

**Natura Impact Report (NIR)**  
of the  
**Proposed Variation**  
to the  
**County Donegal Development Plan**  
**2018-2024**  
in respect of the  
**TEN-T Priority Route Improvement**  
**Project, Donegal**

**In accordance with the Requirements of Article 6 (3) of  
the EU Habitats Directive**



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

Community, Development & Planning Services  
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# 1 Introduction

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## 1.1 Background

The Donegal County Development Plan (CDP) 2018-2024 is the statutory land use plan for County Donegal, and came into effect in June 2018.

The Trans-European Transport Network ("TEN-T") is a selection of strategic transport corridors throughout the European Union (EU) that have been identified to play a key role in the mobility of goods and passengers through the EU. Three sections of the TEN-T strategic road network in Donegal have been identified and prioritised for improvement and, together, they form the TEN-T Priority Route Improvement Project, Donegal ("TEN-T PRIPD"). These sections are:

- Section 1 (N15/N13 Ballybofey / Stranorlar Urban Region);
- Section 2 (N56/N13 Letterkenny to Manorcunningham);
- Section 3 (N14 Manorcunningham to Lifford / Strabane / A5 Link).

The process of delivering the TEN-T PRIPD involves: Phase 1: Scheme Feasibility, Phase 2: Option Selection, Phase 3: Design and Environmental Evaluation, and Phase 4: Statutory Process.

Phase 1 and Phase 2 of the project have been completed to date, involving:

- Phase 1: A scheme feasibility report, which identified the need for the scheme;
- Phase 2: A preliminary options assessment to shortlist route options, the appraisal of the shortlisted options, the identification of an Emerging Preferred Option Corridor/s for each of the above sections, and finally a **Preferred Option Corridor for each section** which identify the preferred route corridors in which the road improvement schemes will take place.

In order to progress through Phase 3 and Phase 4 of the project, the Preferred Option Corridors identified in Phase 2 must be put on a statutory basis within the Donegal CDP 2018-2024. This involves varying the plan in accordance with Section 13 of the Planning and Development Act 2000 (as amended), in order to ensure that the overall project and, in particular, the preferred Option Corridors, are fully integrated into, and compatible with, this plan. This gives rise to the Proposed Variation to the CDP 2018-2024 in respect of the TEN-T PRIPD, September 2020. The Variation specifically:

- Reserves and protects the TEN-T PRIPD preferred route corridors by inserting new mapping and amending associated Objectives and Policies (e.g. T-O-1, T-P-1) and removes the corresponding historical route corridors;
- Provides the necessary strategic support for the project by inserting new text, Objectives and Policies (e.g. S-O-11 and text within Chapter 5 Infrastructure);
- Ensures compatibility between the plan and the project by amending existing Objectives and Policies (e.g. those related to railway corridors, built and archaeological heritage) and creating new project compatible zonings in Letterkenny and Ballybofey/Stranorlar;
- Amends some minor transport related matters in the plan.

The County Donegal Development Plan 2018-2024 as it stands, includes Objectives and Policies regarding progression of the TEN-T strategic road network. The Proposed Variation facilitates the TEN-T PRIPD, the project stage of this road network, to ensure its compatibility with the Donegal CDP so that it can progress to the next stage, Phase 3: Design and Environmental Evaluation.

## 1.2 Purpose of this Report

This document comprises the Natura Impact Report (NIR) of the Variation to the Donegal CDP 2018-2024, in respect of the TEN-T PRIPD, in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/443/EEC), and in accordance with the requirements of Part XAB of the Planning

and Development Act (2000), as amended. Part XAB confers an obligation on the Council, as the competent authority, to undertake Screening for Appropriate Assessment (AA) (in accordance with Section 177U) and to prepare a NIR (in accordance with Section 177T), as part of the AA required for a draft Variation of a development plan. A Screening for AA was undertaken by Donegal County Council in October 2020, and concluded that the Proposed Variation to the Donegal CDP 2018-2014, in respect of the TEN-T PRIPD, had the potential for significant effects on the Natura 2000 network of European sites within the preferred route corridors or within 15km of said corridors, either alone or in combination with other plans or projects. This NIR has been prepared to document a Stage II appraisal for Appropriate Assessment to inform the Stage II AA to be undertaken by the competent authority of the implications of the Proposed Variation to the Donegal CDP 2018-2024, in respect of the TEN-T PRIPD, on European sites, the purpose of which is to assess whether or not the likely significant effects identified at Stage I screening for AA on Natura 2000 sites will result in adverse effects on the integrity of the sites identified.

### **1.3 Statement of Authority**

RPS ecologists prepared this NIS which has been reviewed and verified by Paula Kearney. Paula is Technical Director in Ecology with RPS and holds a BSc (Hons) Ecology, is a Chartered Ecologist (CEcol) and full member of CIEEM (MCIEEM), with 19 years' experience in ecological assessment and AA.

## 2 Appropriate Assessment Methodology

### 2.1 Legislative Context

#### 2.1.1 Habitats Directive and Appropriate Assessment

Council Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora better known as the "Habitats Directive" provides legal protection for habitats and species of European importance. Articles 3 to 9 provide the legislative means to protect habitats and species of Community interest through the establishment and conservation of an EU-wide network of sites known as Natura 2000. These are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Conservation of Wild Birds Directive (79/409/ECC) as codified by Directive 2009/147/EC.

The obligation to undertake AA derives from Articles 6(3) and 6(4) of the Habitats Directive and both involve a number of steps and tests that need to be applied in sequential order. Article 6(3), which is concerned with the strict protection of sites, establishes the requirement for AA:

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

Article 6(4) states:

*"If, in spite of a negative assessment of the implications for the [European] site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted".*

The European Communities (Birds and Natural Habitats) Regulations 2011 transpose these requirements into Irish legislation.

Part XAB of the Planning and Development Act (2000), as amended, requires the Council, as the competent authority, to undertake Screening for AA (in accordance with Section 177U) and, as appropriate, to prepare a NIR (in accordance with Section 177T).

#### 2.1.2 Guidance for the Appropriate Assessment Process

AA Guidelines for Planning Authorities have been published by the Department of the Environment Heritage and Local Government (DEHLG, 2010a). In addition to the advice available from the Department, the European Commission has published a number of documents which provide a significant body of guidance on the requirements of AA, most notably including, *'Managing Natura 2000 sites – the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC'* (EC, 2019), which sets out the principles of how to approach decision making during the process, and updates the guidance taking into account current and relevant case law, including a number of recent judgements handed down in the European courts in respect of the interpretation of the Habitats and Birds Directives.

These principal national and European guidelines have been followed in the preparation of this NIR. The following list identifies these and other pertinent guidance documents:

- Communication from the Commission on the Precautionary Principle, Office for Official Publications of the European Communities, Luxembourg (EC, 2000);
- Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Articles 6(3) and (4) of the Habitats Directive 92/43/EEC. Office for Official Publications of the European Communities, Brussels (EC, 2001);
- Guidance document on Article 6(4) of the 'Habitats Directive' 92/43/EEC – Clarification of the concepts of: alternative solutions, imperative reasons of overriding public interest, compensatory measures, overall coherence, opinion of the commission; (EC, 2007);
- Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities. Department of the Environment, Heritage and Local Government, Dublin (DEHLG, 2010a);
- Department of Environment Heritage and Local Government Circular NPW 1/10 and PSSP 2/10 on Appropriate Assessment under Article 6 of the Habitats Directive – Guidance for Planning Authorities (DEHLG, 2010b);
- Interpretation Manual of European Union Habitats. Version EUR 28. European Commission (EC, 2013);
- European Commission Notice C(2018) 7621 'Managing Natura 2000 sites – the provisions of Article 6 of the 'Habitats' Directive 92/43/EEC' (EC, 2019); and
- A Guide to the Assessment of Air Quality Impacts on Designated Nature Conservation Sites (Version 1.1)' (IAQM, 2020).

### **2.1.3 Stages of Appropriate Assessment**

According to European Commission Methodological Guidance on the provisions of Article 6(3) and 6(4) of the Habitats Directive, the assessment requirements of Article 6 establish a four-staged approach as described below. An important aspect of the process is that the outcome at each successive stage determines whether a further stage in the process is required. The four stages are as follows:

- Stage I – Screening of the proposed plan or project for AA;
- Stage II – An AA of the proposed plan or project;
- Stage III – Assessment of alternative solutions; and
- Stage IV – Imperative Reasons of Overriding Public Interest (IROPI)/ Derogation.

Stages I and II relate to Article 6(3) of the Habitats Directive; and Stages III and IV to Article 6(4). The requirements for individual stages are summarised in **Table 2-1**.

**Table 2-1 Stages in the process of Appropriate Assessment**

Stage	Task
I	<p><b>Screening</b></p> <p>Screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3): i) whether a plan or project is directly connected to or necessary for the management of the site, and ii) whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives. If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage II (AA). Screening should be undertaken without the inclusion of mitigation, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered plan. The greatest level of evidence and justification will be needed in circumstances when the process ends at screening stage on grounds of no impact.</p>
II	<p><b>Appropriate Assessment</b></p> <p>This stage considers whether the plan or project, alone or in combination with other projects or plans, will have adverse effects on the integrity of a Natura 2000 site, and includes any mitigation measures necessary to avoid, reduce or offset negative effects. The proponent of the plan or project will be required to submit a Natura Impact Report/Natura Impact Statement, i.e. the report of a targeted professional scientific examination of the plan or project and the relevant Natura 2000 sites, to identify and characterize any possible implications for the site in view of the site’s conservation objectives, taking account of in combination effects. This should provide information to enable the competent authority to carry out the AA. If the assessment is negative, i.e. adverse effects on the integrity of a site cannot be excluded, then the process must proceed to Stage III, or the plan or project should be abandoned.</p>
III	<p><b>Alternative Solutions</b></p> <p>This stage examines any alternative solutions or options that could enable the plan or project to proceed without adverse effects on the integrity of a Natura 2000 site. The process must return to Stage II as alternatives will require AA in order to proceed. Demonstrating that all reasonable alternatives have been considered and assessed, and that the least damaging option has been selected, is necessary to progress to Stage IV.</p>
IV	<p><b>Imperative Reasons of Overriding Public Interest (IROPI)/Derogation</b></p> <p>Stage IV is the main derogation process of Article 6(4) which examines whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project that will have adverse effects on the integrity of a Natura 2000 site to proceed in cases where it has been established that no less damaging alternative solution exists.</p> <p>The extra protection measures for Annex I priority habitats come into effect when making the IROPI case. Compensatory measures must be proposed and assessed. The Commission must be informed of the compensatory measures. Compensatory measures must be practical, implementable, likely to succeed, proportionate and enforceable, and they must be approved by the Minister.</p>

### 2.1.4 Mitigation Measures

‘Mitigation Measures’ are not defined in the Habitats Directive or relevant Irish transposing legislation. However, case law such as *People Over Wind & Sweetman v Coillte*, (CASE C-323/17) and the Irish High Court in *Kelly v. An Bord Pleanála* (2019 IEHC 84) help to define what constitutes mitigation measures. In the *People Over Wind* decision the CJEU held that that the term should be understood as meaning any measure that is *‘intended to avoid or reduce the harmful effects of the envisaged project on the site concerned’*. Said case law has determined that mitigation measures should not be taken into account at Stage 1 Screening Stage. However, the EU guidance document *‘Managing Natura 2000 sites – the provisions of Article 6 of the ‘Habitats’ Directive 92/43/EEC* (EC, 2019), states that



*'Mitigation measures may be proposed by the plan or project proponent and/or required by the competent national authorities in order to avoid the potential impacts identified in the appropriate assessment or reduce them to a level where they will no longer adversely affect the site's integrity'.*

### **2.1.5 Consideration of *ex-situ* effects**

EC (2019) advises that Member States, both in their legislation and in their practice, allow for the Article 6(3) safeguards to be applied to any development pressures, including those which are external to European sites but which are likely to have significant effects on any of them.

