for pedestrian and patient movement; and e. Would not have a detrimental impact on identified 'Protected Structures' or Historic Buildings/Groups of Buildings'.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF2: Development within the 'Strategic Community Opportunity.' On lands identified as 'Strategic Community Opportunity' on the land use zoning map, the Councils will seek to achieve a mix of health, social and community development which may include hospital expansion, community health, childcare facilities, affordable housing, community support housing. Any other use not identified herein will be considered on its own merits against the objective of establishing an area of integrated community provision that will provide benefits in terms of community development or health provision or social inclusion.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF3: Provision of Residential Care Homes Proposals for Residential Care Homes and Nursing Homes will be permitted where it can be demonstrated that: a. Adequate car-parking is provided for residents, staff and visitors; and b. Sufficient private open space is provided for residents; and c. They would not significantly detract from the amenity and character of the surrounding area.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF4: Provision of Childcare Facilities The Councils will encourage and promote the provision of high quality childcare facilities throughout identified neighbourhoods, within, adjacent to, or in close proximity to education establishments, existing community facilities, employment areas, primary traffic routes, and existing residential areas in order to facilitate localised provision of and increased accessibility to childcare facilities, and sustainable development in accordance with the Childcare Strategy contained at Volume 2 of this plan. The Councils shall establish a system of monitoring the achievement of the provision of childcare facilities in the locations set out above. Neighbourhood centres may be identified and used for the provision of childcare facilities where the Councils consider it more appropriate to cater for a wider area. Proposals for new childcare facilities will comply with the standards set out in the Childcare Strategy contained at Volume 2 of this plan.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF5: Provision of Educational Facilities The Councils will seek to work in partnership with the Department of Education and Science in the delivery of new primary and post primary educational facilities in line with the growing needs of the town.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF6: Overdevelopment of existing school grounds The Councils will support the Department of Education & Science in planning ahead for the provision of new school facilities however, extensions to existing schools or the provision of increased portable accommodation within school grounds for the purpose of accommodating increased student numbers, will only be permitted where the development would not lead to the loss of play/sports or car parking areas; would not be detrimental to the amenity of adjoining properties, or would not otherwise constitute a traffic hazard (as the result of the increased number of vehicles and associated turning movements generated by the proposed development).	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF7: Letterkenny Institute of Technology The Councils will support the continued growth and expansion of the Letterkenny Institute of Technology including the Mission and Vision set out in the Letterkenny Institute of Technology's Strategic Plan and including business development/incubation projects that are associated with the Institute subject to the following: a. That any new development is of a high quality and innovative architectural design that will represent landmark buildings to identify this important site. b. That any new development located on the Port Road side of the campus will be of a density that both maximises the site size and that provides for a Gateway entrance to the town whilst elsewhere on the site, new development will not impact negatively on residential amenities. c. That any new development makes provision for permeability, ease of access and provision of appropriate infrastructure that will support walking, cycling and public transport.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.

Policy	Assessment of policies against environmental protection objectives																								Comment			
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d. That any new development will not give rise to unacceptable transport or environmental effects. e. That proposals to integrate relevant social infrastructure, such as childcare, will be encouraged.																												
CF8: Letterkenny Institute of Technology 'Strategic Future Zoning.' It is the policy of the Councils to support the long-term strategic growth of Letterkenny Institute of Technology by identifying lands for 'Strategic Future Zoning' to provide for the incremental growth of the existing campus over a long term period.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF9: New Recreation, Leisure and Community Facilities. Proposals for recreation, leisure and community facilities and extensions, conversions and reuse of existing facilities for recreation, leisure and community activities will be permitted where it can be demonstrated that such facilities will: a. Be accessible to local residents, pedestrians, cyclists and those with special mobility needs; and b. Not significantly detract from the amenity and character of the surrounding area; and c. Provide adequate access and parking facilities.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF10: Retention of Recreation, Leisure and Community Facilities. Development proposals for the change of use of a recreation, leisure or community facility will only be permitted where the applicant can demonstrate: a. That there is insufficient local demand for the existing facility; or b. That an alternative replacement facility of equal or greater community benefit is to be provided for the respective area.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF11: Existing open space The Councils will seek to improve the quality and scale of the existing open space so that open spaces are well designed, attractive to use, safe, and adequately serve the needs of the demographics in the plan area.	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy CF11
CF12: Protection of existing open space It is the policy of the Councils to protect land of recreation and open space value in order to ensure the provision of sufficient lands and amenities for the use and enjoyment of the public. There will be a presumption against development on open space unless an assessment has been undertaken which clearly shows that the land is surplus to requirements or is not functioning properly due to its scale, location or layout or where there is some significant community gain from its development for other recreational or community purposes.	√	√	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape.
CF13: The Provision of a Graded and Coordinated System of Parks The Councils will aim to deliver a hierarchy approach through the grading and co-ordination of a system of parks so as to provide a balance in the variety and choice of active and passive open spaces within the plan area which can be enjoyed by all sectors of the community.	√	√	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape
CF14: New Districts Parks and Neighbourhood Parks The Councils will aim to achieve a greater supply of district parks as indicated on map no 3, 'Neighbourhood Strategy- New Neighbourhood Structure' by working in partnership with other agencies, voluntary groups and individuals so as to bring forward opportunities to improve access to District Parks throughout the plan area.	√	√	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape
CF15: Pocket Parks New applications for residential development will be required to make provision for 'pocket parks' as part of the overall design statement and concept proposal that are integrated within the overall layout and accessible by means of identified walkways/ linkages from residential properties and in line with policies H8, H9 and H10, H18 & H19.	√	√	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape
CF16: A 'Necklace' of Open Spaces. The Councils will identify and encourage links between open spaces (a 'necklace' of open spaces) that particularly benefit wildlife and biodiversity and that facilitate access to open space. In identifying a network of open space the Councils will identify some spaces within the network with limited access to provide a haven for wildlife habitats and to achieve a balance between people and animals.	√	√	√	√	√	0	0	0	0	0	√	0	0	0	0	0	0	0	0	0	√	0	0	√	0	√	√	Significant beneficial impacts focused on population and human health, biodiversity, fauna and flora and landscape
CF17: Walkways/Cycleways The Council will encourage the provision of new high quality walkways and cycleways and the upgrading of existing networks to and within open spaces to ensure that they are safe accessible and attractive to use.	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
CF18: Management and Maintenance of Open Space Developers will be required to make suitable provision for the adequate completion of open space areas and for the future management and maintenance of open space. Management regimes shall be set up to take on future maintenance responsibilities, which can take the form of Development Trust or a Management Company.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy CF18
CF19: Financial Contributions in lieu of open space The Councils will consider a Special Development Contribution to provide for a financial contribution in lieu of open space provision where considered expedient by and at the absolute discretion of the Council such contribution being held solely for the purpose of the acquisition/provision of open space and/or recreational, amenity or community facilities located in the neighbourhood in which the proposed development is to be located.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy CF19.
CF20: Cemeteries & Burial Grounds The Councils will facilitate identification of, and support in principle, provision of cemeteries within the Plan Area.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy CF20

Natural Environment

Policy	Assessment of policies against environmental protection objectives																								Comment	
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Objective: To protect, manage and enhance the natural environment and ensure that environmental and ecological issues are considered in all areas of development.	√	√	0	0	0	0	√	0	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	√	
Objective: To integrate natural environment and recreation facilities to form a combined resource.	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	
Objective: To protect areas within Environmental Designations, such as NHA's, SAC's, SPA's.	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	
Objective: To encourage the use of and access to the Natural Environment where appropriate	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To raise awareness and improve practices in relation to nature conservation by promoting the development and implementation of codes of best practice in partnership with other relevant agencies in line with the County Heritage Plan and Biodiversity Plan for Donegal.	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	√	√	
Objective: To provide appropriate policy framework in relation to archaeology.	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To provide a framework to protect against flooding.	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	0	
NE1: SAC, SPA, NHA and associated adjoining lands. Lands identified as 'SAC, SPA, NHA & associated adjoining lands' on the landuse zoning map have been designated as such under European and National legislation or are intrinsically linked to such a designated area. In these areas there shall be a general presumption against development. Development on such lands shall only be considered where all of the following criteria can be met: a. There is significant and identifiable public interest in doing so; and b. There is no direct or indirect adverse impact on the environmental attributes of the site as set out in the individual site synopsis relating to each designation (Volume 3, Environmental Report refers); and c. The proposal shall harness the ecological, environmental, aesthetic and biodiversity value of the site in a balanced manner that will not be harmful to the natural environment; and d. Adequate mitigation measures are put in place.	√	√	√	0	0	0	√	0	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	
NE2: Local Environment It is the policy of the Councils to limit new development within areas identified as 'Local Environment' to limited residential development of single housing only so as to ensure minimum negative impact on: a. The landscape setting i.e. The proposal must demonstrate that the development will not be an obtrusive and dominant feature within the landscape but rather that the development must be of a design form and scale that can be integrated comfortably into the landscape utilising and retaining key landscape features such as trees, hedgerows. b. The biodiversity quality of the area where existing habitats are of a significant level of biodiversity (Map No 1 contained in Volume 3, Environment Report, 'Biodiversity' at back of Volume 1 refers). The Councils will not permit multiple residential developments within 'Local Environment' (i.e. 2 or more units). In addition, where the cumulative impact of single houses is such to be resulting in a piecemeal and haphazard proliferation of single housing, permission will not be forthcoming.	√	√	√	0	0	0	√	0	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	
NE3: Protection of Trees The Council will encourage development proposals that enhance the landscape through positive management and additional planting of native trees. Proposals for development will not be permitted where it is considered that it will result in the destruction or significant damage to any tree, or stand of trees, which makes a significant contribution to the ecology, character or appearance of the area.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
NE4: River Swilly and Environs The Council seek to improve the quality of the River Swilly environment as a wildlife corridor and to provide for improved pedestrian/ cycle access to the river.	√	√	√	√	√	0	√	0	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	0	0	
NE5: Biodiversity The Planning Authority shall have regard to the established level of biodiversity identified in the map entitled 'Biodiversity', by requiring that development proposals do not detract from the important biodiversity features that have been identified in the study.	√	√	√	0	0	0	√	0	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	
NE6: Water Quality Management Proposals for development are required to have regard to the quality and quantity of water resources. Development will only be permitted where it can clearly be demonstrated that there will be no direct or indirect damaging effects on water resources.	√	√	√	0	0	0	0	0	0	0	√	√	√	√	√	0	0	0	0	√	0	√	√	0	0	
NE7: Protection of Archaeological Sites and Places Proposals for development which are likely to have an adverse impact, damage, interfere or destroy any recorded monuments and their setting and zones of archaeological potential will only be permitted where it can be clearly demonstrated that: a. An archaeological assessment has been conducted; and b. The scale and the quality of any proposed development or other material considerations outweigh the value of the remains in question; and c. Proposals for the conservation and management of archaeological resources have been included; and d. There will be no destruction of recorded monuments	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