The CJEU developed this point when it issued a ruling in case C-461/17 ("Brian Holohan and Others v An Bord Pleanála") that determined inter alia that Article 6(3) of Directive 92/43/EEC must be interpreted as meaning that an appropriate assessment must on the one hand, catalogue the entirety of habitat types and species for which a site is protected, and, on the other, identify and examine both the implications of the proposed project for the species present on that site, and for which that site has not been listed, and the implications for habitat types and species to be found outside the boundaries of that site, provided that those implications are liable to affect the conservation objectives of the site.

In that regard, consideration has been given in this report to implications for habitats and species located both inside and outside of the European sites considered in the screening appraisal with reference to those sites' Conservation Objectives where effects upon those habitats and/or species are liable to affect the conservation objectives of the sites concerned.

### **2.1.6 In-combination effects**

Article 6(3) of the Habitats Directive requires that in-combination effects with other plans or projects are also considered. As set out in the Commission's 2018 Notice (EC, 2019), significance will vary depending on factors such as magnitude of impact, type, extent, duration, intensity, timing, probability, cumulative effects and the vulnerability of the habitats and species concerned.

Other plans or projects which are completed, approved but uncompleted, or proposed have been considered. EC (2019) specifically advises that *"as regards other proposed plans or projects (i.e. other projects not proposed by the Applicant), on grounds of legal certainty it would seem appropriate to restrict the in-combination provision to those which have been actually proposed, i.e. for which an application for approval or consent has been introduced"*.

The assessment of in-combination effects is provided in **Section 4.4.4**.

### 3 Description of the Proposed Variation to the Donegal CDP 2018-2024 in respect of the TEN-T PRIPD

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The Trans-European Transport Network (TEN-T) is a selection of strategic transport corridors throughout the European Union (EU) that have been identified to play a key role in the mobility of goods and passengers through the EU. Three sections of the TEN-T strategic road network in Donegal have been identified and prioritised for improvement and together, they form the TEN-T PRIPD. These sections are:

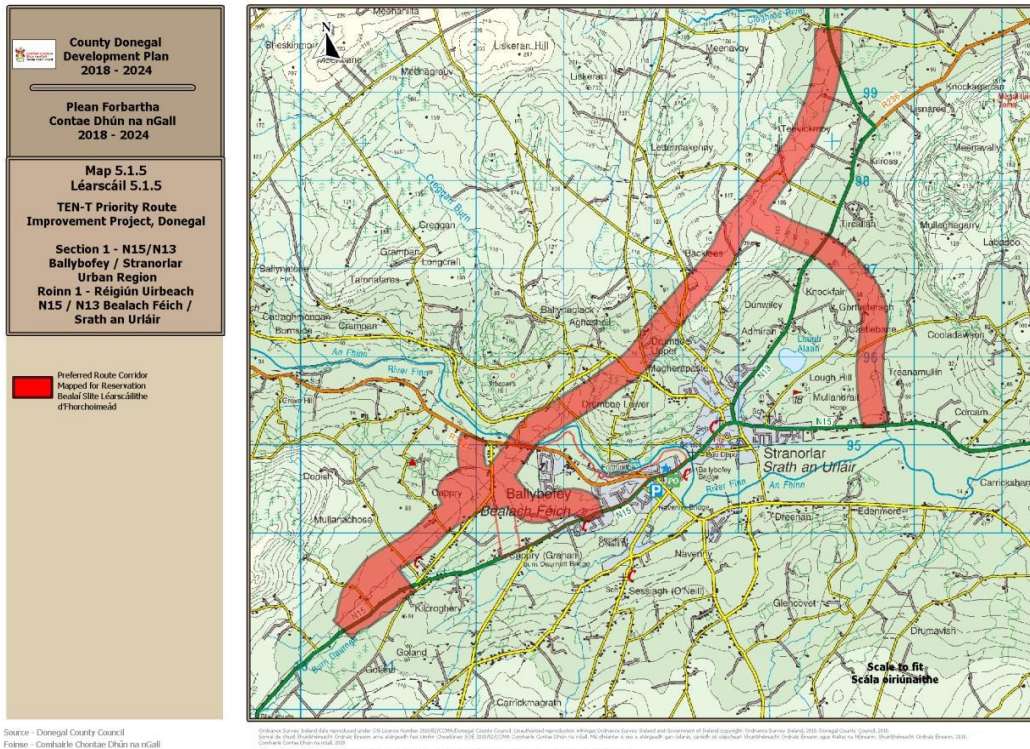
- **Section 1** (N15/N13 Ballybofey/Stranorlar Urban Region)
- **Section 2** (N56/N13 Letterkenny to Manorcunningham)
- **Section 3** (N14 Manorcunningham to Lifford/Strabane/A5 Link).

The County Donegal Development Plan 2018-2024 as it stands, includes Objectives and Policies regarding progression of the TEN-T strategic road network. The purpose of the Proposed Variation to the Donegal CDP 2018-2024 in respect of the TEN-T PRIPD is to ensure that the overall TEN-T project and, in particular, the identified preferred options corridors, are fully integrated into and compatible with the spatial frameworks, policies, and objectives of the CDP (as varied), so that the project can progress to the next stage, Phase 3: Design and Environmental Evaluation. Consequently the Variation:

- Reserves and protects the TEN-T PRIPD preferred route corridors by inserting new mapping and amending associated Objectives and Policies (e.g. T-O-1, T-P-1) and removes the corresponding historical route corridors;
- Provides the necessary strategic support for the project by inserting new text, Objectives and Policies (e.g. S-O-11 and text within Chapter 5 Infrastructure);
- Ensures compatibility between the plan and the project by amending existing Objectives and Policies (e.g. those related to railway corridors, built and archaeological heritage) and creating new project compatible zonings in Letterkenny and Ballybofey/Stranorlar;
- Amends some minor transport related matters in the plan.

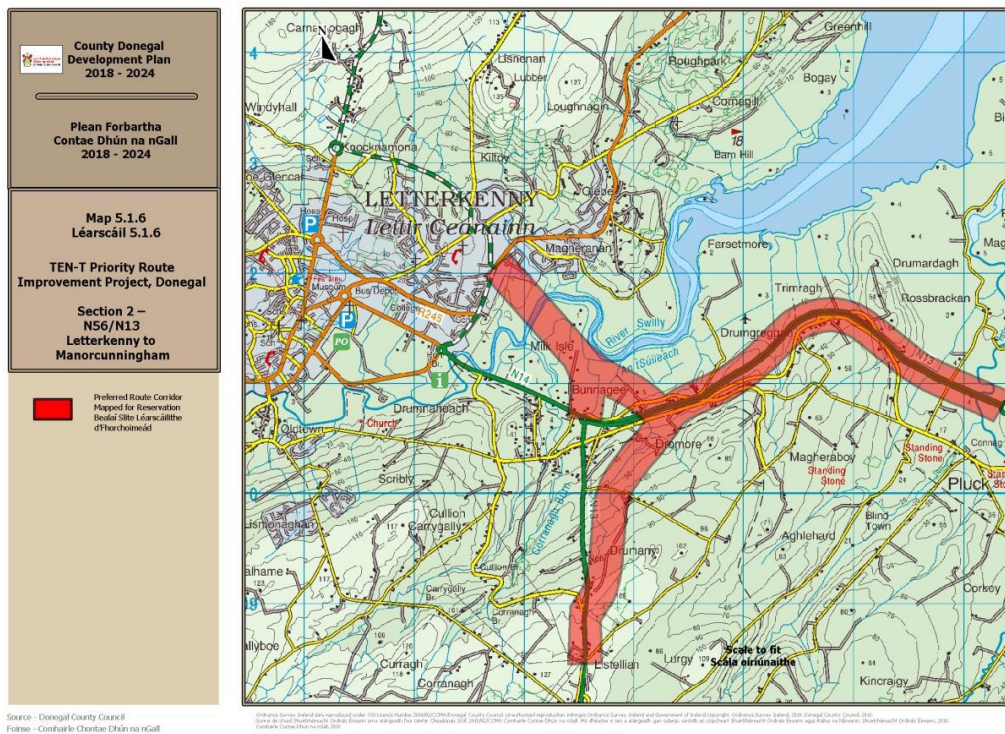
The new preferred route corridors for the TEN-T PRIPD are as follows:

- The preferred route corridor for **Section 1 (N15/N13 Ballybofey/Stranorlar Urban Region)** which, relative to the route corridor in the existing County Development Plan, generally runs to the north-west, north, and north-east of said urban region (**Figure 3-1**).



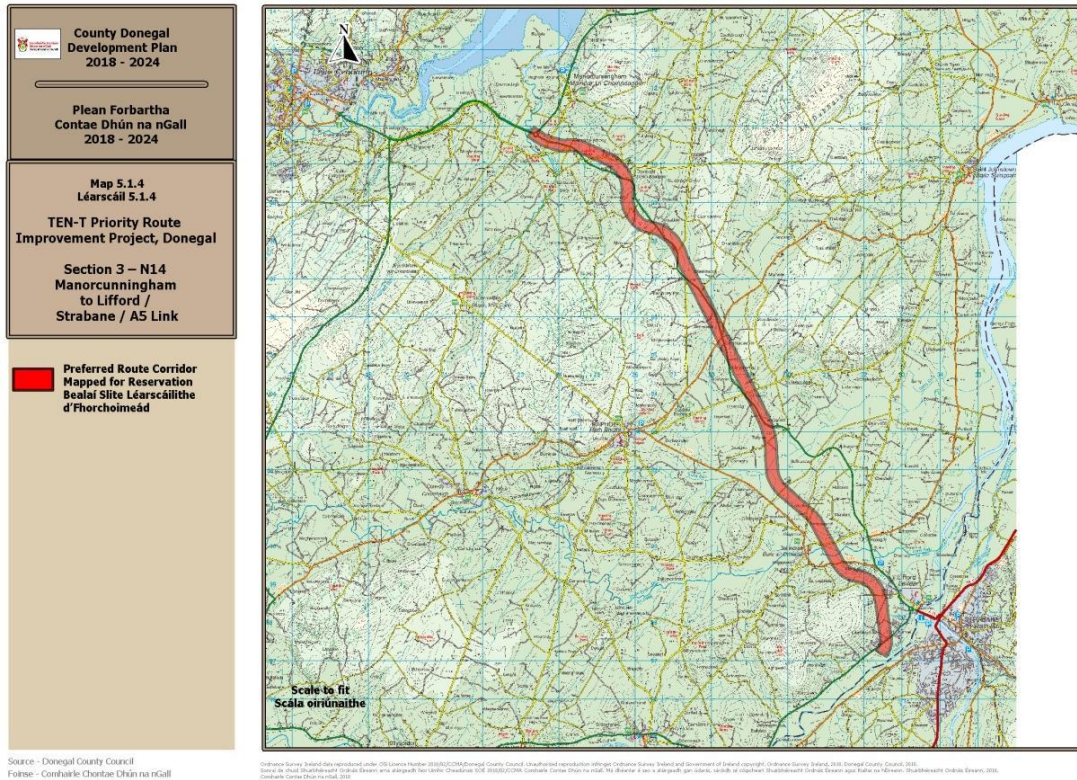
**Figure 3-1 Preferred route corridor for Section 1 (N15/N13 Ballybofey/Stranorlar Urban Region)**

The preferred route corridor for **Section 2 (N56/N13 Letterkenny to Manorcunningham)** which, relative to the route corridor in the existing County Development Plan, includes a widened section in the townlands of Bunagee and Milk Isle, and additional corridor sections in the townlands of Dromore and Drumany and along the route of the existing N14 National route (**Figure 3-2**).



**Figure 3-2 Preferred route corridor for Section 2 (N56/N13 Letterkenny to Manorcunningham)**

- The preferred route corridor for **Section 3(N14 Manorcunningham to Lifford/Strabane/A5 Link)** which has minor deviations from the route corridor shown in the existing County Development Plan (**Figure 3-3**).



**Figure 3-3 Preferred route corridor for Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link)**

A full description of the amendments included in the Proposed Variation are set out in Table A.1 of Appendix A. A total of 33 no. textual amendments and 11 no. mapping amendments to the Donegal CDP 2018-2024 have been proposed, which require assessment of their likely significant effects on the conservation objectives of European sites i.e. on SACs or SPAs, and on the integrity of the Natura network of European sites, before any decision can be made to allow the Variation to proceed.

## 4 Stage II Appraisal for Appropriate Assessment

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### 4.1 Stage I AA Screening

A Stage I AA Screening of the Proposed Variation to the Donegal CDP 2018-2024 in respect of the TEN-T PRIPD was carried out in October 2020 (*Appropriate Assessment (AA) Screening Report of the Proposed Variation to the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Improvement Project, Donegal*).

The purpose of this screening exercise was to determine whether the Proposed Variation to the CDP 2018-2024 in respect of the TEN-T PRIPD could have significant effects on the Natura 2000 network of European sites within the zone of influence of the Plan, either alone or in combination with other plans or projects, and consider whether these impacts were likely to be significant. In undertaking the screening assessment the precautionary principle was applied. It was recognised that, owing to the strategic nature of the CDP, the likely impacts arising from the Variation on European sites may be uncertain. In such circumstances detailed consideration was recommended at Stage II AA.

On the basis of objective information, and in view of best scientific knowledge, the screening report concluded that the likelihood of significant effects arising from the Proposed Variation could not be excluded beyond reasonable scientific doubt for the following European sites:

- Lough Swilly SAC;
- Lough Swilly SPA;
- River Finn SAC;
- River Foyle and Tributaries SAC;
- Lough Fern SPA; and
- Derryveagh and Glendowan Mountains SPA.

Details of these 6 no. European sites are given in Table C.1 of Appendix C, collated from information available on the National Parks and Wildlife Service website (<http://www.npws.ie>) and on the DAERA website (<https://www.daera-ni.gov.uk>). The following information has been included for each Natura site:

- Site Code;
- Site Name;
- Qualifying Interests / Special Conservation Interests; and
- Conservation Objectives.

The location of these Natura 2000 sites relative to the proposed TEN-T PRIPD route corridors is illustrated in **Figure D.1** of **Appendix D**.

In addition, the screening report concluded that the likelihood of significant in-combination effects on Natura 2000 sites arising from: completed, approved but uncompleted, or proposed (but not yet approved) projects could not be excluded at screening stage beyond reasonable scientific doubt. It was therefore concluded that the Proposed Variation to the Donegal CDP 2018-2024, in respect of the TEN-T PRIPD, should proceed to Stage II AA, including the preparation of a Natura Impact Report (NIR).

### 4.2 Consultation

The undernoted statutory bodies were notified that an NIR and an Environmental Report (ER) would be prepared, and submissions in relation to the scope and level of detail to be included in said reports were invited from same in October 2020.

- SEA Section, Environmental Protection Agency (EPA)

- Department of Housing, Local Government and Heritage (DHLGH)
- Department of the Environment, Climate and Communications (DECC)
- Department of Agriculture, Food & the Marine (DAFM)
- Department of Tourism, Culture, Arts, Gaeltacht, Sport and Media (DTCAGSM) which included the National Parks and Wildlife Service, Glenveagh National Park.
- Leitrim County Council
- Natural Environment Division, Northern Ireland Environment Agency
- Strategic Planning Directorate, Department of the Infrastructure, Northern Ireland
- Fermanagh & Omagh District Council
- Derry City & Strabane District Council

Submissions were received from the following consultees in response to these Reports:

- SEA Section, Environmental Protection Agency (EPA)
- Department of Agriculture, Food & the Marine (DAFM)
- Geological Survey Ireland (GSI)
- Northern Ireland Environment Agency
- Derry City & Strabane District Council
- Fermanagh and Omagh District Council.

These submissions are provided in Appendix B. The comments received were taken on board and incorporated into the ER and/or NIR, where possible and appropriate. Certain comments that are specific to the TEN-T PRIPD will need to be addressed at the project level.

### **4.3 Stage II Appraisal for Appropriate Assessment**

The Proposed Variation comprises 33 no. textual amendments and 11 no. mapping amendments to the Donegal CDP that must be assessed in accordance with the requirements of Article 6(3) of the EU Habitats Directive (Directive 92/43/EEC) in this report. The Stage I screening for AA focussed on the overall effect of the Proposed Variation to the CDP on Natura 2000 sites within the Zone of Influence of the proposed route corridors of the TEN-T PRIPD. Therefore, each of the proposed amendments to the Donegal CDP have been brought forward to Stage II AA.

Assessment of the amendments outlined in the Variation to the Donegal CDP (Table E.1 of Appendix E) follows the same process as that set out in the NIR of the Donegal CDP 2018-2024. Using this methodology, an impact screening matrix (Table E.1 of Appendix E of this Report) sets out the assessment of each amendment in order to determine the probability of significant impacts on the Natura 2000 network of European sites.

The impact screening matrix presents a detailed assessment under the following key headings:-

- Amendment reference and CDP Policy/Objective
- Natura 2000 site that may be affected
- Potential Impact of policy/objective
- Risk of Significant Impact
- Potential for 'In Combination Impacts'
- Risk of Significant Combination Impacts
- Mitigation

Where the assessment has determined that there is potential for a significant impact on a European site or the integrity of the Natura 2000 network, mitigation is set out in the last column.

## 4.4 Findings of Stage II Appraisal for Appropriate Assessment

The purpose of the Proposed Variation is to create a spatial and planning framework to facilitate the TEN-T PRIPD (a strategic roads project), so that said project can proceed to the statutory approval stage.

The Proposed Variation, by facilitating the TEN-T PRIPD, has the potential to give rise to adverse effects on the abovementioned Natura 2000 sites. The TEN-T PRIPD will be subject to Project Level Appropriate Assessment once the exact location and design of the scheme is finalized. Consequently, the NIR contains a strategic level assessment of the overall/strategic impact of the Proposed Variation on the identified Natura 2000 sites.

Sections 4.4.1 to 4.4.3 presents a detailed assessment of the potential for significant impacts of the various amendments comprising the Variation to the CDP on the 6 no. screened in European sites. Possible direct and indirect effects are discussed under three themes:

- Habitat Loss
- Water Quality and Habitat Deterioration
- Disturbance and Displacement

The assessment finds that, in the absence of the consideration of mitigation measures, a number of the proposed amendments comprising the Variation to the CDP, through their facilitation of the TEN-PRIPD, have the potential for likely significant effects on the Qualifying Interests of 5 no. European sites. These findings are included in Column 3 of the Impact Assessment Matrix contained at **Table E.1** in **Appendix E**.

### 4.4.1 Habitat Loss

#### 4.4.1.1 Direct Habitat Loss

Direct habitat loss of natural and semi-natural habitat is associated with the construction phase of road schemes. Habitat loss can occur in the footprint and vicinity of the road. Where habitat loss occurs in a Natura site in an area containing qualifying Annex I habitat types, this can undermine the site's conservation objective to maintain the habitat area of the qualifying habitat type.

The impact screening matrix (Table E.1 of Appendix E of this Report) has identified 3 no. European sites, where the preferred route corridors of the TEN-T PRIPD intersect the boundary of the site, with the potential for direct adverse effects via loss habitat loss at the project stage. The potential for adverse effects on these sites via this pathway is further discussed below.

#### **Lough Swilly SAC**

Lough Swilly SAC is directly intersected by the Section 2 preferred route corridor of the TEN-T PRIPD at 3 separate locations; Dromore/Bunnagee, Ballyrairie/Bunnagee and Rossbracken/Raymoghey. The assessment takes into account the entire 'option corridor', as there is no certainty at this strategic plan level as to the exact location of the road, and whether it could require land take within the site boundaries. The potential for a direct loss of habitat within Lough Swilly SAC arising from land take associated with the development of these road sections cannot be excluded. According to the site-specific conservation objectives for the site (NPWS, 2011), estuarine and potential salt marsh habitats are present where the Section 2 route corridor intersects the site at Dromore/Bunnagee and Ballyrairie/Bunnagee. In the absence of mitigation measures, there is potential for adverse effects on the attributes and targets relating to 'habitat area' and 'distribution' for these designated habitats. Otter occur throughout most of the site, and there is potential for adverse effects on attributes and targets relating to 'habitat extent', 'couching sites and holts', and 'barriers to connectivity'. There is no potential for direct adverse effects on coastal lagoons or oak woodlands, as these habitats are not present within or adjacent to the areas intersected by the proposed route corridors.

### **Lough Swilly SPA**

Lough Swilly SPA is directly intersected by the Section 2 preferred route corridor of the TEN-T PRIPD at Dromore/Bunnagee. The assessment takes into account the entire 'option corridor', as there is no certainty at this strategic plan level as to the exact location of the road, and whether it could require land take within the site boundaries. The potential for a direct loss of habitat within Lough Swilly SPA arising from land take associated with the development of this road section cannot be excluded. According to the site-specific conservation objectives for Lough Swilly SAC (NPWS, 2011), estuarine and potential salt marsh habitats are present where the Section 2 route corridor intersects the site at Dromore/Bunnagee. In the absence of mitigation measures, there is potential for adverse effects on the attribute and target relating to 'habitat area of wetland habitat' supporting the SCI bird species at the site. The habitats within the study area may also support the SCI bird species and there is potential for *ex-situ* effects to SPAs as per Article 4(4) of the Birds Directive and as referred to in Section 2.1.5 above.

### **River Finn SAC**

River Finn SAC is directly intersected by the Section 1 and Section 3 preferred route corridors of the TEN-T PRIPD in the townlands of Cappry, Ironworks and Drumboe Lower and in the townland of Curragalane, Lifford, respectively. The assessment takes into account the entire 'option corridor', as there is no certainty at this strategic plan level as to the exact location of the road, and whether it could require land take within the site boundaries. The potential for a direct loss of habitat within River Finn SAC arising from land take associated with the development of these road sections cannot be excluded. Although known areas of the designated habitats Blanket Bogs, North Atlantic Wet Heaths and Transition mires are not situated within or adjacent to the proposed route corridors, the conservation objectives for the site (NPWS, 2017) state that these habitats have not been mapped in detail for this site and therefore, in the absence of any mitigation measures, the potential for adverse effects on the attributes and targets relating to 'habitat area' and 'distribution' of these habitats cannot be excluded. There is no potential for direct impacts on the conservation objectives of the lake habitat Oligotrophic waters, found within several lakes upstream of the proposed route corridors.

#### **4.4.1.2 Habitat Damage and Disturbance**

Movements of machinery and personnel during construction can cause compaction and damage leading to the degradation of habitat quality. Placement of excavated material directly on the habitat surface can also lead to damage, including during temporary storage and also when the excavated deeper soil and surface vegetated material is lifted for replacement in excavations.

Marine, wetland and peatland habitats depend on specific hydrological conditions, and are particularly vulnerable to disturbance. For example, peat soils can be locally destabilised during construction of projects. Should any construction activities take place within or adjacent to a Natura site boundary, there is potential for damage to, or disturbance of, designated habitat.

Invasive species can have a major negative impact on native biodiversity. When non-native species become invasive, they can transform ecosystems and threaten native and endangered species. The most prominent negative effect of invasive species, in terms of ecology, is competition with native biota and alteration of habitats. Habitat removal, in particular along riparian corridors, can encourage the spread of invasive species by the creation of edge effects, and the direct introduction of non-native plant species by transfer of vector material on construction vehicles or equipment or washed downstream. The spread of invasive species within a Natura site may occur if transferred there at construction stage. As implementation of the TEN-T PRIPD may include the requirement for construction works adjacent to watercourses, the potential to spread invasive species that may be present cannot be excluded.

The impact screening matrix (Table E.1 of Appendix E of this Report) has identified 3 no. European sites, where the preferred route corridors of the TEN-T PRIPD either intersect the boundary, or are



situated adjacent to the boundary of a Natura site, with the potential for indirect adverse effects via habitat damage and disturbance or the spread of invasive species. The potential for adverse effects on these sites via this pathway is further discussed below.

### **Lough Swilly SAC**

Lough Swilly SAC is directly intersected by the Section 2 preferred route corridor of the TEN-T PRIPD at 3 separate locations; Dromore/Bunnagee, Ballyraine/Bunnagee and Rossbracken/Raymoghey. In addition, large sections of Section 2 and Section 3 preferred route corridors are situated adjacent to the site. According to the site-specific conservation objectives for the site (NPWS, 2011), estuarine and potential salt marsh habitats are present within these areas of the SAC. In the absence of mitigation measures, the potential for adverse effects on the attributes and targets relating to 'habitat area' and 'distribution' for these designated habitats via damage and disturbance cannot be excluded.