Policy	Assessment of policies against environmental protection objectives																				Comment						
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	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5		6	1	2	1	2	
NE8: Flood Risk Management The Council will pursue a managed risk approach to flooding in the Letterkenny area and will be guided by the precautionary principle. The development plan will: <ol style="list-style-type: none"> Direct development considered of 'high risk' to public safety, away from vulnerable locations; Specify the criteria against which new development will be managed within areas within the settlement boundary below the 6m contour line; Safeguard floodplain areas and low lying land within the town from inappropriate development and ensure, where possible, that they can flood naturally, Identify proposals for new flood protection measures where development occurs; To is to encourage the use of sustainable urban drainage systems (SUDS) in the management of surface water runoff in all new development. 	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	√	0	0	√	0	0	
NE9: Flood Risk Assessment The Councils will manage flooding through the assessment of flood risk as follows: <p>i. High Risk Exclusions: The Councils will direct developments considered of 'high risk' away from sites that fall below the 6m contour line (Malin OD) and will refuse applications for such proposals that fall within such areas. Proposals will be considered of high risk if they:</p> <ol style="list-style-type: none"> Represent an unacceptable threat to public safety or public health, (for example, cannot be evacuated in an emergency, and constitute a risk to human life); or Are likely to cause unacceptable levels of pollution or contamination of flood waters if inundated. Examples of developments considered as 'high risk' would include, hospital, medical and emergency services; special care residential developments for the physically impaired or elderly; commercial developments that involve polluting or contaminating processes or materials e.g. sawmills, chemicals, acids, or fuel storage. Developments that if flooded would cause risk to others: for example electricity sub stations. <p>ii. Managed Risk Proposals The Councils will seek to manage the threat from flooding for developments not considered as 'high risk'. Within this approach there is an acceptance of risk on the basis that developments must adopt appropriate protection and mitigation measures and have the potential to make a contribution to the improvement of floodwater management within the area at risk. Proposals will only be considered where it can be demonstrated that the development:</p> <ol style="list-style-type: none"> Has been designed to minimise the risk of surface water inundation and will not contribute to or increase the risk of surface water flooding elsewhere; and Has adopted all reasonable measures to improve the management of flood waters on and adjacent to the site and to assist the protection of properties within the vicinity of the site; and Incorporates building design measures and materials to assist evacuation and minimise damage from inundation. <p>iii. Supporting Information The Councils may request supporting information to substantiate the adequacy of design/mitigation proposals for development at risk, or likely to cause risk elsewhere. This information will normally be required in the form of a hydrological report which in addition to addressing the issues raised in paragraph (ii) above, may be required to include the following information:</p> <ol style="list-style-type: none"> Indicate the location, route and destination of culverts, channels and storage areas to accommodate surface water discharge from the proposed site to a suitable outfall. Include surface water design calculations establishing the adequacy of the proposed surface water drainage between the site and the proposed outfall to facilitate the proposed development and that has cognisance to the 50-year storm. These details shall be accompanied by the result surface water network and proposed outfall; Include a programme of maintenance for the upkeep of storm water drainage and flood storage areas from the proposed site to the proposed outfall; Provide details of proposed uses of the development/structure below the 6m contour line. <p>Only appropriate uses that would not adversely be affected by temporary inundation will be considered acceptable within areas considered to be at risk to flooding.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	√	0	0	√	0	0	
NE10: Flood Defence Requirements Where development is proposed in proximity to the River Swilly or its tributaries, proposals shall clearly demonstrate: <ol style="list-style-type: none"> The preservation of an undeveloped 20m buffer on either embankment of the river Swilly and an undeveloped 10m buffer to either side of the major tributaries to the Swilly with public access reserved for emergency and service vehicles. The provision of additional storage areas to cater for the possibility of breaching or overtopping of the Swilly or tributary embankments. 	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	√	0	0	√	0	0	
NE11: Surface Water Management Where it is considered that the existing surface water drainage may be unable to accommodate an additional discharge generated by proposed development(s), the Councils will require the submission of surface water design calculations establishing the suitability of drainage between the site and a suitable outfall. The Councils will promote and may require in certain circumstances, the use of Sustainable Urban Drainage Systems (SUDS) as an alternative to surface water run-off to existing drainage systems and water courses. Circumstances where the Councils will require the use of Sustainable Urban Drainage Systems is in relation to lands located within the Flood Risk Area identified on the Land Use Zoning Map excluding the Town Centre.	√	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	√	0	0	√	0	0	
NE12: Sustainable Building Practices. The Councils will encourage and support the use of renewable technologies and sustainable building practices in all residential and non-residential developments and actively facilitate the continual development of renewable technologies with regard to residential amenities and landscape sensitivities.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	√	√	√	0	√	0	0	0	√	√	√	Significant beneficial impacts focused on air, climate, noise and landscape.

Employment, Enterprise & Economic Development

Policy	Assessment of policies against environmental protection objectives																						Comment			
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	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1		2	1	2
Objective: To act on and promote the designation of Letterkenny as a Linked Gateway with Derry in the NSS 2002-2020 and their strategic roles of attracting inward investment, enterprise and employment creation within the Northwest of Ireland.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To zone sufficient land to allow for the creation of employment, enterprise and the economic development of Letterkenny.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To promote the creation of sustainable employment within Letterkenny.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To create an efficient working environment with employees in mind, allowing for the provision of necessary day-to-day facilities and services.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: To concentrate the service industry within the town centre and to promote the development of the town centre having regard to the Retail Strategy (Volume 2) and Town Centre Policies as set out in Part B, section 7.0	0	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
E1: Employment Location and Land Supply It is the policy of the Councils to zone land for the purposes of employment creation, economic development and enterprise. Proposed developments that will create sustained employment and economic benefit will be appropriate in the following land use zonings: - a. Lands zoned for general employment; and b. Lands zoned for commercial uses; and c. Land with established employment generating uses; and d. The Town Centre Consideration will also be given to proposals in areas other than those mentioned where it can be demonstrated that there are no other sites available within land zoned for employment generating development purposes that can accommodate the proposed development. Any development proposal of this nature should be in accordance with the other policies of this plan and should not affect the amenity of the area in which it is proposed.	0	0	√	0	0	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative affect in relation to the preference in the re-using of brownfield lands and regenerating the town centre in the general zoning of employment location and land supply.

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<p>E2: Developments in 'General Employment' zones. In land zoned for General Employment or extensions to existing employment generating development, proposals will be permitted provided that: -</p> <p>a. They are appropriate to the respective area in terms of size and the type of employment generating development to be provided; and b. They would not cause adverse transport effects to the safety and free flow of traffic on the surrounding road network; c. They would have no significant adverse environmental effects on the character of the surrounding area or on the amenity of adjacent and nearby occupiers; and d. Comply with the Major Accidents Directive as set in Policy P110.</p> <p>Proposals will also be considered for developments within the general employment zones, which contribute to the creation of a sustainable working environment. The provision of services ancillary to industry and business including day to day facilities including childcare facilities and cafes will be acceptable in conjunction with policy E3.</p>	0	0	√	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in developments in general employment zones
<p>E3: Other Uses On General Employment Land Designated general employment zones are primarily reserved for enterprise, general industrial and storage and distribution activities. Activities that do not fall within these categories will be considered in relation to their suitability to the location concerned, including the supply of available land. In the context of creating sustainable working environments, the Councils will also consider the use of General Employment lands to cater for the day-to-day need of working life, including cafés and childcare facilities and will support the creation of a vibrant business district. Proposals for development other than for business, commercial, general industrial, storage and distribution uses within identified general employment zones will only be considered where it can be clearly demonstrated that:</p> <p>a. They do not give rise to adverse environmental impacts; and b. They do not compromise the provision of a sufficient supply of general employment land for employment generating activities within the plan area; and c. Where the proposal is for retail uses they are ancillary to a permitted zoned use. d. Proposals for residential developments on land zoned general employment will not normally be permitted.</p>	0	0	√	0	√	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre.
<p>E4: Developments in 'Commercial' zones Lands zoned 'Commercial' within the plan have been designated as not being able to support industrial uses. These zones are more suited to commercial uses that generate employment but that are less intensive than industrial development proposals and are located along key arterial transport corridors, which are highly accessible. The Councils will support proposals that generate sustainable employment within these lands. The Councils do not view these lands as being capable of supporting heavy industries. All other employment creating development proposals within this zoning will be considered on the basis that: -</p> <p>a. They would not cause adverse transport effects to the safety and free flow of traffic on the surrounding road network; b. They would have no significant adverse environmental effects on the character of the surrounding area or on the amenity of adjacent and nearby occupiers; and c. They will provide for a design and form that responds to the location of the lands as key landmark sites marking the commercial entrances into the form; and d. Comply with the Major Accidents Directive as set in Policy P110. e. Provide for a proposed design that is of innovative architectural form in the context of the location of these lands at the entrance Gateways to the town.</p> <p>Proposals will also be considered for developments within the commercial zones, which contribute to the creation of a sustainable working environment. The provision of services ancillary to retail and business including day to day facilities including childcare facilities and cafes will be acceptable in conjunction with policy E3.</p>	0	0	√	0	√	√	0	?	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in developments in commercial zones
<p>E5: Home-Based Employment Proposals for development which involve change of use or new development for purposes of home-based employment will be permitted where it can be clearly demonstrated that:</p> <p>a. The proposal is of an appropriate scale for its location; and b. The proposal will not give rise to adverse visual aspects or negatively impact adjoining uses, traffic safety, and environmental or residential amenity.</p>	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	
<p>E6: Tourism Related Development The Councils will promote and support the establishment of a new landmark visitor facility on lands by the banks of the River Swilly, within the identified Town Centre area. The proposal will be linked to the leisure and recreational development of the riverside area.</p> <p>Proposals for new or extended tourism related development elsewhere within Letterkenny will be permitted subject to:</p> <p>a. Integration with existing holiday/tourism facilities; and b. Access through a variety of means of transport; and c. Car parking proposed in accordance with the standards established in the Plan; and d. Safe vehicular access to and from the highway; and e. Adequacy of access roads for the likely levels of traffic generated by the proposal; and f. There will be no adverse impact to any conservation interest, heritage interest, landscape or residential amenity; and g. Appropriate design that takes into account size, scale and materials of existing facilities; and h. The submission of a management scheme for the maintenance of the overall development including roads, footpaths, open spaces and services.</p>	0	0	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	√	√	Significant beneficial impacts focused on population, human health and landscape.
<p>E7: Visitor Accommodation Proposals for holiday accommodation, including touring caravan and camping sites, will in principle be supported throughout the plan area. Proposals for visitor accommodation will be permitted where they can clearly demonstrate:</p> <p>a. That the proposal does not give rise to adverse visual impacts, or negative impacts to traffic safety, environmental or residential</p>	0	√	√	0	0	0	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in

Policy	Assessment of policies against environmental protection objectives																								Comment				
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amenity; and b. Adequate landscaping measures to integrate the site into its setting; and c. Design and layout to make use of site topography and layout; and d. That the proposal does not prejudice existing provision or local amenity.																												proposals for holiday accommodation.	
E8: E-Commerce It is the policy of the Councils to support E-Commerce as a sustainable source of employment. The Councils will aim to promote and improve the existing broadband infrastructure, which is key in the creation and sustainability of E-Commerce. The Councils recognise that E-Commerce may not necessarily require a shop frontage and as such would be sustainable in business parks and lands zoned for general employment. As such proposals for developments predominantly associated with e-commerce will be permitted provided that: - a. The proposal is of an appropriate scale for its location; and b. The proposal will not give rise to adverse environmental and transport effects or be prejudicial to residential amenity.	0	0	√	0	√	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in proposals for E commerce.		
E9: Opportunity Sites The Opportunity Sites identified on the land use-zoning map offer a unique development opportunity by reason of their strategic location, scale, nature or current use. The planning frameworks set out for each 'Opportunity Site' on the following pages shall form a guide to the type of development that may be appropriate at each location. Any specific proposal that is not referred to in the planning frameworks shall be considered on their own merits subject to the constraints identified in the planning frameworks and subject to the proper planning and sustainable development of the area.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy E9.		
OPP 1: Extension to Town Park at Gortlee: This site, bounded by the Town Park, DeValera, Ramelton and Gortlee Roads, and Whitethorn housing developments, comprises one of the few remaining significant woodlands within the town. The woodlands cover some 16ha of land stretching up to the Town Park. Within the woodlands there are a number of large open spaces, which are difficult to access. The site and the setting of Gortlee House are major environmental assets to the town. The Councils consider that this site has the potential to be sensitively developed for a mix of uses and the concept for developing the site will demonstrate the following elements: a. That the site is developed as a town park campus, retaining the substantive woodland cover of the site and providing for discrete pockets within which buildings can be introduced into an extended parkland setting; b. That pre- planning consultation be carried out with the Planning Authority; c. That the proposal provides for an extension of the existing town park linking through to Gortlee Road and providing for the conservation of the existing mature woodland cover with full public access. The substantive areas of new parkland space must be contiguous with and adjacent to the existing town park; d. The setting of Gortlee House is safeguarded when considered both within the confines of the site and from views into the site. In particular, no development will be permitted that curtails views to the house from the de Valera Road and from the junction of Gortlee and Ramelton Roads; e. Uses exclude mainstream retail, and are compatible with the environmental setting of the site: e.g. specialist residential, apartments, offices, tourism or institutional uses may be appropriate; f. A high standard of architectural quality is achieved throughout having regard to the nature of the site as an important landmark site. In addition, density within the site will be carefully considered having regard in particular to the heritage value of Gortlee House and the wooded nature of the site; g. Vehicular access to the development is achieved via a new access improvement on Gortlee Road, subject to engineering and road safety assessment. Proposals to access the site from De Valera Road will only be considered where a clear justification is demonstrated together with evidence of minimal impacts with the town park, and subject to adequate and appropriate engineering and road safety both within the site and outside the site. h. Pedestrian and cycle access will be required to link through the development connecting the Town Park, De Valera Road, Gortlee Road and the Whitethorn housing area. i. The public parkland areas are served by footway and cycleway access, street lighting and park furniture as required by the Town Councils and provided by the developer. The Councils will consider the adoption and maintenance of all public spaces and woodlands on the basis that title is transferred to the local authority at completion of the development.	√	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	x	√	Significant beneficial impacts focused on population and human health. Potential negative affect on natural and historic landscape.
Opp 2: Gortlee This site is located along Gortlee Road where there is substantial residential development, the Church of the Irish Martyrs and a range of industrial and employment generating activities to the north of the site. This site presents an opportunity to integrate the conflicting uses of residential and General Employment by creating a buffer between the housing to the west and the General Employment to the East together with the development of the site as a neighbourhood centre supporting a mix of small local retail units and community services so as to enhance on the existing established neighbourhood amenities.	0	0	√	0	√	√	0	?	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre in relation to developing this opportunity site		
Opp 3: Donegal Creameries Site The Donegal Creameries site is located on the edge of an established residential area and adjacent to 'General Employment' land use and zoning. The location is a transitional area between differing land uses and therefore any development proposal must give consideration to the creation of a buffer between the 'Residential' and 'General Employment' lands and have due regard to the protection of residential amenities. Notwithstanding, it is recognised that existing uses on the site are long established in the form of Donegal Creameries retail store and garden centre facility, associated offices, car parking facilities and the disused factory building along the Ballyraine Road. The redevelopment of this brownfield site is supported by the Councils for commercial, residential, tourism/leisure and small-scale retail uses with a maximum of 500m ² for any neighbourhood shop. Pedestrian access to adjoining undeveloped lands will also be required.	0	0	√	√	√	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Significant beneficial impacts focused on population and human health.		