### **Lough Swilly SPA**

Lough Swilly SPA is directly intersected by the Section 2 preferred route corridor of the TEN-T PRIPD at Dromore/Bunnagee. In addition, large sections of Section 2, as well as the Section 3 preferred route corridor are situated adjacent to the site. According to the site-specific conservation objectives for Lough Swilly SAC (NPWS, 2011), estuarine and potential salt marsh habitats are present within these areas of the SAC. In the absence of mitigation measures, the potential for adverse effects on the attribute and target relating to 'habitat area of wetland habitat' supporting the SCI bird species at the site via damage and disturbance cannot be excluded. The habitats within the study area may also support the SCI bird species and there is potential for ex-situ effects to SPAs as per Article 4(4) of the Birds Directive.

### **River Finn SAC**

River Finn SAC is directly intersected by the Section 1 and Section 3 preferred route corridors of the TEN-T PRIPD in the townlands of Cappry, Ironworks and Drumboe Lower and in the townland of Curragalane, Lifford, respectively, while areas of these Sections are also situated adjacent to the site. Although known areas of the designated habitats Blanket Bogs, North Atlantic Wet Heaths and Transition mires are not situated within or adjacent to the proposed route corridors, the conservation objectives for the site (NPWS, 2017) state that these habitats have not been mapped in detail for this site and therefore, in the absence of any mitigation measures, the potential for adverse effects on these habitats via damage and disturbance cannot be excluded. There is no potential for indirect impacts on the conservation objectives of the lake habitat Oligotrophic waters, found within several lakes upstream of the proposed route corridors.

## **4.4.2 Water Quality and Habitat Deterioration**

A number of potential impacts on water quality and aquatic species of downstream European sites may result from the implementation of the TEN-T PRIPD. The potential for adverse effects at the project stage via this pathway could not be excluded for 4 no. European sites that are intersected by, or lie downstream of, the preferred route corridors.

### **4.4.2.1 Sedimentation**

Excavation works related to the construction phase of road schemes, and the associated storage of excavated spoil material, can pose a significant risk for sediment release into surface water drainage channels, streams and rivers. Instream works for construction can also pose a significant risk of sediment release. Ground damage from construction vehicles and machinery can also cause rutting and increased erosion of soils. Access tracks used during construction may affect surface run-off patterns, creating alternative flow paths, promoting erosion and localised flooding. Hydrological connectivity between a construction site and a downstream Natura site is a key factor which affects the risk of erosion and subsequent delivery of sediment to a designated wetland site. Some of the key concerns with elevated levels of sediment include the impact on spawning fish, through issues including the

sedimentation of spawning gravels, clogging of fish gills and reduction in dissolved oxygen (Acornley & Sear, 1999; Sear *et al.*, 2008; Collins *et al.*, 2011).

Increased sediment supply and the potential for associated degradation in water quality could lead to adverse effects on European sites intersected by, or situated downstream of the preferred route corridors of the TEN-T PRIPD. The impact screening matrix (Table D.1 of Appendix D of this Report) has identified 4 no. European sites, where the preferred route corridors of the TEN-T PRIPD intersect, or lie upstream of the site, with the potential for indirect adverse effects via sedimentation and associated degradation in water quality. The potential for adverse effects at the project stage on these sites via this pathway is further discussed below.

### **Lough Swilly SAC**

Lough Swilly SAC is directly intersected by the Section 2 preferred route corridor of the TEN-T PRIPD at 3 separate locations; Dromore/Bunnagee, Ballyraine/Bunnagee and Rossbracken/Raymoghey. In addition, large sections of the Section 2 and Section 3 preferred route corridors are situated adjacent to, or upstream of, the site. In the absence of any mitigation measures, the potential for adverse effects on water quality from sedimentation arising from the construction phase of the TEN-T PRIPD cannot be excluded. This has potential to indirectly impact upon attributes and targets relating to 'community distribution' of estuarine habitat, 'physical structure' and 'vegetation structure and composition' of salt marsh habitat, and 'fish biomass available' to otter.

### **Lough Swilly SPA**

Lough Swilly SPA is directly intersected by the Section 2 preferred route corridor of the TEN-T PRIPD at Dromore/Bunnagee. In addition, large sections of the Section 2 and Section 3 preferred route corridors are situated adjacent to, or upstream of, the site. In the absence of any mitigation measures, the potential for adverse effects on water quality from sedimentation arising from the construction phase of the TEN-T PRIPD cannot be excluded. This has potential for adverse effects on the attribute and target relating to 'habitat area of wetland habitat' supporting the SCI bird species at the site.

### **River Finn SAC**

River Finn SAC is directly intersected by the Section 1 and Section 3 preferred route corridors of the TEN-T PRIPD in the townlands of Cappry, Ironworks and Drumboe Lower and in the townland of Curraghane, Lifford, respectively. Furthermore, large sections of these preferred route corridors are situated upstream of the site. In the absence of any mitigation measures, the potential for adverse effects on water quality from sedimentation arising from the construction phase of the TEN-T PRIPD cannot be excluded. This has potential for adverse effects on the attribute and target for Atlantic salmon relating to 'water quality', and the attribute and target for Otter relating to 'fish biomass'.

### **River Foyle and Tributaries SAC**

At its closest point, River Foyle and Tributaries SAC is situated adjacent to the southernmost point of the Section 3 preferred route corridor at Curraghane, Lifford. In addition, parts of the site are situated downstream of both the Section 3, and the Section 1 preferred route corridors. In the absence of any mitigation measures, the potential for adverse effects on water quality from sedimentation arising from the construction phase of the TEN-T PRIPD cannot be excluded. This has potential for adverse effects on the conservation objective for Atlantic salmon 'to maintain and, if possible enhance, the extent and quality of suitable salmon habitat - particularly the chemical and biological quality of the water and the condition of the river channel and substrate'; the conservation objectives for Water courses of plain to montane levels 'to improve water quality and improve channel substrate quality by reducing siltation'; and the conservation objective for otter 'to maintain the extent and quality of suitable Otter habitat, in particular the chemical and biological quality of the water and all associated wetland habitats'.

#### **4.4.2.2 Hydrocarbons**

Hydrocarbons are products made from crude oil such as machinery fuels and lubricants. Leaks of these contaminants into watercourses can have serious impacts on aquatic species, particularly fish. Oil spillage and leaks are a common source of hydrocarbon contamination of groundwater and surface water (Manoli and Samara, 1999). A pollution event can occur as a result of poorly maintained vehicles and machinery including portable generators and accidental spillage during re-fuelling of same.

When hydrocarbons are released into the environment as a result of accidental spillages, there may be some fractions that float on top of the water, forming a thin surface film. Other heavier fractions may sink through the water column and accumulate in the sediment at the bottom of the waterbody, which may affect bottom feeding fish and organisms.

The release of hydrocarbons into the aquatic environment can result in chronic impacts upon water dependent species downstream in a Natura site. The potential impacts include disruption to neurosensors, abnormal behaviour and development issues as well as direct impacts upon fertility. Oil spills can reduce the capacity of a water body to exchange oxygen as well as result in oil coating the gills of aquatic species causing lesions on respiratory surfaces. This can result in significant respiratory difficulties for aquatic organisms. Benthic invertebrates can be adversely affected if fractions of hydrocarbons settle and accumulate in sediments. This can result in the mortality of populations and prevent future colonisation (Bhattacharyya *et al.*, 2003), which could also impact upon SCI bird species feeding on these organisms.

The impact screening matrix (Table E.1 of Appendix E of this Report) has identified 4 no. European sites, where the preferred route corridors of the TEN-T PRIPD intersect, or lie upstream of the site, with the potential for indirect adverse effects through a degradation in water quality. The potential for adverse effects on these sites at the project stage via this pathway has been discussed in detail in Section 4.5.2.1 for degradation in water quality owing to sedimentation. In the absence of any mitigation measures, the potential for adverse effects on water quality from hydrocarbons arising from both the construction phase and operational phase (via road runoff) of the TEN-T PRIPD cannot be excluded, with the potential for adverse effects on European sites as outlined in Section 4.5.2.1.

#### **4.4.3 Disturbance and Displacement**

##### **4.4.3.1 Birds**

Some bird species may be temporarily displaced from suitable habitat by the presence of machinery and personnel during construction. Indirect loss of wintering habitats for bird species of conservation concern in Ireland (Colhoun and Cummins, 2013) may occur if they do not use traditional feeding or roosting sites during construction of road projects. Some species may also be displaced from suitable habitat by the noise and visual effects of traffic during the operational phase of road projects.

##### **Lough Swilly SPA**

Lough Swilly SPA is directly intersected by the Section 2 preferred route corridor of the TEN-T PRIPD at Dromore/Bunnagee. In addition, large sections of Section 2, as well as the Section 3 preferred route corridor are situated adjacent to the site. In the absence of any mitigation measures, the potential for disturbance and displacement of SCI bird species at this site arising from the construction or operational phases of the TEN-T PRIPD, including potential impacts on migratory pathways, cannot be excluded. This has the potential for adverse effects at the project stage on the attributes and targets relating to 'population trends' and 'distribution' for the 24 no. SCI bird species at the site.

##### **Lough Fern SPA**

Lough Fern SPA is situated approximately 9.21km from the nearest preferred route corridor, and there is not considered to be any potential for either direct impacts or water quality impacts on the site owing to the distance and the lack of hydrological connectivity. The Special Conservation Interest of the site,

Pochard, is a migratory species, wintering at the site. It is considered that, in the absence of any mitigation measures, the potential for displacement of this species from migratory pathways, arising from the construction or operational phases of the TEN-T PRIPD, cannot be excluded. This has the potential for adverse effects at the project stage on 'population density' of the species at this site.

#### **Derryveagh and Glendowan Mountains SPA**

Derryveagh and Glendowan Mountains SPA is situated approximately 13km from the nearest preferred route corridor. There is not considered to be any potential for either direct impacts or water quality impacts on the site owing to the distance and the lack of hydrological connectivity. Although the Special Conservation Interests of the site can be migratory, a review of the site information (NPWS, 2014) has determined that the 5 no. SCI species for which the site was designated are breeding residents at the site. On this basis, the potential for likely significant effects on these species arising from displacement effects from migratory pathways can be excluded.

#### **4.4.3.2 Otter**

Otter are sensitive to disturbance from people and machinery working at a site, and may avoid areas where works are being undertaken. Construction works have potential to adversely affect habitat use by otter, which require lying up areas throughout their territory. Otter may also be displaced from suitable habitat by the noise and visual effects of traffic during the operational phase of road projects.

#### **Lough Swilly SAC**

Lough Swilly SAC is directly intersected by the Section 2 preferred route corridor of the TEN-T PRIPD at 3 separate locations; Dromore/Bunnagee, Ballyraine/Bunnagee and Rossbracken/Raymoghey. In addition, large sections of Section 2 and Section 3 preferred route corridors are situated adjacent to the site. In the absence of any mitigation measures, the potential for disturbance and displacement of otter at this site arising from the construction or operational phases of the TEN-T PRIPD cannot be excluded. Otter occur throughout most of the site (NPWS, 2011); disturbance to the species has the potential for adverse effects at the project stage on the attribute and target relating to 'distribution of the species within the site'.

#### **River Finn SAC**

River Finn SAC is directly intersected by the Section 1 and Section 3 preferred route corridors of the TEN-T PRIPD in the townlands of Cappry, Ironworks and Drumboe Lower and in the townland of Curragalane, Lifford, respectively, while areas of these Sections are also situated adjacent to the site. In the absence of any mitigation measures, the potential for disturbance and displacement of otter at this site arising from the construction or operational phases of the TEN-T PRIPD cannot be excluded. Otter occur throughout most of the site (NPWS, 2017); disturbance to the species has the potential for adverse effects at the project stage on the attribute and target relating to 'distribution of the species within the site'.

#### **River Foyle and Tributaries SAC**

At its closest point, River Foyle and Tributaries SAC is situated adjacent to the southernmost point of the Section 3 preferred route corridor at Curragalane, Lifford. In the absence of any mitigation measures, the potential for disturbance and displacement of otter at this site arising from the construction or operational phases of the TEN-T PRIPD cannot be excluded. Otter occur throughout most of the site; disturbance to the species has the potential for adverse effects at the project stage on the conservation objective to 'maintain and, if possible increase, population numbers and distribution within the site' (DAERA, 2017).

#### 4.4.4 In-Combination Effects

Article 6(3) of the Habitats Directive requires that in-combination effects with other plans or projects are considered. Where a plan or project is likely to have a significant effect on a European site, either alone or in-combination with other plans or projects, it is subject to AA.

The assessment of potential for in-combination effects aims to identify at this early stage any possible significant in-combination or cumulative effects/impacts of the Proposed Variation with other plans and projects on the six identified European sites.

The AA Screening Report of the Proposed Variation to the CDP in respect of the TEN-T PRIPD considered a number of plans that may interact with the Proposed Variation, with potential to lead to in-combination or cumulative effects on Natura 2000 sites. This detailed assessment is provided below and does not identify any potential significant in-combination effects on the Natura 2000 network arising from other relevant plans and projects. These findings are included in Columns 5 and 6 of Table E.1 Impact Assessment Matrix in Appendix E.

#### Existing County Donegal Development Plan 2018-2024

The Proposed Variation is a variation to the existing County Donegal Development Plan 2018-2024. Both the draft plan and subsequent material alterations to the plan were subject to AA including the preparation of detailed NIRs which concluded that the plan would not have any direct, indirect or cumulative significant effects on Natura 2000 sites. Therefore it is not likely that the existing County Development Plan will result in any significant in-combination effects on the Natura 2000 network.

#### Project Ireland 2040: National Planning Framework

The National Planning Framework (NPF) is a high level strategic plan for shaping the growth and development of the Country to 2040. It is a framework for the preparation of other plans such as Regional Spatial and Economic Strategies (RSEs) and other statutory land-use plans such as City and County Development Plans and Local Area Plans. It is a region focused strategy for managing growth with a new major policy emphasis on compact growth and regeneration targeting infill and brownfield sites, renewing and developing existing settlements rather than continual expansion and sprawl of cities and towns, with a strengthened and more environmentally focused planning at local level. In particular, it identifies Letterkenny as a one of a number of regional centres that are to lead the development of their respective regions.

The NPF is centred on 10 national policy objectives known as 'National Strategic Outcomes', one of which is Enhanced Regional Accessibility. This strategic outcome emphasizes the importance of accessibility between key urban centres of population and their regions, ensuring that all regions and urban areas in the country have a high degree of accessibility to Dublin, as well as to each other. Within said objective, the NPF specifically cites the importance of accessibility to the northwest border area utilising existing routes (N2/N14/A5) and progressive development of the Atlantic Economic Corridor including upgrading the N15/N13 link.

The conclusion of the AA of the NPF was that it would not adversely affect the integrity of a European site (whether individually or in-combination with other plans or projects). In addition, all plans and projects informed by the NPF will be subject to Stage 1 AA screening and Stage 2 AA as required. Therefore it is not likely that the National Planning Framework will result in any significant in-combination effects on the Natura 2000 network.

#### National Development Plan 2018-2024

The National Development Plan (NDP) sets out the investment priorities that will underpin the implementation of Ireland's infrastructural commitments as set out in the NPF, over the next 10 years, through a total investment of approximately €166 billion. The NDP contains 10 corresponding 'Strategic Investment Priorities' to support the NPF's 10 'National Strategic Outcomes'. Resource allocation for projects which support the 'Strategic Investment Priorities' will be allocated through four funds, of which energy and climate change projects are seen as the key priority. The "N15 Ballybofey Bypass",

“N13/N14/N56 Letterkenny Bypass and Dual Carriageway to Manorcunningham” and the “N14 Manorcunningham to Lifford” are all listed as priorities for investment within the NDP. Although it is not a land use plan, it guides relevant funding streams at National, Regional and Local Level, and thus provides a framework within which many operational and other plans are placed. Projects funded under the NDP will be subject to planning law and will be subject to Stage 1 AA screening and Stage 2 AA as required. Therefore, given the nature of the goals and objectives of the NDP, their close alignment with and supportive approach to other plans, in particular the NPF, it is unlikely that the NDP will result in any significant in-combination effects on the Natura 2000 network.

### **Regional Spatial and Economic Strategy (RSES) for the Northern and Western Regional Assembly**

The Northern and Western Regional Assembly made the first Regional Spatial and Economic Strategy for the Northern and Western Region on the 24th January 2020, and it has immediate effect. The RSES provides a framework which County Development Plans and Local Area Plans must be consistent with. Donegal County Council will be required to review the County Donegal Development Plan 2018-2024, within a specified time period, to determine whether the Plan is consistent with the RSES or whether it is necessary to amend or vary the Development Plan. The objective of the RSES is to support the implementation of the NPF and the economic policies and objectives of the Government by providing a long-term planning and economic framework which shall be consistent with the NPF and the economic policies or objectives of the Government. It provides a structured hierarchy for integrated control of spatial development. In particular is an objective of the RSES to deliver the TEN-T PRIPD by 2028. (RPO 3.7.30 refers). The suite of spatial plans, at National, regional and local level, are highly integrated and hierarchical in their implementation in order to optimise sustainable environmental outcomes. The Natura Impact Report of the RSES concluded that it would not adversely affect the integrity of a European site (whether individually or in combination with other plans or projects) subject to application of all of the mitigation measures identified in the NIR.

### **Draft National Energy and Climate Plan 2021-2030**

In accordance with the Governance of the Energy Union and Climate Regulation, Ireland submitted its first Draft National Energy and Climate Plan 2021-2030 (NECP) to the European Commission in December 2018. The Draft NECP outlines Ireland’s energy and climate policies developed to date, the projected levels of population and economic growth identified in the NPF and the climate and energy measures outlined in the NDP. It identifies the need for cross-sectoral policies in order for Ireland to achieve a renewable electricity share of 70% by 2030 and carbon neutrality by 2050 in line with European and International objectives. The Draft NECP is strategic in nature underpinning Ireland’s national climate and energy policies and measures and therefore it is not likely that the Draft NECP will result in any significant in-combination effects on the Natura 2000 network.

### **Climate Action Plan 2019**

The primary objective of the Climate Action Plan (CAP) is for Ireland to meet its EU targets to reduce its carbon emissions by 30% between 2021 and 2030 and to achieve zero carbon emissions by 2050. This is an ambitious target based on 180 actions across all sectors of the economy. The CAP sets out a co-ordinated plan to make optimum use of Ireland’s significant renewable resources. Currently 30% of Ireland’s electricity comes from renewable resources. Under the provisions of the CAP it is envisaged that this will increase to 70% by 2030 in line with EU and International targets. This increase in renewable energy production will require significant new infrastructure including increased offshore wind development. The CAP is strategic in nature underpinning Ireland’s commitment to meeting its EU targets to deliver 30% reduction in carbon emissions by 2030 and developing a roadmap to carbon neutrality by 2050. Therefore, it is not likely that the CAP will result in any significant in-combination effects on the Natura 2000 network.

### **National Adaptation Framework: Planning for a Climate Resilient Ireland, January 2018**

The National Adaptation Framework (NAF) follows on from the work carried out previously under the National Climate Change Adaptation Framework in 2012. The NAF sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. Under the requirements of the NAF, a number of Government Departments are required to

prepare Sectoral Adaptation Plans in relation to priority areas, work on which is currently underway. In addition, the NAF is strategic in nature, outlining adaptation actions to avoid or reduce the adverse impacts of climate change and to anticipate possible future changes and therefore it is not likely that the NAF will result in any significant in-combination effects on the Natura 2000 network.

### **Strategy for Renewable Energy 2012–2020**

The Strategy for Renewable Energy covers Ireland's renewable energy policy up to 2020. It is a high level Strategy, underpinned by the detailed National Renewable Energy Action Plan (NREAP) with a focus on achieving Ireland's 16% renewable energy target by 2020. This Strategy sets out five strategic goals with regard to, increasing on and offshore wind, building a sustainable bioenergy sector, fostering research and development in renewables such as wave and tidal, growing sustainable transport and building out robust and efficient networks. The Strategy is strategic in nature underpinning Ireland's ambitious renewable energy targets outlined in the NREAP and therefore it is not likely that the Strategy will result in any significant in-combination effects on the Natura 2000 network.

### **Government White Paper: Ireland's Transition to a Low Carbon Energy Future 2015-2030**

The Government's White Paper on Energy Policy sets out a vision and framework to guide energy policy to 2030 with the aim to improve Ireland's renewable energy target and reduce carbon emissions in accordance with the EU objective of a low carbon society by 2050. The White Paper states that a radical transformation of Ireland's energy system is required to meet climate policy objectives. The aim is to reduce Ireland's greenhouse gas emissions by between 80% and 95%, compared to 1990 levels, by 2050, and to zero or below by 2100. This is the first time the Government has proposed the elimination of fossil fuels from Ireland's energy system. The White Paper outlines Ireland's long-term energy policy framework with a stated objective to guide a transition to a low carbon energy system in line with European and international climate change objectives and agreements as well as national policies and objectives. Therefore it is not likely that the White Paper will result in any significant in-combination effects on the Natura 2000 network.

### **National Renewable Energy Action Plan 2010**

The provisions of the Renewable Energy Directive 2009/28/EC require each Member State to adopt National Renewable Energy Action Plans setting out the individual Member States share in energy from renewable resources which will be consumed in transport, electricity, heating and cooling in 2020. Ireland submitted its National Renewable Energy Action Plan (NREAP) to the European Commission in July 2010. It set out measures which the Government considers necessary to achieve Ireland's 16% target by 2020. The target is to be achieved from a 12% share of renewable energy in heat and cooling, a 10% share in renewable energy in transport, and a 42.5% renewable energy share in electricity. Substantial renewable infrastructure will be required to achieve these agreed European targets. The NREAP is strategic in nature outlining measures to achieve Ireland's renewable energy targets in line with EU targets. Therefore it is not likely that the NREAP will result in any in- significant combination effects on the Natura 2000 network.

### **Donegal Local Economic and Community Plan**

The Donegal Local Economic and Community Plan 2016-2022 (LECP) is a 6 year Plan and sets out the objectives and actions needed to promote and support both the economic development and the local community development of the County. Although it is not a land use plan, it guides relevant funding streams within Donegal at a European, National, Regional and Cross Border Level, and thus provides a framework within which many operational and other plans are placed. Screening of the LECP for Strategic Environmental Assessment and for AA concluded that the plan is not likely to have significant effects on the environment in general, or on the Natura 2000 network in particular. Values underpinning the LECP include sustainability, and collaborative planning. It recognizes natural resources, landscape, and environment as key assets within the County, and the threat posed by overdevelopment. The large network of conservation sites is recognized as integral to Donegal as an environmental exemplar, and for learning, and tourism. One of the plan goals is to protect, enhance and promote the natural environment of County Donegal. The goals of the LECP aligns closely with the core strategy of the CDP. Actions arising from these goals are supportive of the CDP and its policies and objectives. The LECP sets out high level 'soft' objectives in terms of the physical environment. It seeks

to implement these objectives through support and promotion of implementation of other plans, including the CDP, LAPs, Regional Waste Management Plan and River Basin Management Plan. In relation to spatial planning the LECP's express goal is to utilise existing resources to facilitate effective spatial planning in the region. Therefore, given the nature of its goals and objectives, their close alignment with and supportive approach to other plans, in particular the CDP, it is unlikely that the LECP will result in any significant in combination effects on the Natura 2000 network.