Policy	Assessment of policies against environmental protection objectives																								Comment	
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Opp 4: Thom Pier & Landing Stage The site, which has a frontage onto the Swilly, is within a number of environmental designations such as SAC, SPA and it is also within the flood zone and adjacent to zoned green space. Subject to the amenity considerations related to the above and to adequate access arrangements, infrastructure and community considerations, the site could be the subject of a carefully designed Waterfront Regeneration Project introducing a number of appropriate commercial tourism/leisure uses. The Council would welcome the submission of a detailed design brief in regard to the site.	?	√	√	0	0	0	0	0	0	0	?	0	0	?	0	0	0	0	0	0	0	√	?	0	√	Potential negative affects on biodiversity fauna and flora and water. Also a potential negative affect in relation to flood risk and developing areas in the flood plain.
Opp 5: Former Town Port The site occupies a prime gateway position into the town and has potential to represent a landmark development that reflects the Linked Gateway status of Letterkenny- Derry. At present, this gateway entrance is represented by the views of the art structure at Port roundabout, the tourist office building and also the Mount Errigal Hotel. Given the location of the site adjacent to the Swilly, proposals providing for commercial tourism/leisure facilities are considered appropriate. In this regard, development proposals shall demonstrate: a. That the proposal is of high architectural design including high quality internal and external specification, and that is of an architectural form that will represent a landmark quality structure at this key Gateway to the town. b. That the development addresses the river and integrates the river corridor into the design concept providing for public realm/ amenity space. c. That any proposal must make provision for flood alleviation and flood risk management in line with policies NE9, NE10 and NE11.	0	√	√	0	√	0	0	√	0	0	?	0	0	0	0	0	0	0	0	0	0	√	?	√	√	Significant beneficial impacts focused on material assets, cultural heritage and landscape. Potential negative impacts in relation to protecting and enhancing aquatic ecosystems and in relation to developing in flood plain
Opp 6: South of River Swilly The site is located south of the River Swilly. Proposals for redevelopment of these lands shall be required to consist of a detailed design concept that considers the integration of the proposed development with residential land (south) and town centre (north). In addition, the design concept shall: a. Demonstrate a range of uses in the areas of residential, apartments, tourism, offices and community uses. Mainstream town centre retail activities are excluded. In lieu, local neighbourhood retail activity serving residential development may be considered. b. Adequate provision of open space, public realm, pedestrian and cycle permeability. c. High quality architectural design d. Consideration of flood risk and associated mitigation measures having regard to the flood risk management policies contained in the plan. e. Consideration of further linkages and compatibility with residential lands south and the town centre north.	0	√	√	√	√	√	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	x	0	0	Significant beneficial impacts focused on population and human health. Potential negative affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre and in relation to developing on flood plain.	
Opp 7: South of Swilly The lands in question are located to the south of the River Swilly and the 'Town Centre'. The lands adjoin the River Swilly and consist of an existing walled graveyard whilst a proposed new bridge and proposed road alignment traverse the site. Having regard to the environmental and infrastructural issues arising, a masterplan approach to the development of these lands will be required. The overriding objective of the masterplan is to ensure a balanced approach to the development of the lands in terms of the delivery of appropriate scale and built form set against the delivery of integrated and substantive open space proposals in the form of linkages, corridors and parkland space. Furthermore the masterplan will be required to include: a. A mix of uses that will exclude mainstream town centre retail activity but may include residential, apartments, offices, tourism or institutional uses. b. The adequate provision of public open space both along the river corridor and within the overall site that provides for a high quality environment where access and permeability are paramount. c. Open space provision within the masterplan area will accommodate a graveyard and pedestrian river crossing. d. The provision of adequate buffer areas around the existing walled graveyard in such a manner so as to protect the integrity, context and setting of the graveyard whilst incorporating the buffer area within an overall open space concept for the site. e. Consideration of flood risk and associated mitigation measures having regard to policies NE9, NE10 and NE11. f. Consideration for further linkages and compatibility with residential lands south. g. Integration of the road and bridge structures in a manner that makes provision for a design and engineering concept that shall cause the structures to contribute positively to the strategic location of the site, to the open space/public realm concepts and to the setting of the walled graveyard.	0	√	0	0	0	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	x	0	0	Potential negative affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre and in relation developing on flood plain.	
Opp 8: Oldtown Oldtown is well located in relation to the town centre, but is located within and adjacent to the Swilly Flood Buffer zone. This site represents an opportunity to provide a neighbourhood centre supporting some small local convenience retail, childcare and play facilities and other community services that would serve the Oldtown residential area.	0	0	√	0	√	0	0	?	0	0	0	0	0	x	0	0	0	0	0	0	0	x	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre. It also has potential negative affect in relation to developing on flood plain.	
Opp 9: Lands at Crieve to the south of the River Swilly. This area of land at Crieve represents an opportunity to consolidate both the established Oldtown residential area to the immediate southeast and the town centre area to the north. The site is bounded by the river Swilly to the north giving rise to significant flooding implications as the site is located within the flood risk area and proposals for development must demonstrate adequate flood protection measures and that there will be no contribution to or increase in the risk of flooding elsewhere. In addition, the use of Sustainable Urban Drainage Systems must be considered as part of any proposal. Uses will exclude mainstream retail and only be permitted where they are compatible with the environmental setting of the site e.g. specialist residential, apartments, offices or tourism. Any proposal will have due regard to the route of relief roads.	0	0	√	√	√	0	0	x	0	0	0	0	0	0	0	0	0	0	0	0	0	x	0	0	Potential negative and positive affects in relation to the preference in the re-using of brownfield lands and regenerating the town centre. It also has potential negative affect in relation developing on flood plain.	

Policy	Assessment of policies against environmental protection objectives																						Comment			
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Opp 10: Former Mart, Sentry Hill The site of the former mart is located in an area where education, religious and recreational facilities are clustered as well as a substantial level of high-density residential development. Having regard to the location of the site within walking distance of a range of community facilities and the town centre whilst having regard also to the significant associated car parking/traffic congestion, the former mart site would serve needs for social/affordable housing (particularly for the elderly in conjunction with the provision of an area for bus/coach parking for school and tourist use. In addition, any proposal for these lands will be required to reflect a high quality architectural design so as not to result in a negative affect to the character of the Cathedral 'Architectural Conservation Area'.	0	0	√	√	√	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	

Town Centre

Policy	Assessment of policies against environmental protection objectives																						Comment			
	B		P				S				W					A						M		L		
	1	2	1	2	3	4	1	2	3	4	1	2	3	4	5	1	2	3	4	5	6	1		2	1	2
Objective: Achievement of a critical mass of retailers within the existing town centre, and the expansion of retail activities thereafter in an incremental fashion.	0	0	√	0	0	0	√	√	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	
Objective: Provision for of a diversity of different retailing types (comparison and convenience) and sizes throughout the town centre.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: Creation of an attractive retail environment in terms of overall design and the quality of the public realm.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: Establishment of a strong and competitive retailing environment including a strong independent retailing sector.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	
Objective: Development of an integrated retail environment accessible by a range of transportation modes.	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	
TC 1: Adherence of Development Proposals to the Town Centre Strategy. All Development proposals shall demonstrate overall compliance with the town centre strategy detailed above. Proposals, which the Planning Authority consider would conflict with, or hinder the achievement of, this strategy, will not be permitted.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	0	0	
TC2: Adherence of Development Proposals to the Urban Design Framework Overall Requirement: All Development Proposals, within the Town Centre shall adhere to the Urban Design Framework (Map 6 refers) accompanying this Development Plan in terms of; development forms/layouts, the provision of street frontages/active frontages, building setbacks, the protection of existing and the provision of new linkages, the development of open spaces (including positively addressing and incorporating adjacent areas of open space within development proposals). Requirements within the Town Centre West of the Isle Burn/Isle Lane: In the area West of the Isle Burn/Isle Lane the Urban Design Framework identifies specific development forms/layouts, and linkages, including exact development blocks, block arrangements, active frontages and internal roadways/linkages. In addition to the overall requirements detailed above development proposals in this area shall adhere to the specific requirements of the Urban Design Framework in this regard. Notwithstanding this the Planning Authority may consider large scale development proposals in this area, which provide for alternative layouts in terms of block arrangements, internal linkages etc provided that the development proposal: <ul style="list-style-type: none"> Provides for a comparable grain of development in terms of the size of individual blocks. Creates a strong urban form with buildings, streets and places of a human scale. Provides for the creation of the key urban spaces identified in the framework. Achieves a similar density of development. Provides an equivalent level and quality of pedestrian permeability including providing for the major internal and external pedestrian linkages identified in the framework. Otherwise meets the specific requirements of Urban Blocks 1-4 as identified in Policies 20-23 Requirements within the Town Centre East of the Isle Burn/Isle Lane and in Urban Block 5 In the area East of the Isle Burn/Isle Lane and in Urban Block 5 the Urban Design Framework identifies more general development areas/layouts and more approximate road linkages and building setbacks. This allows for a more flexible approach in view of the Greenfield nature of the area. Notwithstanding these more general requirements, development proposals in this area shall be expected to provide for: <ul style="list-style-type: none"> The creation of distinct development blocks within an overall grid structure. A fine grain block and plot size (with block edges not greater than 80m in length). A strong urban form with buildings, streets and places of a human scale. Street Frontages and Streetscape along both the linkages identified in the Urban Design Framework and the edges of the blocks created within/by specific development proposals. → Such frontages shall provide for buildings to front directly onto the street with building setbacks only in so far as to accommodate sufficient space for footpaths, cyclepaths, kerbside parallel parking and (where appropriate) small areas of private space fronting residential developments. In exceptional cases a greater building setback will be permitted to accommodate suitably landscaped public open space or variations in setback to promote visual interest. An overall development density suitable for a town centre environment. Quality pedestrian linkages within the development and between it and the adjoining development blocks. Public spaces within larger development areas. 	0	0	√	0	√	X	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	√	0	0	0	

Policy	Assessment of policies against environmental protection objectives																						Comment					
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<ul style="list-style-type: none"> Active frontages along key sections of the street frontage in accordance with TC17. 																												
<p>TC3: Mixed Use Development Policy in the area identified as the Traditional Town Centre. New Developments, the redevelopment or the change of use of existing buildings or parts of same, in the traditional town centre shall demonstrate that the proposed usage shall not detract from the objective of creating a vibrant and mixed use town centre. In addition such uses shall be reflective of the development's/building's location within the town centre. Larger scale developments shall provide for a range of unit sizes capable of accommodating a diversity of types of retail, service and residential accommodation. This policy shall not apply to the development of buildings for a cultural, community or educational use.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy TC3
<p>TC4: Mixed Use Development Policy in areas other than the Traditional Town Centre. New Developments, the redevelopment or the change of use of existing buildings or parts of same, in the area zoned town centre extension, shall provide for a diversity of uses within the development/building in question. In addition, larger scale developments shall provide for a range of unit sizes capable of accommodating a diversity of types of retail, service and residential accommodation. This policy shall not apply to the development of buildings for a cultural, community or educational use.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy TC4
<p>TC5: Design Criteria in the Town Centre Development proposals in the town centre shall only be permitted where they:</p> <ul style="list-style-type: none"> Provide for distinctive buildings of high architectural quality, which contribute to a distinct sense of place and a quality public realm. Adhere to the building lines set out in the Urban Design Framework or where same is not identified adhere to the established building line. Provide for a fine grain of development in terms of overall scale, fenestration size/proportions, and detailing. Promote visual interest through modulation and detailing of architectural elements (e.g. variation in building elevations, variations in roof form, cornices, windows, eaves, frontages and entrances and minor variations in setback). Provides for a minimum 3-storey development along the Pearse Road and 2 Storeys elsewhere in the town centre. Avoids the use of industrial type cladding. Avoids the use the cladding or glazing of extensive areas of the proposed development. 	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Limited relationship between environmental protection objectives and policy TC5	
<p>TC6: The Ecclestial Quarter Architectural Conservation Area It is a policy of the Council to implement an Architectural Conservation Area, herein described as 'The Ecclesiastical Quarter ACA'. Accordingly it will implement the relevant policies at Part B, section 2.0.</p>																												
<p>TC7: Historic Streetscape It is the policy of the Councils to protect and enhance the quality of the 'Historic Streetscape' as identified on Map no. 6.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Limited relationship between environmental protection objectives and policy TC 7	
<p>TC8: Shop fronts along the 'Historic Streetscape.' It is the policy of the Councils to:</p> <ol style="list-style-type: none"> Ensure the retention of historic street-fronts as appropriate. Only approve alterations to existing historic shop fronts if the proposal is an improvement on what exists. Particular care will be taken over proposals for the installation of blinds, canopies, security grilles and shutters to avoid harm to the visual amenity of historic shopping streets, if acceptable in principle they must be designed as an integral part of the shop front design. Avoid pastiche shop fronts and facades. Encourage contemporary design resolution where appropriate avoiding cautious pastiche, considering security lighting and shutters, additional security measures as necessary, signage and advertisements. 	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Limited relationship between environmental protection objectives and policy TC 8	
<p>TC9: Traditional town centre It is the policy of the Councils to reinforce the traditional town centre as the heart of the town, to increase its vibrancy and improve its environment. (Map No. 5 Refers)</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Limited relationship between environmental protection objectives and policy TC9	
<p>TC10: High quality sustainable vibrant town environment It is the policy of the Councils to ensure the traditional historic streetscape of Letterkenny is preserved and enhanced to create a high quality sustainable vibrant town environment.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Limited relationship between environmental protection objectives and policy TC10	
<p>TC11: Promotion of attractive town centre It is the policy of the Councils to promote an attractive town centre atmosphere which would encourage additional trade and business to the traditional town centre encouraging increased footfall along the historic streetscape of the town.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Limited relationship between environmental protection objectives and policy TC11	
<p>TC12: Improvement programme It is the policy of the Councils to initiate a programme encouraging ongoing improvement in street fronts in order to attract more quality businesses to Main Street.</p>	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Limited relationship between environmental protection objectives and policy TC12	
<p>TC13: Management of 'Historic Streetscapes.' The Councils will manage the 'Historic Streetscape' (Map No 6 Refers) as follows:</p> <ol style="list-style-type: none"> All restoration and development proposals within the 'Historic Streetscape' will respect the character of existing buildings, important views and spaces and historic settlement pattern in terms of scale, height, density, grouping, design and materials along the designated Historic Streetscape and always of the highest design quality. Existing historic buildings adding to the character of the streetscape should not be damaged or demolished. There is a presumption in favour of the retention of historic buildings. The Councils will promote the sensitive re-use of existing buildings and encourage quality repair and maintenance carried out with appropriate materials and to a high standard of workmanship. The Councils will seek to retain all original features which are important to the character of the buildings along the Historic Streetscape such as entrances, chimney stacks, doors, windows and materials. The Councils will ensure all development within the designated historic streetscape should reflect and interpret the specific character of the streets, responding to and reinforcing the townscape, landscape, scale materials and topography, and always of the highest quality regardless of the conceptual approach adopted. The Councils will reinforce the value and importance of the green spaces in the town and the natural topography of the area in relation to the protection, enhancement and promotion of the 'Historic streetscape.' 	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	Limited relationship between environmental protection objectives and policy TC13	

Policy	Assessment of policies against environmental protection objectives																								Comment	
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g. All planning applications will be accompanied by a design statement clearly outlining the concept and design approach chosen in relation to the development of buildings and/or sites along the designated spine.																										
TC14: Landmark Buildings. Proposals for the development of new buildings or the redevelopment of existing buildings on the sites designated as Landmark sites on Urban Design Framework shall not be permitted unless they provide for a distinctive landmark building of high architectural merit in terms of design, character, materials and finishes.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	Limited relationship between environmental protection objectives and policy TC14
TC15: Protection of Short views and Prospects of Special Amenity Value. It is a policy of the Councils to protect the identified Views and Prospects of Special Amenity Value [Map No. 6 refers]. Developments, which obstruct, detract from or otherwise compromise the architectural character, setting, streetscape, or general visual harmony of the view in question, shall not be permitted	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	√	√	Significant beneficial impacts focused on landscape.
TC16: Protection/Enhancement of Key Linkages: Developments, which obstruct, narrow, physically encroach upon, otherwise restrict the safe use of the established or potential linkages identified in Map No 6: 'Urban Design Framework' shall not be permitted.	0	0	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0		
TC17: Provision of Active Frontage within the Town Centre. New development proposals, or the redevelopment of existing properties, in areas determined or considered by the planning authority to be 'active frontage' in the Urban Design Framework (map no.6), shall provide for the creation of an attractive, high quality urban environment that promotes commercial vitality and pedestrian amenity: a. Developments are built to the building line identified on the urban design framework. b. Buildings create a human scale and visually engaging façade by: i. The modulation and detailing of architectural elements (e.g. minor changes in sets backs, variation in roof lines, entrances, window detailing). ii. Ensuring that building forms along street frontages are broken down into narrow horizontal distances, which create a human scale and maintain visual interest. iii. The avoidance of large expanses of blank walls, or frontages exclusively devoted to display. c. The development, in combination with existing and permitted development in the immediate vicinity, provides for the occupation of ground floor units by a variety and mix of active uses (e.g. Convenience & Comparison Stores, Cafés, Restaurants) directly accessible from the street through the provision of a range of different unit sizes. In larger developments smaller units shall be interspersed with larger units. d. Buildings shall provide a minimum of two full storeys of useable floorspace along the full street frontage of the site. e. Car parking/loading spaces along the street frontage, where appropriate, shall i. Be arranged parallel to the street frontage, ii. Not amount to more than 50% of the overall street frontage. iii. Be grouped with an equal length of free kerbside between each group. f. With the exception of on street parking described above car parking, manoeuvring and loading areas shall be located, where appropriate, to the rear of buildings. Where it is not physically possible or desirable to locate parking to the rear of buildings or where the provision of same would not adhere to Point g. Above, the developer shall be expected to provide a Financial Contribution to the shortfall in Car Parking in line with the Technical standards contained within this plan and the applicable Development Contribution Scheme.	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	Limited relationship between environmental protection objectives and policy TC17	
Policy TC18: Provision of Car Parking in the Town Centre New development proposals, including proposals for the redevelopment of existing developments shall adhere to the following requirements in relation to the arrangement/layouts of car parking, manoeuvring and loading spaces. • With the exception of on street parking provided in the manner described below, car parking manoeuvring and loading areas, where appropriate, shall be located to the rear of buildings, or through alternative appropriate internal parking arrangements (e.g. basement or multi-storey parking) which do not hinder the creation of strong street frontage. • Car parking/loading spaces provided along the road/street frontage (i.e. to the front of buildings) shall: → Be arranged parallel to the street frontage. → Not amount to more than 50% of the overall street frontage. → Be grouped with an equal length of free kerbside between each group. • Where it is not physically possible or desirable to locate parking in accordance with the above provisions, the developer shall be expected to provide a financial contribution to the shortfall in Car Parking in line with the Technical Standards contained within the plan and the applicable Development Contribution Scheme. • In primarily residential developments within the town centre a more flexible approach shall be taken to application of the above parking policy. However in such locations, developments shall be expected to employ appropriate alternative solutions (e.g. small areas of grouped parking, basement parking, courtyard parking etc) in order to achieve a strong urban form in the design of such developments.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	Limited relationship between environmental protection objectives and policy TC18	
TC19: Location of Certain Types of Retail Development. Proposals for the development of new, the extension of existing, or the change of use of buildings to: Car Retailing Showrooms/Lots, Builders Merchants or large scale outlets predominately dedicated to the wholesale trade, will not be permitted within the area defined as the town centre in Map No. 5.	0	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	√	x	0	Potential negative impact in relation to development on flood plain.	
TC20: Town Centre Urban Block 1: (Opportunity Site 12 Main Street/Church Lane Backland Area) Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan, based on in-depth Preplanning discussions. Such proposals shall provide for a high quality mixed use town centre development with a range of retail unit sizes capable of accommodating higher order retail developments, centred upon a direct pedestrian linkage between Main Street, and the upper part of Church Lane (or alternatively Ard O'Donnell road) fronted and passively supervised by an active streetscape. In addition any development proposals should provide for: • A high quality element of public realm and streetscape within the development that is accessible and incorporates a mix of complementary uses. • A high architectural quality and a fine grain appearance (in terms of design, finishes and materials) throughout. • Development of a scale and architectural form that will not detract from the character and quality of the Cathedral Quarter or the Architectural Conservation Area.	0	0	√	√	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	0	0	?	0	Limited relationship between environmental protection objectives and policy TC 20. Potential negative affect in relation developing on flood plain.	

Policy	Assessment of policies against environmental protection objectives																						Comment				
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<ul style="list-style-type: none"> The protection of uninterrupted views of the Cathedral from all vantage points in the plan area. The protection, in so far as possible, of the residential amenities of the adjoining established residential areas. Detailed assessment of and proposals for vehicular access, traffic management, parking and loading. A car-parking shortfall will be permitted for the non-residential elements of the development where it can be demonstrated that adequate alternative car parking provision exists within the town centre and can be easily accessed from the site. 																											
<p>TC21: Town Centre Urban Block 2: (Opportunity Site 13 Cultural/Recreational/Public Administration Quarter) Proposals for the Development/Redevelopment of the site shall contribute to the creation of a Civic/Cultural/Recreational Quarter and shall be for civic/public administration, arts, or tourism uses. The Planning Authority may also consider commercial uses such as proposals for the evening economy where they are compatible with the overall vision for the quarter. In addition any development proposals shall provide for:</p> <ul style="list-style-type: none"> Innovative and high quality architectural design and a quality public realm in terms of building design and ancillary public spaces. Adequate accessibility and permeability in terms of walking and cycling, to the site and to the adjoining civic/public amenities. 	O	O	√	√	O	O	O	√	O	O	O	O	O	O	O	O	O	√	O	O	√	?	O	O	Potential negative affect in relation developing on flood plain.		
<p>TC22: Town Centre Urban Block 3: (Opportunity Site 14) Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan, based on in-depth preplanning discussions, and designed to provide a pedestrianised mixed use, civic quarter with a fine grain architectural appearance and high quality public realm. In particular any development proposals should provide for:</p> <ul style="list-style-type: none"> A high quality pedestrian street with appropriate hard and soft landscaping treatments, lighting and street furniture along the axis shown in the Urban Design Framework. High quality pedestrian linkages, with appropriate landscaping, lighting and street furniture between the site and retail developments to the southeast and southwest along the indicative lines shown on the Urban Design Framework. High Quality Active Street Frontages in accordance with Policy TC17 along the frontages designated as 'Active Frontages' in the urban design framework. A civic square or similar publically accessible open space with appropriate hard and soft landscaping elements and incorporating a artistic landmark feature. Public Toilets located adjacent to the civic square identified above. 	O	O	√	O	√	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	?	O	O	Limited relationship between environmental protection objectives and policy TC 22. Potential negative affect in relation developing on flood plain.		
<p>TC23: Town Centre Urban Block 4: (Opportunity Site 15) Proposals for the development/redevelopment of the site shall be the subject of a detailed Masterplan based on in-depth preplanning discussions, and designed to provide a mixed use, urban environment with a fine grain architectural appearance and high quality public realm. In particular any development proposals should provide for:</p> <ul style="list-style-type: none"> A mixed-use urban environment with provision for a mix of retail units capable of providing both larger former higher order retail development and smaller retail units. Building Setbacks in line with the setbacks identified on the Urban Design Framework for 'Railway Place' and the Linear Park. A distinctive landmark building on the corner site at the north western and north eastern extremities of the site in line Policy TC14. Continuous Active Frontages along the lines identified in the Urban Design Framework and in accordance with Policy TC 17. The subdivision of the block between the Linear Park and the Paddy Harte Loop Road to provide key pedestrian linkages in accordance with the Urban Design Framework. Specific hard and soft landscaping proposals on both the Linear Park and Inner public space identified in the Urban Design Framework. Specific proposals for the 'Railway Place' including: <ul style="list-style-type: none"> → Hard and soft landscaping features such as street furniture, lighting, green areas, bicycle-parking provision etc. → The identification of vehicular and pedestrian spaces (including sufficient definition between same), and pedestrian crossing points. 	O	O	√	√	√	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	?	O	O	Potential negative affect in relation developing on flood plain.		
<p>TC24: Town Centre Urban Block 5: (Opportunity Site 16) Proposals for the development/redevelopment of this site shall be subject to a detailed masterplan based on in-depth preplanning discussions and designed to provide mixed-use urban environment with a superior architectural quality and a high quality public realm. In particular development proposal(s) should provide for:</p> <ul style="list-style-type: none"> A building layout which: <ul style="list-style-type: none"> → Screens and softens the visual impact of the retail warehousing directly to the north (when viewed from the southern slopes of the Swilly), whilst maintaining the service access to the rear of same. → Fronts, positively addresses and sensitively integrates the riverside park along the River Swilly in any design proposals. A significant degree of residential development fronting the banks of the river Swilly. The Key linkages (both to and within the site) identified in the Urban Design Framework. High quality, public open space(s), passively supervised by the surrounding development with a minimum of car parking along its edges. The avoidance of large areas of surface car parking. The Retention of the mature trees situated at the southern extremity of the site on the northern bank of the Swilly and the incorporation of same into any overall landscaping proposals. 	O	O	√	√	√	O	O	√	O	O	O	O	O	O	O	O	O	O	O	O	O	?	O	O	Potential negative affect in relation developing on flood plain.		