### **Ireland's Forestry Programme 2014-2020**

The objective of the programme is to meet the needs of Ireland's forestry sector and it sets down a series of measures that are the basis of the programme including afforestation, forest infrastructure such as roads, management, and native woodland conservation. The Forest Service is Ireland's national forest authority with responsibility for overseeing the development of public and private forestry in Ireland in a manner that is compatible with the protection of the environment. Through a licensing and consent system, the Forest Service regulates the main forestry activities and adherence to a range of standards, guidelines and requirements is mandatory. Individual forestry proposals are assessed for potential impact before consent or licence. The Forestry Standards Manual November 2015, and the Environmental Requirements for Afforestation December 2016, require that in relation to European sites, the Forest Service will undertake screening and where necessary, appropriate assessment, and can only approve the project if it is satisfied that it will not adversely affect the integrity of the Natura site, either alone or in combination with other plans or projects. The Forestry Programme has undergone a full Appropriate Assessment. This included an assessment conclusion that in combination impacts with the Border Regional Planning Guidelines were not likely. The tight regulation of the forestry sector and the mitigation put in place mean that it is unlikely that the programme will not result in any significant in combination effects on the Natura 2000 network.

### **The Regional Development Strategy for Northern Ireland 2035**

The Regional Development Strategy for Northern Ireland 2035 - Building a Better Future is designed to reinforce and strengthen the hubs, corridors and gateways making best use of regional assets to accommodate growth. It seeks to increase links with neighbouring regions and capitalise on trans-regional development opportunities. The RDS 2035 defines the North West as Londonderry, Strabane and Limavady, along with the greater part of County Donegal. It describes Derry City as the core settlement and as a key cross-border and international gateway providing access by road, rail and sea to the North West. The National Spatial Strategy has identified a number of key areas for consideration in a spatial context, including the potential for co-operation on key strategic planning issues with Northern Ireland. Spatial planning in the border region of Ireland and Northern Ireland reflect this integrated cohesive approach. Donegal in particular has an extensive boundary with Northern Ireland with significant implications in the context of the Variation. The Regional Development Strategy recognises the relevance of co-ordinating spatial planning in Cross Border areas. Specific policies and objectives are also contained within the CDP for the protection of Natura 2000 sites within Northern Ireland. The North West Strategic Growth Partnership is a cooperative cross border initiative, jointly led by Donegal County Council and Derry City & Strabane District Council to realise the full potential of the North West City Region and is an approach that is consistent with the objectives for the region set out in the National Spatial Strategy and the Regional Development Strategy as well as the Regional Planning Guidelines. Consequently it is considered that the Regional Development Strategy for Northern Ireland 2035 will not result in any significant in combination effects on the Natura 2000 network.

### **River Basin Management Plan 2018-2021**

The primary objective of the Water Framework Directive (WFD) is to achieve good status for all waters by specified deadlines as set out in River Basin Management Plans (RBMPs). Ireland is required to produce a river basin management plan under said Directive. The Plan sets out the actions that Ireland will take to improve water quality and achieve 'good' ecological status in water bodies (rivers, lakes, estuaries and coastal waters) by 2027. The plan provides for the following actions:

- Improved waste water treatment: €1.7 billion in investment by Irish Water in over 250 waste water treatment projects between 2017 and 2021. This will help improve water quality and prevent deterioration of quality in targeted water bodies, including 'protected areas'.



- Conservation and leakage reduction: Irish Water will implement important measures to make water use more sustainable and efficient, reducing leakage in our water network from 45% of all water produced down to 37% by 2021, based on 2017 figures.
- Scientific assessments of water bodies and implementation of local measures by 43 new, specialist, local authority investigative assessment personnel: they will carry out scientific assessments of water bodies and lead on local implementation measures.
- A new collaborative Sustainability and Advisory Support Programme: this partnership between the State and the dairy industry, consisting of 30 Sustainability Advisers, will promote best farming practice in 190 areas chosen for action, for up to 5,000 farmers.
- Dairy Sustainability Initiative to help improve water quality: 18,000 dairy farmers to receive advice on sustainable farming practices in the 190 areas for action.
- The development of water and planning guidance for local authorities: this will help local authorities to consider the risks to water quality during planning and development decision-making.
- Extension of the Domestic Waste Water Treatment Systems grant scheme: the scheme will assist with the costs of septic tank remediation in High Status water areas.
- A Blue Dot Catchments Programme: the new programme will create a network of excellent river and lake areas. Agencies will work together to protect or restore excellent water quality in these water bodies.
- A new Community Water Development Fund: this will enable and support community water initiatives.

In view of the specific actions aimed to improve water quality and achieve ecological status in the plan it is considered that this will not result in any significant in combination effects on the Natura 2000 network.

### **The Marine Strategy Framework Directive**

The Marine Strategy Framework Directive (MSFD) requires EU Member States to achieve 'Good Environmental Status' for their marine waters by 2020, as judged against a range of 11 biodiversity and pressure related descriptors. Thus, national aquaculture strategies must ensure that aquaculture does not have negative impacts in terms of non-indigenous species, eutrophication, seafloor integrity, concentrations of contaminants (both in the water generally and in seafood specifically), populations of commercial fish or marine litter. The MSFD Programme of Measures (PoMs), was submitted to the European Commission in July 2016, and the main purpose of the PoMs is to put in place actions and measures which will support the meeting of the environmental targets set out under Article 10, leading to the achievement (or maintenance) of 'Good Environmental Status' (GES). The Habitats Directive, Birds Directive, and the MSFD are inter-related in that they share a common overall goal of conserving biodiversity, and their objectives are complementary. Management measures taken to achieve the conservation objectives within Natura 2000 sites, and conversely targets set to achieve GES under the MSFD are mutually supportive; therefore it is not likely that the Directive will result in any significant in combination effects on the Natura 2000 network.

### **Seven Strategic Towns Local Area Plan 2018-2024**

The Seven Strategic Towns Local Area Plan is a statutory land use plan, and sets out a spatial and policy based planning framework for the towns of An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs. The plan provides residential zonings totalling 12.99ha, intended to deliver an additional 156 residential units in the urban area of Ballybofey/Stranorlar. The plan also provides additional zonings for *inter alia* Economic Development, Town Centre Development and a number of Opportunity sites which provide for a mixture of retail, commercial and tourism developments within said urban area. However the plan identifies and makes specific reference to the River Finn Special Area of Conservation and Policy Gen-EH-2 seeks to ensure that development proposals do not damage/destroy any sites designated for their wildlife/habitat significance including European and National Legislation including Natura 2000 sites.

Furthermore, the NIR prepared for the Local Area Plan concluded that the plan would not have a significant effect on the Natura 2000 site network. Consequently it considered that there will not be any significant in combination effects on the Natura 2000 network as result of the plan.

### **Draft Letterkenny Plan**

Donegal County Council are currently drafting a Local Area Plan for Letterkenny. In line with the designation of Letterkenny as a Regional Centre in the NPF and the RSES the preferred strategic growth proposition envisaged for the plan is for Letterkenny to develop into a future city of +35,000 population and be a regional economic driver in the North West City Region. Following extensive public consultation 9 strategic themes for the plans have been established for the plan namely: Sustainable neighbourhoods, rebalancing the footprint, regenerate and infill, choice in housing location and type, a strong town centre improve liveability through our natural assets, prioritise key physical infrastructure, plan for public transport and support economic development through place making.

The TEN-T PRIPD Section 2 Preferred Route Corridor identified in the Proposed Variation will provide for both a new strategic infrastructure link across the River Swilly between the N56 at Ballyraine and the N13 as well as an improved alignment to the N13 National Route.

Based on the above it is likely that the Proposed Variation will affect/influence the Draft Letterkenny Plan in the following overall ways:

- Facilitate the future growth of Letterkenny as a Regional economic driver for the North West through the provision of key physical infrastructure which will improve the efficiency and capacity of the road network and allow it to compete for inward investment.
- Improving liveability by reducing traffic congestion, journey times and air pollution caused by congestion queuing.
- Facilitating sustainable modes of transportation (e.g. buses, walking and cycling) by segregating strategic traffic from local traffic, freeing up road space and easing traffic congestion generally.
- Influencing the location and quantum of new commercial and residential development.

An Appropriate Assessment of the plan including, as necessary, the preparation of an NIR involving the assessment of the implications of the plan individually and in combination with other plans and projects on European Sites, will be carried out in due course.

### **Draft Strategy for the Derry City and Strabane District Local Development Plan 2032**

The proposed Derry City and Strabane District Local Development plan will provide a policy framework and land use proposals to implement the strategic objectives of the Northern Ireland Regional Development Strategy and guide development decisions within Derry City and Strabane District up to 2032. When adopted it will replace the current Derry Area Plan 2011 and the Strabane Area Plan 2001. The LDP draft Plan Strategy (dPS) was published in December 2019. The strategy identifies a number of strategic objectives including; Economic: Creating Jobs and Promoting Prosperity, Social: Accommodating People and Facilitating Communities, Environment: Enhancing the Environment, Creating Places and Improving Infrastructure. The strategy cites the importance of Derry City as the regional growth centre(s) for the North West and Strabane as a main hub town. The plan strategy is to provide enough land to accommodate and facilitate the provision of approximately 9,000 dwellings and 15,000 jobs, with associated services and infrastructure for up to 160,000 people. The strategy was the subject of a Habitats Regulations Assessment Report which concluded that the Plan Strategy will have no adverse effect on the integrity of any international sites. Consequently it is considered that the plan strategy is not likely to result in any in combination effects on the Natura 2000 network.

### **Projects with Potential for In-combination effects**

As identified in **Section 4.4**, habitat loss, water quality and habitat deterioration, disturbance and displacement are identified as potential impacts arising from the Proposed Variation. The issue of deteriorating water quality is an issue concerning a number of watercourses within the Proposed Variation area including the poor water quality status of the River Finn and River Deelee.

In addition to the abovementioned plans, there are several known projects including roads, residential, infrastructural and industrial, located within the 15km zone of influence of the preferred route corridors that are currently at various stages of planning or construction that may have in-combination or cumulative effects with the TEN-T PRIPD. The road projects considered as part of this assessment are summarised in **Table 4.1** and other relevant projects are listed in **Table 4.2** with the locations shown in **Figure 4-1**.

The potential for the Proposed Variation to have in-combination effects in association with said projects is assessed in the conclusion that follows this table.

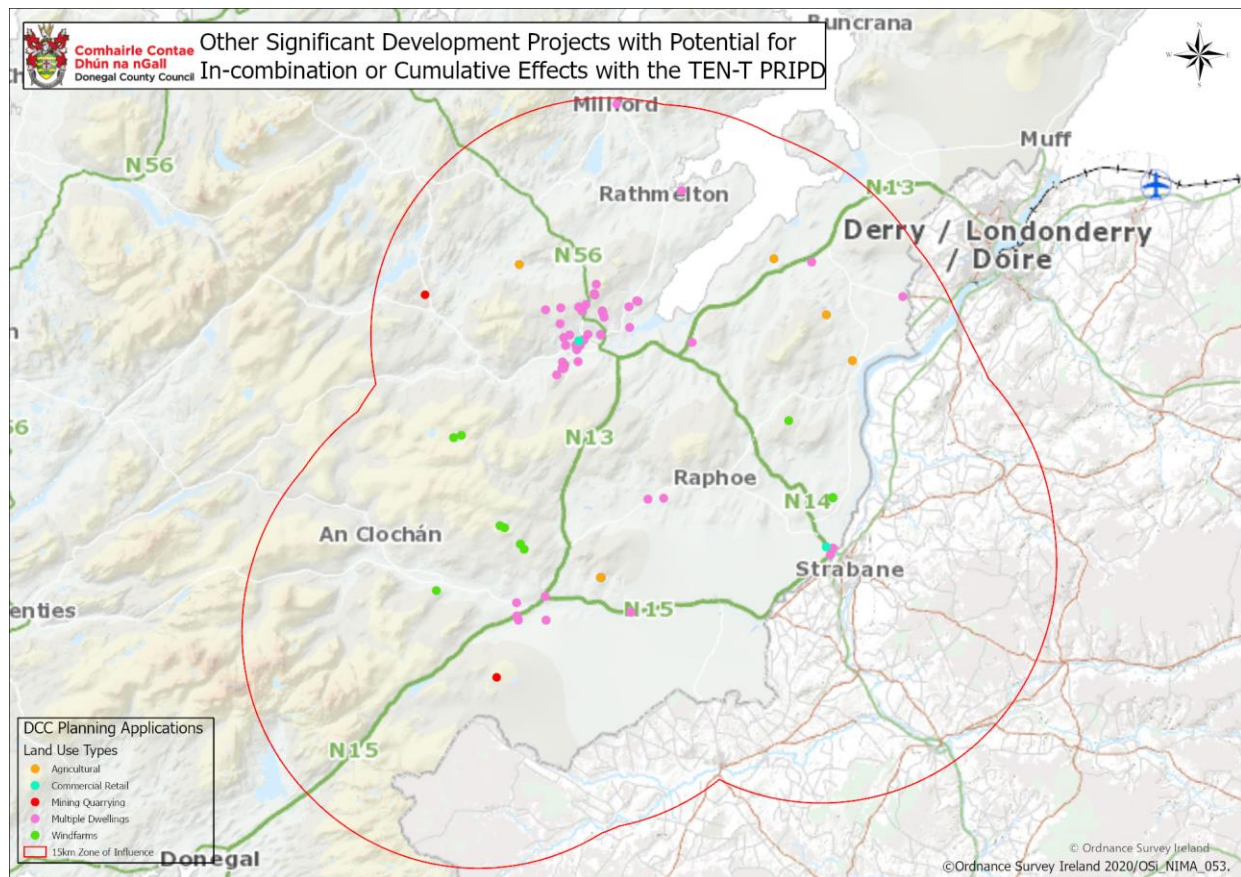
**Table 4.1 Other Projects’ Potential for In-Combination or Cumulative Effects with the TEN-T PRIPD**