Retailing

Policy	Assessment of policies against environmental protection objectives																						Comment			
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RT1: Retail Proposals and the Retail Strategy: Proposals for retail developments shall be considered in accordance with the amended objectives, frameworks and associated policies of the Retail Strategy contained in Volume 2 of this plan.	0	0	√	0	0	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	
RT2 Policy RT2: Location of Retail Development: Proposals for retail development shall be subject to the sequential test whereby: <ul style="list-style-type: none"> The area defined as the Town Centre (See Map 5: Town Centre Strategy) is the preferred location for Retail Development. Retail Development outside the Town Centre will only be permitted where the applicant has demonstrated to the satisfaction of the Planning Authority that no reasonable development opportunity exists within the Town Centre If no development opportunities are available within the Town Centre, then the next preference shall be a location on the Edge of the Town Centre Retail Development will then only be permitted outside of the Town Centre and Edge of Town Centre areas where the applicant has demonstrated to the satisfaction of the Planning Authority that no reasonable development opportunity exists within same. In addition to the above where a case is made for retail development outside of the Town Centre developers will be required to demonstrate that: <ul style="list-style-type: none"> → There is a demand for additional retail provision. → The development will not negatively impact on the existing standard of retailing or the overall vitality and viability of the defined Town Centre. The Council will seek a formal Retail Impact Assessment in circumstances where it is considered that the development might have a potential adverse impact. → The development can be accommodated at the specific location without contributing to ad hoc or haphazard development form or significantly hindering the capacity of the town to develop a compact urban form. → The development will be serviced by existing or proposed public transport links and will be easily accessible (in terms of distance and quality of linkages) from the town centre by both pedestrians and cyclists. → The development will be adequately serviced by existing infrastructure networks including roads, water, telecommunications, sewerage etc. 	0	0	√	√	0	?	0	√	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	
RT3: General Criteria for Retail Developments: Proposals for retail development will only be permitted where they: <ul style="list-style-type: none"> Comply with the sequential approach outlined in the Retail Planning Guidelines and the locational Policies for Retail Development contained within this plan. Provide safe and easy access to/from the development by pedestrians, cyclists and disabled persons. In particular large-scale retail developments shall demonstrate that they can be serviced by existing or proposed public transport links, local, regional and national. Comply with the car and bicycle-parking standards contained within Volume 2 of this Development Plan. Are of a high design standard and satisfactorily integrate with the surrounding built environment and comply with the built environment policies contained within this plan. Do not negatively impact upon the flow of vehicular traffic in either the immediate vicinity of the development or in the wider area. Provide adequate arrangements for the collection, attenuation, and discharge of surface water and otherwise comply with the Flood Prevention Policies contained within this plan. 	0	0	√	√	√	0	0	√	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts focused on population and human health.
RT4: Neighbourhood Retail Outlets Proposals for neighbourhood retail outlets, of up to 300m ² in size (this size restriction includes public retail floorspace space, and excludes storage areas and ancillary facilities) or extensions of less than 50% to an existing shop, which are intended to primarily serve a neighbourhood need..	0	0	√	0	√	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy RT4
RT5: Ancillary Retailing Development proposals for ancillary retail development, (i.e. retail developments ancillary to Industrial, Light manufacturing, and Service type activities) outside of the defined Town Centre will only be permitted where such retailing operations are ancillary to the business as a whole. The size of the retail space shall not exceed more than 10% of the total indoor space of the business in question.	0	0	√	0	√	?	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	Limited relationship between environmental protection objectives and policy RT5

Transport & Movement

Policy	Assessment of policies against environmental protection objectives																						Comment			
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Objective: To analyse land use and transport in a coordinated manner.	0	0	0	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	√	0	0	0	0	
Objective: To provide for a coordinated and planned linked transport network.	0	0	0	√	√	√	0	0	0	0	0	0	0	0	0	√	√	√	√	√	√	0	0	0	0	
Objective; To support and promote improved regional access.	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	
Objective: To improve traffic congestion throughout the town particularly in the town centre.	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	0	0	0	0	0	
Objective: To promote, support and encourage modal shift to walking and cycling	0	0	√	√	√	√	0	0	0	0	0	0	0	0	0	√	√	0	√	0	√	0	0	0	0	
T1: Letterkenny Integrated Land Use & Transportation Strategy	0	0	√	√	√	0	0	0	0	0	0	0	0	0	0	0	0	0	√	0	0	0	0	0	0	Significant beneficial impacts

<p>It is the policy of the Councils to prepare an Integrated Land Use & Transportation Strategy, comprising a strategic overview of transportation issues in the town and addressing a range of issues including urban cycling, pedestrian movement, reduced mobility concerns. The Strategy will focus strongly on:</p> <ul style="list-style-type: none"> • Integration within and between different modes of transport • Integration with the environment • Integration with land use planning • Integration with policies for education, health and wealth creation. <p>In order to influence the continued development of the town and to ensure a more accessible and attractive town in which to live and work, it will be the policy of the Councils in the interim, to:</p> <ol style="list-style-type: none"> Ensure that all new development complies with the Traffic Management Guidelines 2003. Facilitate Urban Transportation Control - the identification of key Urban Junctions, a coordinated signal system to manage movement into and around the town, through which pedestrians and cyclist are given equal weighting with traffic. Facilitate Town Centre Parking and Traffic Management - Land assembly, charging policy and enforcement. Facilitate Public Transport - Establishment of integrated infrastructure and support measures for the ongoing operation of the Letterkenny Town Bus service and the development of sustainable public transport, for example through Quality Bus Corridors or future rail links. Facilitate People Friendly Environments - measures, including Urban Junctions, to allow for the easy and safe movement of pedestrians and those with limited mobility or other needs in order to allow for comfortable, quality public and residential realms. Facilitate cycling and walking - A linked network of safe routes throughout the urban area, including safe routes to schools in partnership with other stakeholders. Facilitate new road construction - in accordance with Policy T7 and the prioritisation of infrastructural improvements required to enhance Letterkenny as a growth centre. Facilitate increased permeability - ensuring new development increases the incidences of linkages and flow of both public and private traffic, including pedestrian and cycle, throughout the town development envelope. Facilitate the development of a Transport Interchange Hub - Developing an integrated transport interchange hub thereby allowing for a more efficient, sustainable and dynamic transport model linking to and around the town. Facilitate new ways to travel - Encouraging and facilitating the use of green travel plans by both public and private interests, providing training and advice on implementation and safety. To facilitate transportation and landuse integration - a major focus on the efficient linking of landuse to transport allowing for easy and sustainable movement of people and vehicles, creating opportunities for the servicing of development by efficient public transport modes and creating opportunities for green travel planning. 		<p>focused on population and human health</p>
<p>T2: Strategic Road Links to the Town It is the policy of the Council's to safeguard national investment, by preventing the premature obsolescence of strategic road links to the town, by not permitting direct frontage access to the N13 and N14 within the Plan Area.</p>	<p>0 0 ✓ 0</p>	<p>Limited relationship between environmental protection objectives and policy T2</p>
<p>T3: Multi Modal Strategic Link - N14 Dry Arch roundabout to the Port Road roundabout It is the policy of the Councils to reserve a 'Multi Modal Strategic Link Corridor' (as identified on the Map No. 4, 'Transport Map') between the N14 Dry Arch roundabout and the Port Road roundabout to facilitate future further expansion, the provision of QBCs (Quality Bus Corridors) and other possible future transport innovations so as to ensure that the town shall be quickly, safely and efficiently serviced and to reduce journey time into the town.</p>	<p>0 0 ✓ 0</p>	<p>Limited relationship between environmental protection objectives and policy T3</p>
<p>T4: Rail Corridor It is the policy of the Council to ensure that the old railway line, running parallel to the N14 Dry Arch roundabout to Port Road roundabout along with all other intact railway lines within the plan area, shall remain free from development for possible future re-statement within the national rail network.</p>	<p>0 0 0 ✓ 0</p>	<p>Limited relationship between environmental protection objectives and policy T4</p>
<p>T5: Transport Interchange Hub It is the policy of the Council to facilitate the development of a new Transport Interchange Hub in order to ensure a multi modal transport system for the town. This shall indicatively be located at lands close to the Port Road roundabout as indicated on the Map No.4: 'Transport Map'.</p>	<p>0 0 ✓ ✓ ✓ 0</p>	<p>Significant beneficial impacts focused on population and human health</p>
<p>T6: Strategic Roads; Traffic and Transport Assessment It is the policy of the Councils on Strategic roads to: a. Implement the NRA's Traffic and Transport Assessment Procedures for all Planning Applications. Details of the TTA procedure are set out in Appendix A Development Guidelines and Technical Standards (County Donegal Development Plan 2006 -2012, Section 2 Transportation and Communications). b. Require that a Road Safety Audit must be carried out as part of any development that involves a change to the existing road layout, in accordance with the NRA DMRB¹ HD 19/01 Road Safety Audits HA 42/01 Road Safety Audit Guidelines.</p>	<p>0 0 0 ✓ 0</p>	<p>Limited relationship between environmental protection objectives and policy T6</p>
<p>T7: New Strategic Relief Road Development & Urban Road Improvement Around The Town The Councils seek to improve access into, through and around Letterkenny through the further upgrade and development of Urban Roads and the identification and provision of new Strategic Relief Road Corridors. (See Map No. 4 'Transport Map'). The roads and corridors identified are an indicative width of 20 metres.</p>	<p>0 0 ✓ ✓ ✓ 0</p>	<p>Significant beneficial impacts focused on population and human health</p>
<p>T8: Traffic & Transport Assessments Proposals for development likely to generate significant traffic problems shall: • Consult with the Councils Transport Authorities, (Roads & Transportation Service, Town Engineer & NRDO), in order that Traffic Impact Assessments are scoped and agreed prior to undertaking. • Submit a Transport Impact Assessment.</p>	<p>0 0 0 ✓ 0</p>	<p>Limited relationship between environmental protection objectives and policy T8</p>
<p>T9: Traffic Management Programme It is the policy of the Council to implement a programme in relation to Urban Junctions. This programme will involve a linked signal system to manage movement into and around the town, through which pedestrians and cyclists are given equal weighting with traffic.</p>	<p>0 0 0 ✓ 0</p>	<p>Limited relationship between environmental protection objectives and policy T9</p>
<p>T10: Parking standards Proposals for development must comply with the Council's Car Parking Standards as defined in Volume 2, Development Guidelines and Technical Standards. New development must provide the minimum cycle and car parking standards, as set out in Development Guidelines and Technical Standards on the site or by way of a development levy to a public car or cycle parking scheme.</p>	<p>0 0 0 ✓ 0</p>	<p>Limited relationship between environmental protection objectives and policy T10</p>
<p>T11: Cycling and Walking The Council will promote the development of cycling and walking as a viable transport option. To do so, all development proposals shall</p>	<p>0 0 0 ✓ 0</p>	<p>Limited relationship between environmental protection</p>

9.0 Mitigation

A number of mitigating measures have been developed within the policy framework in order to redress potentially negative impacts on the environment. The significant issues that have resulted in the need for mitigation measures are set out in the table below. It is noted that this plan represents a refinement of previous plans and that mitigation is primarily channelled through the need to seek quality within the Gateway. It is also noted that further mitigation measures are likely to be developed within the life of this plan arising from the work outputs of the 'Flooding Study' and the 'Integrated Land Use and Transportation Study.'

Significant issues	Mitigation
The substantial amount of Greenfield land that is zoned for 'primarily residential' development and the associated potential impacts on the environment, dispersal of residential areas, quality of life, landscape, air quality.	To mitigate against the potential negative effects, the policy places emphasis on the need to develop quality residential areas through design processes. Specifically, the following policies have been developed: <ul style="list-style-type: none"> (i) A neighbourhood approach to the development of new residential areas is set out in the plan that assesses each emerging new neighbourhood and gives information on the likely level of neighbourhood facilities that would be required in the event that the neighbourhood develops to full capacity. This neighbourhood approach and policies N1, N2 and N3 provide the environment to consider new proposals on residential land within the context of developing sustainable integrated residential areas and therein redressing the possible negative effects on quality of life indicators. (ii) Policies H6-H20 have been developed in order to ensure that new residential areas on Greenfield lands is managed in order to achieve high ranking in terms of sustainability indicators. Specifically the

Significant issues	Mitigation
	<p>policy deals with layout and design of new development in their wider context of neighbourhoods and in relation to the qualitative standards and specifications for new units. This includes the roll out of design briefs and the preparation of design statements and concept proposals.</p> <p>(iii) The Childcare Strategy, contained in Volume 2 of the plan mitigates against the effects of creating large new populations in the environs of the plan area by requiring the integration of childcare facilities within new housing areas.</p>
A substantial amount of land is zoned 'Strategic Residential Reserve' within the plan area and is noted as inherited zoned lands from previous plans. Effects relate to potential for dispersed residential development.	Policy H4 has been developed so as to mitigate against the release of land for residential purposes in a sporadic and dispersed, unsustainable manner. Policy H4 firmly establishes the purposes of SRR lands as a long term strategic housing landbank and provides a framework for the release of these lands by means only of an evidenced led approach, managed through the Variation processes of the Planning Acts.
Effects on the landscape setting of the town particularly in the environs area.	<p>Having regard to the significant land mass in the environs of the town together with the landscape quality of much of the lands, the plan provides mitigation in 3 ways:</p> <ul style="list-style-type: none"> i. Identification of lands as 'local environment' and therein not providing for high density development of urban form. ii. Quality standards in relation to layout and design of new residential areas. iii. Policy NE5 in relation to biodiversity and policy NE3 in relation to the protection trees.