Road Projects	Planning Stage	Proximity to TEN-T PRIPD Road project Section
Ballybofey / Stranorlar Western Link Road	At Tender/Construction	Section 1
Four Lane Road, Letterkenny	At Tender/Construction	Section 2
Joe Bonnar Link	At Tender/Construction	Section 2
Port Bridge Roundabout/Polestar Junction: 2021 (check with Cahal Moss)	At Tender/Construction	Section 2
Justice Walsh Junction: 2020/2021	At Tender/Construction	Section 2
N14/N15 to A5 Link (Approved 2012, ABP Ref. 05.HA003)	Schemes through or in the Planning Process	Section 3
Town Centre (Cathedral One-way) Part 8 Planning is in place	Schemes through or in the Planning Process	Section 2
A5 Western Transport Corridor	Advancing through the Statutory Process	Section 3
A2 Buncrana Road, Derry	Advancing through the Statutory Process	Section 3
N2 Clontibret to the Border	Early Planning Process	Section 3
N2 Ardee to South of Castleblaney	Early Planning Process	Section 3
Northwest Greenway	Early Planning Process	Section 3
Southern Relief Road, Letterkenny	Early Planning Process	Section 2
N13 Bridgend	Early Planning Process	Section 2
<b>Wastewater Treatment Plants</b>		
<p>The Ballybofey-Stranorlar Wastewater Treatment Plant (WWTP) was assigned as a “priority area” requiring improvements in the EPA Urban Waste Water Treatment in 2017 report.</p> <p>The Letterkenny Wastewater Treatment Plant, WWTP was upgraded in 2012 and Irish Water and Donegal County Council commenced work on Phase 3 of the Letterkenny sewerage scheme in September 2018.</p> <p>The Lifford WWTP and Raphoe WWTP were assigned as a “priority area” requiring improvements in the EPA Urban Waste Water Treatment in 2017 report.</p>		Section 1
		Section 2
		Section 3
<b>Local Planning Applications</b>		
<p>Due to the large geographical scale of the Proposed Variation study area, individual planning applications are too numerous to list.</p> <p>However, Donegal County Council has only adopted/permitted completed or approved but uncompleted plans/projects, and will only adopt/permit proposed plans/projects, where it has been, and will be, satisfied that such projects adhere to national and European legislation.</p>	Various stages of planning	All Sections

Furthermore the Council will ensure that such project, if consent is granted, will comply with their planning approvals in respect of measures designed to avoid adverse impacts on European and nationally protected sites.

**Table 4.2 Other Significant Development Projects with Potential for In-combination or Cumulative Effects with the TEN-T PRIPD (within 15km Zone of Influence of the Preferred Route Corridors)**

Development Type	No. of Projects
Multiple Residential	53
Quarries	2
Wind Energy Related	10
Commercial $\geq 1000m^2$	2
Agricultural $\geq 2500m^2$	6



**Figure 4-1 Map of Other Significant Development Projects with Potential for In-combination or Cumulative Effects with the TEN-T PRIPD (within 15km Zone of Influence of the Preferred Route Corridors)**

### Conclusion of In-combination Effects

Following the strategic level in-combination effects assessment, it has been concluded that there is no potential for adverse effects on European sites, arising from the implementation of the CDP Variation acting in combination with any other plan or projects for the following reasons:

- Donegal County Council as a competent authority has only adopted/permitted completed or approved but uncompleted plans/projects, and will only adopt/permit proposed plans/projects, where it has been, and will be, satisfied that: such projects adhere to national and European legislation. Furthermore the Council will ensure that such project, if consent is granted, will comply with their planning approvals in respect of measures designed to avoid adverse impacts on such sites.
- A number of strategies, policies and objectives are set out in the Donegal County Development Plan 2018-2024 (CDDP) for the protection of the natural environment. Chapter 5 Water and Environmental Services provides strategic aims, policies and objectives which set out requirements for developments to take cognisance of mechanisms which safeguard receptors from water, flooding and groundwater protection, specifically Policies and Objectives including WES-O-4, WES-O-5, WES-O-6, WES-P-4, WES-P-8, F-O-1, F-O-2, F-O-3, F-P-1, F-P-2, F-P-4, F-P-5 and F-P-6. In addition, Chapter 7 (The Natural and Built Heritage) and Chapter 10 (The Marine Resource and Coastal Management) objectives and policies encompass and identify the requirement of proposed developments to take cognisance of the various national and European legislation ensuring that plans and projects avoid adverse effects to European sites. Objectives specifically within the plan aimed at protection of qualifying interests of designated sites include; NH-O-1, NH-O-2, NH-O-3, NH-O-4, NH-O-5, NH-O-6, NH-O-7, NH-O-8, NH-O-10 and MRCM-O-2. Specific policies within the plan aimed at protection of qualifying interests of designated sites include; NH-P-1, NH-P-2, NH-P-3, NH-P-4, NH-P-5, NH-P-8, NH-P-9, NH-P-10, NH-P-11, NH-P-17 and BH-P-12. The relevant policies and objectives are provided in **Table 4.3**.

Therefore, adherence to the overarching policies and objectives of the Donegal County Development Plan 2018-2024 ensure that plans and projects comply with the core strategy of proper planning and sustainability and with the requirements of relevant EU Directives and environmental considerations, there is no potential for adverse in combination effects on European Sites.

**Table 4.3 Donegal County Development Plan 2018-2024 Policies and Objectives for the Protection of the Natural Environment**

Donegal County Development Plan 2018-2024 Policies and Objectives
<p><b>5.2.3 Water and Environmental Services Objectives:</b></p> <p><b>WES-O-4:</b> To implement the EU Water Framework Directive through the implementation of the appropriate River Basin Management Plan and Programme of Measures as it affects Donegal.</p> <p><b>WES-O-5:</b> To maintain, protect, improve and enhance the quality of surface waters and ground waters in accordance with the Programme of Measures contained within the relevant River Basin Management Plan.</p> <p><b>WES-O-6:</b> To provide for environmental protection, through:</p> <ul style="list-style-type: none"> <li>• The protection of surface water and ground water from pollution in accordance with the relevant River Basin Management Plan, Groundwater Protection Scheme and Source Protection Plans for public water supplies;</li> <li>• The protection against soil contamination;</li> <li>• Minimising air and noise pollution;</li> <li>• Supporting remediation of all existing pollution; and</li> <li>• Ensuring full compliance with relevant EU Directives, and National and European Policies and Regulations and through monitoring and control of relevant activities.</li> </ul>
<p><b>5.4.2 Flooding Objectives</b></p> <p><b>F-O-1:</b> To assess all development proposals in accordance with 'The Planning System and Flood Risk Management</p>

**Donegal County Development Plan 2018-2024 Policies and Objectives**

- Guidelines for Planning Authorities', (DoEHLG, 2009).

**F-O-2:** To adopt a sequential approach to flood risk management when assessing the location for new development based on avoidance, substitution, justification, and mitigation of flood risk.

**F-O-3:** To ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management and to comply with Articles 6 of the Habitats Directive and have regard to the relevant conservation objectives, qualifying interest and threats to the integrity of Natura 2000 site.

**5.4.3 Flooding Policies**

**F-P-1:** It is a policy of the Council to ensure that all development proposals comply with 'The Planning System and Flood Risk Management - Guidelines for Planning Authorities', November 2009, DoEHLG. In doing so the planning authority shall:

- Assess developments in accordance with the Sequential approach and precautionary principle set out the in the Planning System and Flood Risk Management – Guidelines for Planning Authorities'; and
- Utilise the Draft Flood Risk Management Plans (and any associated flood risk mapping) prepared as part of the CFRAMS programme, or any other flood risk datasets or mapping it considers appropriate, in assessing flood risk.

**F-P-2:** It is a policy of the Council to require applicants/developers to submit, where appropriate, an independent 'Flood Risk Assessment' in accordance with the Flood Risk Management Guidelines, DEHLG, 2009 or any subsequent related publication and/or 'Surface Water Drainage Calculations', from suitably qualified persons.

**F-P-4:** It is a policy of the Council not to permit development where flood or surface water management issues have not been, or cannot be, addressed successfully and/or where the presence of unacceptable residual flood risks remain for the development, its occupants and/or property or public infrastructure elsewhere including, inter alia, up or downstream.

**F-P-5:** It is a policy of the Council to promote the use of Sustainable Urban Drainage Systems (SUDs), flood attenuation areas, the controlled release of surface waters and use of open spaces and semi permeable hard surfaces for appropriate development proposals.

**F-P-6:** It is a policy of the Council to consider the development of long and short-term flood remediation works, including embankments, sea defences, drainage channels, and attenuation ponds to alleviate flood risk and damage to livelihoods, property and business subject to environmental considerations including potential impact on designated shellfish water and, fresh water pearl mussel catchment areas, compliance with Article 6 of the Habitats Directive, best practice in Coastal Zone Management and the Marine Resource and Coastal Management policies of this Plan.

**7.1.2 Natural Heritage Objectives**

**NH-O-1:** To protect, sustainably manage and enhance the rich biodiversity of County Donegal for present and future generations.

**NH-O-2:** To comply with Article 6 of the Habitats Directive (92/43/EEC) and have regard to the relevant conservation objectives, management plans, qualifying interests and threats to the integrity of Natura 2000 sites.

**NH-O-3:** To maintain the conservation value of all existing and/or proposed SACs, SPAs, NHAs and RAMSAR sites including those plant and animal species that have been identified for protection under the EU Habitats Directive (92/43/EEC), EU Birds Directive (79/409/EEC as amended by 2009/147/EC), the Wildlife Acts (1976-2014) and the Flora Protection Order (2015).

**NH-O-4:** To ensure the protection and management of the landscape in accordance with current legislation, ministerial and regional guidelines and having regard to the European Landscape Convention 2000.

**NH-O-5:** To protect, manage and conserve the character, quality and value of the landscape having regard to the proper planning and development of the area, including consideration of the scenic amenity designations of this plan, the preservation of views and prospects and the amenities of places and features of natural, cultural, social or historic interest.

**NH-O-6:** To protect and improve the integrity and quality of Designated Shellfish Waters, and Freshwater Pearl Mussel Basins and to take account of any relevant Shellfish Reduction Program or Fresh Water Pearl Mussel Sub-basin Plan.

**NH-O-7:** To protect the areas of Especially High Scenic Amenity from intrusive and/or unsympathetic developments.

**NH-O-8:** To ensure where appropriate the protection and conservation of hedgerows, stone walls and traditional field boundaries as natural heritage corridors and migration routes for wildlife where they are shown to play a significant heritage role.

**Donegal County Development Plan 2018-2024 Policies and Objectives**

**NH-O-10:** To maintain and restore ecosystems and to conserve valuable or threatened habitats and species in order to prevent further loss of biodiversity and to meet the EU’s target to halt biodiversity loss by 2020 through the implementation of the EU Biodiversity Strategy (2011) or as updated.