Significant issues	Mitigation
Effects on built heritage of the town including loss of important built heritage.	The plan recognises the wealth of important built heritage in the town in its cumulative form that provides an attractive set of streetscapes and townscapes. To mitigate against the pressure for removal or alteration of these important buildings in an inappropriate manner, the plan sets out a series of policies that are aimed at guiding new development in a manner that is complimentary to the important built heritage as exists and that recognises the contribution of built heritage in developing an attractive Gateway city for people to live in, to invest in and to visit. Specifically policies N4- N16 refer.
Loss of biodiversity, habitats, species at European protected sites.	To mitigate against any negative effects of new development on European protected sites, Policy NE1 has been developed so as to regulate the encroachment of development on these environmentally important sites and to endorse the EU designation in the first instance.
Loss of biodiversity, habitat, species in general terms within the plan area.	To mitigate against loss of biodiversity and environmental impacts on the more sensitive areas of Letterkenny, policies NE4 and NE5 have been developed to ensure that development proposals do not detract from important biodiversity features.
Impacts arising from flood risk.	To mitigate against the effects of flooding, a managed approach to developments within the flood risk area has been developed in recognition that the flood plain is generally identified as an area of development potential. Policies NE8, 9 and 10 refer.

10.0 Monitoring

Article 14J (1) of the Planning and Development (Strategic Environmental Assessment) Regulations 2004 requires monitoring of the significant environmental effects of the implementation of plans “in order, inter alia, to identify at an early stage unforeseen adverse effects and to be able to undertake appropriate remedial action.”

The purpose of monitoring is to cross check significant environmental effects, which arise during the implementation stage against those predicted during the plan preparation stage. Monitoring of the implementation of the Letterkenny and Environs Development Plan shall be focused on the following indicators, which have been identified and established throughout the course of this SEA in accordance with the SEA Guidelines.

The process of monitoring shall begin after the plan is adopted and shall continue over the period of the plan. The statutory Managers Progress Report is to be prepared 2 years after the adoption of the plan (Section 15(2) of the Planning and Development Act 2000); it is anticipated that the environmental indicators set out below will be used to monitor the environmental impacts of the plan and be presented in the context of this 2 year review. The monitoring results shall subsequently be used in the compilation of a baseline study in the normal review of the plan.

The monitoring element of the plan is considered to be a critical phase in the life of the plan. In this regard, the Letterkenny & Environs Development Plan is very much an implementation plan which will be used both in the determination of planning applications but furthermore in developing programmes for the integrated delivery of quality urban environments.

Nature of impact/subject area	Monitoring measure
Loss of biodiversity flora and fauna/deterioration in habitat quality	Continued monitoring of Biodiversity within the Plan area; based upon the baseline Biodiversity work as detailed in the 'Biodiversity Study'. Particular emphasis to be placed on the monitoring of areas identified as areas of special biodiversity importance.
Quality of life/human health	<ul style="list-style-type: none"> • Annual record of new neighbourhood facilities constructed. • Data indicators to be developed through the forthcoming 'Integrated land use and Transportation Study' (e.g. journey to work time, trip generations, access to public transport). • Collation of data on access (walking and cycling) to neighbourhood facilities within the category of neighbourhood shop, childcare, education, parkland, public transport, health facilities.
Landscape change	<ul style="list-style-type: none"> • Annual record of number of new commercial/employment units permitted. • Annual collation of data on new housing densities permitted within 'primarily residential' zones. • Annual update of existing land uses within the wider plan area and associated land use change. • Annual update of existing land uses within the town centre and associated land use change. • Annual housing monitor (number of units permitted, number of commencements, number of completions). • Annual assessment of per year uptake of zoned lands.

Nature of impact/subject area	Monitoring measure
Air quality	Continued collation of EPA air quality monitoring data.
Water quality	<ul style="list-style-type: none"> • Continued collation of EPA water quality data. • Collation of results of water quality monitoring carried out by Donegal County Council.
Flooding	<ul style="list-style-type: none"> • Continued collation of recorded floods within the plan area. • Data indicators to be developed via the forthcoming 'flood study' and monitored at regular intervals.
Material assets	<ul style="list-style-type: none"> • Record known loss and or damage of protected sites or structures within the Plan area. • Collate number of new additions to RPS

SECTION 11.0 Screening in respect of Appropriate Assessment of the draft Letterkenny & Environs Development Plan 2009-2015

In line with the requirements of Article 6 (3) of the EU Habitats Directive (Directive 92/43/EEC)

11.1: Introduction

11.1.1 Background

This document fulfils the requirements of the EU Habitats Directive (Directive 92/43/EEC) in respect of the **screening for Appropriate Assessment** (AA) of the draft Letterkenny & Environs Development Plan 2009- 2015). The purpose of the screening exercise is to identify the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination and consider whether these impacts are likely to be significant.

Natura 2000 sites are protected habitats for flora and fauna of European importance and comprise Special Areas of Conservation designated under the Habitats Directive and Special Protection Areas designated under the Birds Directive.

The Habitats Directive requires that any draft land use plan must be screened for any potential impact on areas designated as Natura 2000 sites. Specifically, article 6(3) states:

'Any plan or project not directly connected with or necessary to the management of the 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 sites conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public.'

11.1.2 Methodology

The screening for AA in respect of the draft Letterkenny Plan 2009- 2015 has been prepared in line with the 'Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC,' European Commission, 2001.

The Methodological Guidance outlines four steps in the AA process as follows:

- **Stage 1: Screening** (The purpose of this document).
The process, which identifies the likely impacts upon a Natura 2000 site of a project or plan, either alone or in combination with other projects or plans, and considers whether these impacts are likely to be significant.
- **Stage 2: Appropriate Assessment**
The consideration of the impact on the integrity of the Natura 2000 site of the project or plan, either alone or in combination with other projects or plans, with respect to the sites structure and function and its conservation objectives. Additionally, where there are adverse impacts, an assessment of the potential mitigation of those impacts.
- **Stage 3: Assessment of alternative solutions**
The process which examines alternative ways of achieving the objectives of the project or plan that avoid adverse impacts on the integrity of the Natura 2000 site.
- **Stage 4: Assessment where no alternative solutions exist and where adverse impacts remain.**
An assessment of compensatory measures where, in the light of an assessment of imperative reasons of overriding public interest (IROPI), it is deemed that the project or plan should proceed.

11.1.3 Identification of Natura 2000 sites that may be affected.

There are two Natura 2000 sites that are in part located within the plan area of the draft Letterkenny & Environs Development Plan 2009- 2015 and part located outside the plan area. These are shown on the map below. The sites are as follows:

- Lough Swilly Special Area of Conservation (Site code 002287).
- Lough Swilly Special Protection Area (Site code 004075).



11.2. Screening

11.2.1 Introduction

This section sets out the actual screening exercise for the purposes of AA. The Methodological Guidance outlines four sub- steps within the screening exercise as follows:

1. Determining whether the project or plan is directly connected with or necessary to the management of the site;
2. Describing the project or plan and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the Natura 2000 site;
3. Identifying the potential effects on the Natura 2000 site;
4. Assessing the significance of any effects on the Natura 2000 site.

Each sub- step is now considered in the following pages.

11.2.2 Is the project or plan directly connected with or necessary to the management of the Natura 2000 sites? (Step 1)

The Methodological Guidance outlines that for a project or plan to be 'directly connected with or necessary to the management of the site', the 'management' component must refer to management measures that are for conservation purposes, and the 'directly' element refers to measures that are solely conceived for the conservation management of a site and not direct or indirect consequences of other activities. The draft Letterkenny & Environs Development Plan consists of objectives in relation to the natural environment including conservation but it is not directly or indirectly prepared for the purpose of the conservation management of the identified Natura 2000 sites.

11.2.3 Describe the project or plan and describe and characterise other projects or plans that in combination have the potential for having significant effects on the Natura 2000 sites (Step 2) and identify the potential effects on the Natura 2000 sites (step 3).

This section examines the various elements/parameters of the plan so as to assist in the understanding of potential impacts. Where an element/ parameter results in a potential impact on the Natura 2000 sites, these are noted.

(i) Description of the content of the plan:

The draft Letterkenny & Environs Development Plan is a statement of policy that sets a framework for the future growth of Letterkenny over the period 2009- 2015. In particular the role of the development plan, is to set out a vision and growth strategy for the town, to identify areas and zones that are suitable for development, to set out policies that will guide the manner in which development is carried out and to clarify proposals including planned projects in the area. The plan area comprises some 2482 hectares of land mass and the population in 2006, within the plan area, was estimated at 19,363. The town is identified as a linked Gateway with Derry city and is therefore to be an engine of growth for the region in terms of critical mass and all associated attributes such as economic development, retail activity, entertainment and education as examples.

The growth strategy adopted in the plan is one of achieving the 'Sustainable Development of the Gateway.' The key characteristics of this growth strategy are:

- Support the Gateway status in a sustainable manner.
- Consolidation of urban footprint.
- Integration of neighbourhoods.
- Permeability via corridors.
- Balanced development of environmental resources.
- Quality of urban form.
- Vitality of services.

The overarching aim of the plan is:

To promote the sustainable growth and development of Letterkenny and its environs as a linked Gateway with Derry so as to focus on the delivery of quality urban structure through the strengthening of neighbourhoods, the promotion of improved quality of life and the promotion of social inclusion and equal access to employment, housing, transport, education and social and cultural activities.

The strategic objectives of the plan are as follows:

1. To support vibrant communities in the neighbourhood context and prioritise social inclusion through equality of access to a range of activities including health, recreation, education, childcare, arts, culture, shopping, sports.

2. To consolidate and strengthen urban form and improve the quality of residential neighbourhoods through improved connectivity and accessibility to community, social, cultural and physical infrastructure.
3. To protect and support the existing economic base of Letterkenny and promote new balanced and sustainable economic growth at a local and regional level through the provision of a quality business environment, high level infrastructural access and attractive urban form.
4. To create a consolidated, vibrant, multifunctional, accessible and attractive town centre.
5. To protect and enhance the built and natural environment ensuring the sustainable use of identified important resources and to minimise the adverse impacts of development on the environment.
6. To promote the integration of land use and transportation so as to encourage modal shift and the development of sustainable transportation policies.
7. To identify and prioritise infrastructural improvements, in a balanced and sustainable manner, that are required in order to support the linked Gateway status of Letterkenny - Derry, in particular the growing population and economic activity.

Specifically and directly in relation to lands abutting the Natura 2000 sites, the draft plan provides the following policy context that may result in potential impacts on the Natura 2000 sites:

- The protection of Natura 2000 sites by zoning of the areas (only those lands that fall within the plan boundary) as 'SPA, NHA, SAC and associated adjoining lands' the policy of which is as follows:

'Lands identified as SAC, SPA, NHA and associated adjoining lands on the land use zoning map have been designated as such under European and National Legislation or are intrinsically linked to such a designated area. In these areas there shall be a general presumption against development. Development on such lands shall only be considered where all the following criteria can be met:

 - a) There is significant and identifiable public interest in doing so; and*
 - b) There is no direct or indirect adverse impact on the environmental attributes of the site as set out in the individual site synopsis relating to each designation; and*
 - c) The proposal shall harness the ecological, environmental, aesthetic and biodiversity value of the site in a balanced manner that will not be harmful to the natural environment; and*
 - d) Adequate mitigation measures are put in place.'*

Potential impact: Minimal to zero interference at Natura 2000 sites.
- The identification of lands as 'open space' along the river corridor and adjoining the Natura 2000 sites.

Potential impact: Minimal to zero interference at Natura 2000 sites.
- The provision of policy NE4: River Swilly & Environs which states as follows: *'The Council seek to improve the quality of the River Swilly environment as a wildlife corridor and to provide for improved pedestrian/ cycle access to the river.'*

Potential impact: Minimal to zero interference at the Natura 2000 sites in terms of built form. Potential loss of habitat as a result of construction of pathways and human erosion.
- The provision of policy NE5: Biodiversity which states as follows: *'The Planning Authority shall have regard to the established level of biodiversity identified in Map No. 1 contained in Volume 3, Environmental Report, 'Biodiversity', by requiring that development proposals do not detract from the important biodiversity features that have been identified in the study.'*

Potential impact: Minimal to zero interference at Natura 2000 sites.

- The provision of policy NE6: Water Quality Management which states as follows: *'Proposals for development are required to have regard to the quality and quantity of water resources. Development will only be permitted where it can clearly be demonstrated that there will be no direct or indirect damaging effects on water resources.'*

Potential impact: Protection of the integrity of the Natura 2000 sites.

(ii) Plan sector:

The draft Letterkenny & Environs Development Plan is a spatial land use plan prepared under the provisions of the Planning & Development Acts 2000- 2007.

Potential impacts: This plan does not provide for the implementation of activities or conservation measures within the Natura 2000 sites.

(iii) Physical changes that will flow from the plan:

The plan aims to facilitate new growth in the town. New development is likely to involve excavation and / or ground preparation works to varying degrees dependant on the topography of each development site.

Potential impacts: The plan guides new development to locations outside of the Natura 2000 sites therefore there is not likely to be a potential impact on the Natura 2000 sites.

(iv) Resource requirements:

- The new development envisaged by the plan will require water abstraction for the purposes of adequate water supply. Current water supply is provided through abstraction from Lough Salt and Lough Keel of 9MLD. Additional supply will be provided through a number of schemes, the most significant of which is the Letterkenny/Lough Mourne scheme that will secure medium/long term needs.

Potential impacts: There is not likely to be a potential impact on the Natura 2000 sites.

- The new development envisaged by the plan will require the uptake of land that is currently undeveloped/ Greenfield. The types of landscapes that will be required as a resource are wide ranging from semi- urban area to undeveloped rural lands. Undeveloped lands consist of agricultural lands from pasture fields with linear hedgerow boundaries and tree lines to small areas of tillage fields. The plan does however, identify lands that are not deemed to be suitable for development proposals and as such the plan places zoning protections/ limitations/requirements on these important sites.

Potential impacts: Uptake of land for development purposes is to be guided to locations outside of the Natura 2000 sites therefore there is not likely to be a potential impact.

(v) Emissions and waste:

- The new development envisaged by the development plan has the potential to impact on air quality in the area as increased urbanisation is likely to result in increased vehicular movement (both private car and public transport).

Potential impact: There are likely to be impacts on air quality in the plan area and at the Natura 2000 sites but in conjunction with the plan strategy and policies to increase sustainable modes of transport (walking cycling/ public transport), the effects are anticipated to be neutral.

- The new development envisaged by the development plan will result in increased loadings to the Wastewater Treatment Works. The existing Letterkenny Sewerage Treatment Works is of insufficient capacity to cater for the new growth anticipated. As a result, the plan supports the upgrade of the

WWTW's to provide for appropriate treatment for Letterkenny to the size of 40,000PE. This scheme is due for commencement of contract during 2009.

Potential impact: The impact associated with the existing WWTW's capacity is likely to negatively affect the water quality status of the Natura 2000 site in relation to the risk categories identified under the Water Framework Directive. It is noted that a scheme to upgrade the WWTW's to redress this deficiency is well advanced and therefore it is anticipated that there will be improvement in relation to the risk categories under the WFD.

(vi) Transportation requirements:

- A number of transportation proposals are contained within the plan comprising new road building and including a number of bridge crossings. The potential impacts arising from these projects involve the uptake of currently undeveloped land, excavation works, ground preparation works such as piling where appropriate and removal/ segregation of natural habitats.

Potential impact: The proposals are generally located outside the Natura 2000 sites and therefore it is not anticipated that there will be identifiable impacts.

- The plan envisages growth in alternative and sustainable transportation modes in the form of walking, cycling and bus services. The potential impacts arising involve the construction of necessary infrastructure such as pathways, cycleways, quality bus corridors that will result in uptake of lands, albeit integrated into already existing urban areas.

Potential impact: The proposals are generally located outside the Natura 2000 sites and therefore it is not anticipated that there will be identifiable impacts.

(vii) Plan implementation period/duration of construction:

The life of the plan is 6 years during the period 2009-2015. The plan will provide the land use framework through which development proposals will be guided and advanced therefore construction will be ongoing.

Potential impacts: No potential impacts.

(viii) Distance from Natura 2000 site or key features of the site:

- The two sites identified (Lough Swilly SAC 002287 and Lough Swilly SPA 004075) partly abut the plan area on the eastern side of Letterkenny and are in part located within the plan area forming the River Swilly, designated up to Magheranan (SPA) and to the Polestar Roundabout (SAC).

Potential impacts: A small area of the Natura 2000 sites are located within the plan area therefore the potential impacts in terms of all the conservation objectives of the Natura 2000 sites, is reduced. It is noted that at low tide, extensive sand and mud flats are exposed especially at the mouths of the Swilly and Lennan Rivers.

- The following site synopsis are sourced from www.npws.ie and set out the detail of each site. In addition, target notes in respect of the areas located within the draft plan boundary are sourced from the 'Biodiversity Assessment Study of Letterkenny & Environs' May 2008, prepared by Catherine Storey, GlásEnviros Teoranta on behalf of Letterkenny Town Council and Donegal County Council.

Lough Swilly Special Area of Conservation (Site code 002287):

This large site, situated in the northern part of Co. Donegal, comprises the inner part of Lough Swilly. It extends from below Letterkenny to just north of Bunrana. Lough Swilly is a long sea-lough, cutting through a variety of metamorphic rocks on the west side of Inishowen.

The site is estuarine in character, with shallow water and intertidal sand and mud flats being the dominant habitats. The main rivers flowing into the site are the Swilly,

Lennan and Crana. At low tide, extensive sand and mud flats are exposed, especially at the mouths of the Swilly and Lennan rivers. Bivalves and polychaete worms are well represented in the macro-invertebrate fauna, with species such as Cockles (*Cerastoderma edule*), Mussels (*Mytilus edulis*), Baltic Tellin (*Macoma balthica*), Ragworm (*Nereis diversicolor*) and Sand Mason (*Lanice conchilega*) being common. Cord-grass (*Spartina anglica*) is well established on parts of the intertidal flats. The shoreline above the flats varies from bedrock shore to shingle or cobbles, and here is found a scattering of salt tolerant plants such as Scurvygrass (*Cochlearia officinalis*), Sea Milkwort (*Glaux maritima*) and Red Fescue (*Festuca rubra*).

Salt marshes are well represented in the inner sheltered areas of the site, with good examples in the Ramelton area. The marshes are the Atlantic salt meadow type, and are characterised by such species as Thrift (*Armeria maritima*), Sea Milkwort (*Glaux maritima*), Sea Aster (*Aster tripolium*), Sea Arrowgrass (*Triglochin maritima*) and Red Fescue (*Festuca rubra*).

Lakes, which are lagoonal in character, occur at Inch and Blanket Nook. Inch Lough is a good example of a large, shallow lagoon with very low salinity in most of the lagoon. Less information is available for Blanket Nook but it is of a higher salinity and adds to the richness of the habitat within the site as a whole. The vegetation in Inch is diverse and typically lagoonal, with well developed charophyte communities, including a large population of *Chara canescens* (a Red Data Book species). It also supports Horned Pondweed (*Zannichellia palustris*) and a mixed Pondweed/Tassleweed Community (*Potamogeton pectinatus/Ruppia maritima*). The green alga *Chaetomorpha linum* occurs at Blanket Nook. The aquatic fauna at Inch is rich and diverse and includes a range of lagoonal specialists and species that are apparently rare. These include *Lekanesphaera hookeri*, *Palaemonetes varians*, *Conopeum seurati*, *Sigara stagnalis*, *S. concinna*, *Jaera nordmanni*, *Neomysis integer* and *Cordyllophora caspia*. Less information is available on the aquatic fauna at Blanket Nook, though several lagoonal specialists have been recorded, including *Jaera ischiosetosa*, which appears to be a rare species in Ireland. Inch Lough is regarded as of significant conservation value for ectonal Coleoptera, with several species indicative of well-developed shoreline habitats including two that are apparently rare: *Bembidion bipunctatum*, a halotolerant shore species, and *Bembidion aeneum*, a stenotopic halobiont species. Although artificial in origin, the lagoon habitat in this site is one of the largest and best examples of a shallow, low salinity lagoon habitat in the country.

Two woodlands occur adjacent to the north-western shore of Lough Swilly. These are Rathmullen and Carradoan Woods, the former being a Nature Reserve. They are dominated by Sessile Oak (*Quercus petraea*) and Birch (*Betula pubescens*), but many other species are present including exotics such as Beech (*Fagus sylvatica*). Alder (*Alnus glutinosa*) and Willows (*Salix* spp.) occur in the wetter parts. An area of wet heath, dominated by Ling (*Calluna vulgaris*), occurs on the hill above Carradoran Wood. These woodlands display a generally intact structure and support a range of breeding birds, including Woodcock.

A further area of woodland, scrub and heath occurs above the north-east shore at Crockacashel and at Porthaw. Oak/Hazel (*Corylus avellana*) scrub is frequent, and there is a well developed ground flora with species such as Wood-sorrel (*Oxalis acetosella*), Herb Robert (*Geranium robertianum*), Lady's fern (*Athyrium filix-femina*) and Broad Buckler Fern (*Dryopteris dilatata*). The heath vegetation includes Ling (*Calluna vulgaris*), Common Gorse (*Ulex europaeus*), Wood Sage (*Teucrium scorodonia*) and Tormentil (*Potentilla erecta*). In the wetter areas, Purple Moor-grass (*Molinia caerulea*) and Cross-leaved Heath (*Erica tetralix*) occur.

The site supports a population of Otter, a species listed on Annex II of the EU Habitats Directive. Lough Swilly is an important site for waterfowl in autumn and winter. The shallow waters provide suitable habitat for grebes and diving duck, while the intertidal flats are used by an excellent diversity of wildfowl and waders. At high tide, the duck and wader species roost on the salt marshes and shorelines, with some species moving to the adjacent pasture and arable fields. In the three winters 1994/95 to 1996/97, 16 species occurred in nationally important numbers as follows (figures are average maximum counts for the 3 winters): Great Crested Grebe (274), Shelduck (646), Wigeon (1,673), Teal (1,381), Mallard (1,155), Shoveler (58), Scaup (143), Goldeneye (169), Red-breasted Merganser (103), Coot (335), Oystercatcher (1,459), Knot (327), Dunlin (7,995), Curlew (1,716), Redshank (1,080) and Greenshank (30). Other species which occur in regionally or locally important numbers, and at times may exceed the threshold for national importance, include Brent Goose, Pochard, Tufted Duck, Lapwing, Ringed Plover, Grey Plover, Bar-tailed Godwit and Turnstone. The site is also an important area for the Great Northern Diver and the rare Slavonian Grebe.

The adjacent pasture and arable polders at Inch, Big Isle and Blanket Nook support internationally important populations of Whooper Swans, Greenland White-fronted Geese and Greylag Geese. Inch Lough is an important roosting area for these birds and at times they utilise other parts of Lough Swilly for roosting.

This site is of conservation importance as it contains good examples of at least four habitats listed on Annex I of the EU Habitats Directive (estuaries, lagoons, Atlantic salt meadows, old oak woods) and supports a population of Otter. In addition, it is of high ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance, plus 3 species occurring within the site and on adjacent polders in numbers of international importance.

Lough Swilly Special Protection Area (Site code 004075):

This site, situated in the northern part of Co. Donegal, comprises the inner part of Lough Swilly, a long inlet of the sea that cuts through a variety of metamorphic rocks on the west side of the Inishowen Peninsula. The Lough Swilly SPA extends from just below Letterkenny north to Rathmullan and, except in the area between Farsetmore and Blanket Nook on the southern side of Lough Swilly, the site is bounded by the High Water Mark; its seaward boundary is the Low Water Mark.

Between Farsetmore and Blanket Nook a series of improved pasture and arable fields of importance to geese and swans are included. The site includes sections of the estuaries of the River Swilly, the River Leannan and the Isle Burn and the predominant habitat is a series of extensive sand and mud flats which are exposed at low tide - both estuaries and sand/mud flats are listed on Annex I of the E.U. Habitats Directive. Other habitats represented on the site are salt marshes, lakes which are lagoonal in character (at Blanket Nook), rivers and streams, sand and shingle beaches, lowland wet, dry and improved grasslands, arable land, drainage ditches, reedbeds and scrub. The adjacent Inch Lough and Levels are included in a separate SPA.

Lough Swilly is an important site for waterfowl in autumn and winter. The shallowwaters provide suitable habitat for grebes and diving duck, while the intertidal flats are used by an excellent diversity of wildfowl and waders. At high tide, the duck and wader species roost on the salt marshes and shorelines, with some species moving to the adjacent pasture and arable fields. In the three winters 1994/95 to 1996/97, 16 species occurred in nationally important numbers as follows (figures are average maximum counts for the 3 winters): Great Crested Grebe (274), Shelduck (646), Wigeon (1,673), Teal (1,381), Mallard (1,155), Shoveler (58), Scaup

(143), Goldeneye (169), Red-breasted Merganser (103), Coot (335), Oystercatcher (1,459), Knot (327), Dunlin (7,995), Curlew (1,716), Redshank (1,080) and Greenshank (30). Other species which occur in regionally or locally important numbers, and at times may exceed the threshold for national importance, include Brent Goose, Pochard, Tufted Duck, Lapwing, Ringed Plover, Grey Plover, Bar-tailed Godwit (a species that is listed on Annex I of the E.U. Birds Directive) and Turnstone. The site is also an important area for the Great Northern Diver and the rare Slavonian Grebe, both Birds Directive Annex I species. Golden Plover, a species that is listed on Annex I of the E.U. Birds Directive, used the site regularly during winter (4 year mean of winter maximum 1994/95-1997/98 was 1,001 individuals).

Lough Swilly supports internationally important numbers of Greenland White-fronted Geese (5 year mean of winter maximum 1995/96-1999/00 for the Lough Swilly flock was 970 individuals), Whooper Swans (5 year mean of winter maximum 1995/96-1999/00 was 1,135 individuals, the largest population in the country) and Greylag Geese (5 year mean of winter maximum 1995/96-1999/00 was 2,020 individuals - this figure includes both migratory birds of the Icelandic population as well as an estimated 750-1,000 feral birds). The numbers of Greylag Geese using the site has continued to increase in recent years. The main areas of the site used by these species are at Big Isle, Farsetmore, Blanket Nook and Ballylawn. The Inch Levels are used by the same flocks of geese and swans - this area is included in a separate Special Protection Area. Both Greenland White-fronted Goose and Whooper Swan are listed on Annex I of the E.U. Birds Directive.

This site is major ornithological importance for wintering waterfowl, with 16 species occurring regularly in numbers of national importance and 3 species occurring within the site in numbers of international importance. The site is regularly used by in excess of 20,000 waterfowl and thus qualifies as of international importance. The site is used by several species that are listed on Annex I of the E.U. Birds Directive.

(ix) Cumulative impacts with other projects or plans:

The Letterkenny & Environs Development Plan will operate alongside (a) the County Donegal Development Plan 2006- 2012 (as varied) (b) a number of existing local area plans the most relevant in this case being Newtowncunningham Local Area Plan 2007- 2013 & Amendment no 1 2008 and (c) a series of other local area plans that are being prepared for the surrounding towns and villages, particular in the border region. The boundaries for this assessment include Letterkenny extending to include Manorcunningham, Newtowncunningham, Bridgend and Burnfoot as well as the intervening rural environment.

Cumulatively, the strategic policy framework of these plans provides for the establishment of critical mass within Letterkenny together with limited nodal growth at other key towns in the gateway region. In parallel, the policy framework places greater restrictions on the development of single one- off houses in the rural area in the gateway region (Urban Generated Rural Development). The cumulative potential impacts relate to the spin off from concentration of population to defined locations and a reduction in the dispersed settlement pattern evidenced heretofore. This has the potential to lead to (a) changes in trip generations by means of private car from sporadic and frequent to less sporadic, less frequent and more coordinated and linked to key trips for key purposes that have the potential to be accommodated through public transport services. Thus the impact may be evidenced through a reduction in carbon monoxide emissions. (c) Increased connections to Wastewater Treatment Works in lieu of septic tanks/ individual treatment systems resulting in reduced risk of contamination of groundwater sources and reduced risk of contamination of natural habitats. (d) Reduced land take due to more efficient use of

land and higher densities resulting in reduction of threat of loss of natural habitat, important environmental, heritage and cultural features and landscapes of visual importance.

The potential cumulative impacts described above are likely to provide a more coordinated spatial planning framework for the growth of the region that will begin to redress the dispersed settlement pattern of the area and support the growth of Letterkenny in the context of the Linked Gateway and the surrounding support nodes with knock on benefits in the protection of the integrity of the Natura 2000 sites.

- **Target notes in respect of River Swilly located within the draft plan boundary (sourced from the 'Biodiversity Assessment Study of Letterkenny & Environs' May 2008, prepared by Catherine Storey, GlásEnviros Teoranta on behalf of Letterkenny Town Council and Donegal County Council).**

Survey title: Biodiversity assessment	Site name: Ballyraine/ port Bonagee Letterkenny	Weather conditions: Cold and bright sunshine J		
Grid ref. Elevation: 10m	Geology; Lough Foyle Succession Schist and grit with think marble units	OS map re: Discovery series		
Surveyor (s) C. Storey		Survey date(s): 6 th Oct 2007		
County: Donegal	LA District Buncrana	Townland		
JNNC Habitat code: B.6 poor semi- improved grassland.	Heritage council code: GS4 Wet grassland (water logged	Bonagee		
<p>Target note: B.6. Grassland, Hedgerow J.2.3. (GS4 wet grassland WL1 linear hedge, WL2 treeline, Gs2 Dry meadow)</p> <p>Survey: The site is located within an area of reclaimed alluvial coastland, consisting of primary and secondary dyke systems. The dyke systems were created and designed during the LondonDerry and Lough Swilly (LD & LS) railway construction period of mid 19th century. The engineering land management of the alluvial coastal plain has allowed the extensive use as prime arable lands for growing barley and oat crop.</p> <p>Observation: The site at present is used as cattle pasture. Plant species diversity was found to be generally low, increasing along the hedgerow ditches.</p> <p>Birds: Small woodland passerine birds were found to be abundant. The tall mature trees provide nesting for rooks and crows. Bird species noted during the field survey was a flock of 6 <i>Oenanthe</i> Wheatears within open hill area, a flock of 30 <i>Sturnus vulgaris</i> (Stralings) flying between the stands of hazel and hawthorn scrub. 10 of hooded crow <i>Corvus corone cornix</i> were sighted flying above the lowland pasture fields to the north of the site. Numerous woodland birds were observed within the stands of woodland scrub; <i>Fringilla coelebs</i> (Chaffinch), <i>Phylloscopus trochilus</i> (Willow Warbler), <i>Motacilla alba ssp. Yarelli</i> (Wagtail), <i>Erithacus rubecula</i> (Robin), <i>Prunella modularis</i> (Dunnock), <i>Turdus merula</i> (Black bird) <i>Certhia familiaris</i> Tree creeper, <i>Phyrrhula phyrrhula</i> (Bull Finch) and a small flock of 7 <i>Anthus prathensis</i> (meadow pipit).</p> <p>Mammals Likely habitat for badger, fox and rabbit. Otter was not observed during the site visits.</p>				
A. Woodland	B. Grassland	C. Tall herb/fern C.3.2 tall ruderal	D. Heathland	E. Mire
F. Swamp	G. Open water	H. Coastland	I. Rock etc < 2% rock exposures	J. Miscellaneous J.2.3. hedge mixed species. J.3.6 buildings

Dominant plant species recorded			
Abundance: DAFOR scale: D=Dominant, A+ Abundant, F+ Frequent, O=Occasional, R= Rare			
Plant species Latin	English	Species code	Abundance
Hedgerows			
Quercus robur	Oak		O
Alnus glutinosa	Alder		O
Crataegus monogyna	Hawthorn		D
Corylus avellana	Hazel		A
Sorbus aucuparia	Rowan		O
Prunus spinosa	Blackthorn		A
Illex aquifolium	Holly		R
Hedera helix	Ivy		F
Ulex europaeus	Whin		F
Betula pendula	Birch		O
Sambucus nigra	Elder		O
Salix caprea	Goat willow		F
Grasses			
Lolium perenne	Rye grass		O
Arrhenatheretum elatius	False oat grass		O
Festuca rubra	Red Fescue		O
Festuca pratensis	Meadow fescue		F
F. ovina	Sheep fescue		O
Agrostis capillaries	Common bent		F
Agrostis Curtsi	Bristle bent		A
A. Stolonifera	Creeping bent		O
Anthoxanthum odoratum	Sweet vernal grass		D
Deschampsia cespitosa	Tufted hair grass		F
Holcus lanatus	Yorkshire fog		O
Rushes			
Juncus effuses			A
Juncus inflexus			O
Flora			
Cardemine pratensis	Cuckoo flower		O
Cirsium arvense	Thistle		F
Trifolium repens	Clover		F
Bellis perennis	Daisy		F
Taraxacaum officinale	Dandelion		O
Succisa pratensis	Devils bit scabious		F
Sencio jacobacea	Ragwort		O
Prunella vulgaris	Self heal		O
Filipendula ulmaria	Meadow sweet		F
Angelica sylvestrius	Angelica		O
Achillea millefolium	Yarrow		O
Oxalis acetosa	Wood Sorrel		O
Geranium robertianum	Herb Robert		O
Geranium pratense	Meadowcranes Bill		O
Rumex acetosa	Common sorrel		O
Lotus corniculatus	Birds foot trefoil		F
Vicia cracca	Tufted vetch		O
Vicia	Vetch		O

Scrub			
Crategus monogyna	Hawthorn		D
Prunus spinosa	Blackthorn		D
Corylus avellana	Hazel		F
Ilex aquifolium	Holly		F
Lonicera periclymenum	Honetsuckle		F
Rubus fructuosa	Blackberry		F
Salix sp(p)	Willow		F
Boundary edge trees			
Fraximus excelsior	Ash		O
Crategus monogyna	Hawthorn		D
Acer pseudoplatanus	Sycamore		O
Sorbus aucuparia	Rowan		R
Prunus spinsosa	Blackthorn		F
Betula pendula	Birch		O
Quercus robur	Oak		R
Illex aquilifolium	Holly		R

11.2.4 Assessing the significance of any effects on the Natura 2000 site (step 4)

This section assesses the significance of the potential impacts identified within section 2.3. The significance of the impact is assessed in terms of the possibility of the impact affecting the integrity of the sites to the degree where they can no longer sustain and ensure the continued viability of the complex habitats and populations of species for which the sites were designated. In this context, the significance of the impacts identified at section 2.3 are now considered:

Impact	Significance
Physical changes that will flow from the plan.	Having regard to the location of significant areas of the Natura 2000 sites outside the plan area and in conjunction with the policy framework of the development plan in the areas of Natura 2000 sites located within the plan area, no significant physical changes are anticipated as a result of the plan and therefore there will be no significant impacts on the integrity of the sites.
Impacts flowing from the plan as a result of resource requirements.	There will be no land take from the sites as a result of the plan therefore there will be no significant impacts on the integrity of the sites. On completion of the Letterkenny/ Lough Mourne water supply scheme, there will be sufficient capacity in water supply to accommodate the future growth anticipated by the plan and therefore there will be no significant impacts on the integrity of the sites.
Impacts flowing from the plan as a result of emissions and waste.	The effects in relation to air quality are considered not to be significant but rather are considered to be neutral as a result of a balance between new development activities and the encouragement of sustainable transport modes particularly

	<p>in the context of the neighbourhood strategies.</p> <p>The effects in relation to the existing position for WWTW's currently pose a threat to the water quality status of the Natura 2000 sites. However, the proposed scheme to upgrade the WWTW's that is being advanced by the Directorate of Water, Environment and Emergency Services and that is contained as a policy output in the plan, will assist in improving the WFD risk categories for the sites. Therefore, whilst it is recognised that there is an existing threat to the integrity of the sites as a result of waste water treatment arrangements, it is considered that significant measures are being put in place to actively reduce the existing threat. In addition, the plan emphasises requirements for appropriate connections to the WWTW's in lieu of septic tanks/ treatment systems. Therefore, on balance it is not considered that there will be significant impacts on the integrity of the sites so long as the upgrade of the WWTW's is advanced as anticipated.</p>
Impacts flowing from the plan as a result of transport requirements.	Proposal in relation to new roads, construction of infrastructure to facilitate walking/ cycling/ public transport, are generally located in areas outside the Natura 2000 sites and therefore there will be no significant impact on the integrity of the sites.

11.2.5 Conclusions

This assessment has demonstrated that the plan may have indirect impacts on the Natura 2000 sites particularly in relation to treatment of wastewater and air quality. The outputs of the plan however, provide measures to redress any risk to the integrity of the sites and in relation to wastewater, will provide the environment for improvement of the conservation status of the sites.

It is therefore considered that there will be no significant adverse impacts on the identified Natura 2000 sites and therefore that an Appropriate Assessment is not required.

11.2.6 Consultations

The following appropriate authorities were consulted during the SEA scoping process i.e. pre- draft plan and pre- environmental report:

- Environmental Protection Agency, Regional Inspectorate.
- Department of the Environment, Heritage & Local Government, Development Applications Unit.
- Department of Communications, Energy and Natural Resources, Coordination Unit.

As a result of this consultation, the following responses (summaries of) were received:

- Department of the Environment, Heritage and Local Government: The plan should recognise the value of architectural heritage and conserve and enhance landscapes and landscape features. Architectural heritage should inform the content of the plan from the outset. Areas of special character should be identified and preserved by one or more ACA's and structures of special interest should be put forward for inclusion on the Record of Protected Structures. In respect of monitoring, qualitative indicators rather than quantitative indicators are more appropriate in adjudging subsequent environmental impacts on architectural heritage.
- Department of Communications, Energy and Natural resources: Indicated that the Department have no comments to make.