**7.1.3 Natural Heritage Policies**

**NH-P-1:** It is a policy of the Council to ensure that development proposals do not damage or destroy any sites of international or national importance, designated for their wildlife/habitat significance in accordance with European and National legislation including: SACs, Special SPAs, NHAs, Ramsar Sites and Statutory Nature Reserves.

**NH-P-2:** It is the policy of the Council to protect the habitats of species listed for protection through the prevention and management of the spread of invasive plant and animal species in the County in accordance with European and National legislation.

**NH-P-3:** It is a policy of the Council to require the consideration of Designated Shellfish Waters and their Shellfish Pollution Reduction Programmes in all development proposals that fall within their catchment.

**NH-P-4:** It is a policy of the Council to require the consideration of Freshwater Pearl Mussel and any relevant Freshwater Pearl Mussel Sub-basin Plans in all development proposals that fall within their basin of catchment.

**NH-P-5:** It is a policy of the Council to require consideration of the impact of potential development on habitats of natural value that are key features of the County’s ecological network and to incorporate appropriate mitigating biodiversity measures into development proposals.

**NH-P-8:** It is the policy of the Council to safeguard the scenic context, cultural landscape significance, and recreational and environmental amenities of the County’s coastline from inappropriate development.

**NH-P-9:** It is the policy of the Council to manage the local landscape and natural environment, including the seascape, by ensuring any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of the area.

**NH-P-10:** It is a policy of the Council to retain and protect significant stands of existing trees/hedgerows/woodlands and seek increased planting of native trees where appropriate in new developments.

**NH-P-11:** It is a policy of the Council to seek the protection of stone wall boundaries where they are shown to play a significant heritage role. Where the demolition of such stone walls is unavoidable, the reinstatement of stone walls at revised location/set back within the site using agreed local materials and techniques, will be required.

**NH-P-17:** It is a policy of the Council to seek to preserve the views and prospects of special amenity value and interest, in particular, views between public roads and the sea, lakes and rivers. In this regard, development proposals situated on lands between the road and the sea, lakes or rivers shall be considered on the basis of the following criteria:

- Importance value of the view in question.
- Whether the integrity of the view has been affected to date by existing development.
- Whether the development would intrude significantly on the view.
- Whether the development would materially alter the view.

In operating the policy, a reasonable and balanced approach shall be implemented so as to ensure that the policy does not act as a blanket ban on developments between the road and the sea, lakes and rivers.

**10.2 Marine Resource and Coastal Management Objectives**

**MRCM-O-2:** To safeguard and improve and the health of our Marine ecosystem by:

- Protecting the qualifying habitat and species of Natura 2000 sites through Appropriate Assessment of development proposals.
- Maintaining and improving water quality in our estuaries and seas by implementing River Basin Management Plan and any future programmes under the Marine Strategy Framework Directive.
- Ensuring that there is; sufficient sewage treatment capacity to serve development in urban areas, adequate on-site effluent treatment to EPA standards for developments in rural/serviced areas, and adequate pollution control measures for commercial/industrial development.

Seeking best practice measures in relation to the carrying out of site preparation and construction works for developments in close proximity to rivers and the sea.

The findings of the in-combination effects assessment is included in **Table E.1** Impact Assessment Screening Matrix in **Appendix E**.

## 5 Avoidance and Mitigation

### 5.1 Introduction

The purpose of the Proposed Variation is to create a spatial and policy framework to facilitate the TEN-T PRIPD so that it can proceed to the statutory approval stage. By facilitating the TEN-T PRIPD the Proposed Variation has the potential to give rise to adverse effects on the Qualifying Interests of 5 no. European sites which cannot be excluded in the absence of the consideration of mitigation measures. It is therefore necessary to outline measures to provide mitigation for these potential adverse effects.

It is not possible and nor is it appropriate at the strategic plan level assessment stage, to prescribe detailed and location-specific project level measures required to avoid significant adverse effects on the European sites. National and European Law and the Policies and Objectives of the Donegal CDP 2018-2024 currently requires compliance with relevant EU Directives and environmental considerations and compliance with the provisions of the Habitats Directive and other European and national legislation will continue to be required if the Proposed Variation is adopted.

As well as the mitigation measures outlined in this Section, the TEN-T PRIPD will be subject to an application to ABP and will require AA and EIA. The project will be subject to ABP being satisfied that the project complies with European Law including the relevant Directives as transposed into Irish Law along with Irish legislation. The project level AA will assess in further detail the potential for direct and indirect effects of the TEN-T PRIPD on the European sites assessed in this report and outline any project-level mitigation necessary for protection of those sites under Article 6(3) and all domestic implementing legislation. In turn the project will only be approved if the Board is satisfied that the project will not adversely affect the integrity of the site concerned in accordance with Article 6(3) of the Habitats Directive, the Birds Directive and otherwise complies with the environmental protection policies of the County Donegal Development Plan 2018-2024 in respect of the protection of the European sites.

Furthermore in implementing the project the Council will adhere to the Natura 2000 related environmental protection policies and objectives contained in the County Donegal Development Plan 2018-2014. In this regard objective NH-O-1 of the Donegal CDP 2018-2014 requires compliance with Article 6 of the Habitats Directive (92/43/EEC) and regard to be had to the relevant conservation objectives, management plans, qualifying interests and threats to the integrity of Natura 2000 sites. Indeed, all Policies and Objectives of the Plan and their implementation are subject to compliance with Article 6 of the Habitats Directive and to the full range of considerations that may apply for compliance with the Birds Directive, the EIA Directive, the SEA directive and relevant national legislation (see Part A: Appendix 1 Legal, Interpretation and Policy Context Section 1.4 of the CDP).

An exact location and detailed design for the TEN-T PRIPD has not yet been finalised. However, in line with the mitigation hierarchy detailed in **Table 5-1** below it is possible to identify the following overall avoidance and mitigation strategy to prevent adverse effects on the integrity of the Natura 2000 sites concerned:

- Avoidance.
- Mitigation at the Project level.
- Mitigation Through TII Guidance For Road Schemes.

The mitigation hierarchy shown in **Table 5-1** highlights the need to focus on the avoidance and minimising aspects of mitigation.



**Table 5-1 Mitigation Hierarchy**

Measure	Description
<b>Avoidance</b>	Seek options that avoid harm to ecological features (for example, by locating project on an alternative site).
<b>Mitigation</b>	Adverse effects should be avoided or minimised through mitigation measures, either through the design of the project or subsequent measures that can be guaranteed – for example, through a condition or planning obligation.
<b>Compensation</b>	Where there are significant residual adverse ecological effects despite the mitigation proposed, these should be offset by appropriate compensatory measures.
<b>Enhancement</b>	Seek to provide net benefits for biodiversity over and above the requirements for avoidance, mitigation or compensation.

## 5.2 Avoidance

The exact location and detailed design of the TEN-T PRIPD has not yet been finalized. However in accordance with the mitigation hierarchy the TEN-T PRIPD can be located and designed in a manner that avoids significant adverse effects on the European Sites identified in this NIR of the Proposed Variation. In this regard the footprint, land take requirements, structures and bridges, drainage system, construction compounds, borrow pits and deposition areas related to the project will be designed and laid out in a manner which aims to avoid such potential impacts as: the loss or fragmentation of habitat, impacts on water quality or disturbance or displacement of species (e.g. parts of Section 2 Preferred Route Corridor where it encroaches into the Lough Swilly SAC and SPA). Also, the construction of clear span bridges on the River Finn and Lough Swilly can help to avoid direct impacts on Natura 2000 sites, landscape treatments (such as berms and planting) can help to avoid significant visual and noise impacts and resulting disturbance to humans, flora and fauna and the design of lighting can be optimized to avoid light overspill on to European sites.

## 5.3 Mitigation at the Project Level

Measures are required to avoid significant impacts on Natura 2000 sites. These are typically referred to as “mitigation.” A high-level overview of project level mitigation measures is included here for reference only as the design for the TEN-T PRIPD has not yet been finalised. It should be noted that mitigation measures will be a central component of the design process for the project.

The principal measure at a project-specific level is that the predicted adverse environmental effects should be considered further during the detailed planning and design of the TEN-T PRIPD, when the specifics of the options can be optimised through detailed feasibility studies and design in order to limit the potential impacts on sensitive receptors. Further environmental studies based on the more detailed designs and construction methodologies should be undertaken as appropriate. These studies may involve, but are not limited to, marine, aquatic and terrestrial ecology surveys, ornithological and bat surveys, fish surveys, landscape and visual assessments, geotechnical investigations and heritage surveys. Should Stage I screening and Stage II AA undertaken at the project level identify the potential for adverse effects that may prevent the achievement of conservation objectives for the Qualifying Interests of any European site, mitigation measures will be proposed to ensure that does not happen. This will be informed by the detailed surveys and assessments, as required

The preferred route corridors identified in the Proposed Variation do intersect or contain: Natura 2000 sites, other terrestrial and marine habitats, residential properties, watercourses, built heritage structures, archaeological heritage, and sensitive landscape features and the scheme may impact on same. However the preferred route corridors provide scope to locate the project in a manner that

would significantly reduce the impact on a range of environmental receptors and assets. For example: the road scheme can be located within the corridor in a manner that maximizes the setback from Natura 2000 sites, avoids certain woodlands or other natural habitats, avoids certain built and archaeological heritage features (e.g. structures on the RPS, NIAH and Record of Monument and Places) and minimizes landscape/visual impacts.

All works and planning of works should be undertaken with regard to the environmental setting. All relevant legislation, licensing and consent requirements, and recommended best practice guidelines should be considered within the design and implementation of any project arising from the Proposed Variation to the Donegal CDP 2018-2024.

Before any works are carried out, detailed method statements and management plans (construction and environmental) should be prepared, including timing of works, information on the specific mitigation measures to be employed for each works area, and mechanisms for ensuring compliance with environmental legislation and statutory consents. Contractors should be required to prepare Construction Environmental Management Plans (CEMPs), which would include a requirement for related plans to be prepared, as appropriate, for project implementation, such as Erosion and Sediment Control, Invasive Species Management, Emergency Response, Traffic and Safety Management, Dust and Noise Minimisation, and Stakeholder Communication Plans.

Monitoring of project-level mitigation measures should be undertaken during and after works, to ensure effectiveness.

### **Habitat Loss**

Direct habitat loss within European sites will be avoided for new-build infrastructure.

Where construction occurs within a designated site, sensitive construction techniques will be used to minimise the potential impact, such as the use of bog mats for machinery access.

Ecological monitoring will be undertaken at sensitive sites during construction, as appropriate. Such sites will be identified on a case by case basis.

Restricted working areas will be imposed to ensure minimal disturbance to sensitive habitats.

Re-distribute vegetation and soil stripped from the construction areas to provide a seedbank and do not re-seed with Perennial Ryegrass.

Land within the working area will be reinstated to its former condition or as near as is reasonably practicable.

Appropriate surveys should support an assessment and conclusion of whether elements of the project will adversely affect the Conservation Objectives supporting the Favourable Conservation Status of the designated habitats or habitats supporting the designated species of Natura 2000 sites, and thus adversely affect the integrity of the site. Any element of the project that will adversely affect the integrity of any Natura 2000 site as a result of habitat fragmentation or loss, either alone or in combination with any other plans or projects, will not be approved and an alternative will be implemented which avoids this impact.

### **Water Quality**

As part of the design phase of the TEN-T PRIPD, the project will assess the construction and operational phase risks to water quality.

In all cases where works have the potential to impact on protected surface water or riparian habitats within or upstream of a Natura site, measures must be put in place to manage and minimise the risk of escape of elevated levels of suspended solids or polluting substances into watercourses.

Develop, implement and enforce an Erosion and Sedimentation Control Plan (ESCP) where risks are identified to downstream European sites.

The ESCP must include sufficient pollution control measures to prevent run-off, silt, hydrocarbons or any other harmful substances or substrates from entering any surrounding surface waters.

Storage facilities would contain and prevent the release of fuels, oils and chemicals associated with plant, refuelling and construction equipment into the environment.

All protective coatings used would be suitable for use in the aquatic environment and used in accordance with best environmental practice.

Develop, implement and enforce a Water Pollution Prevention and Environmental Emergency Response Plan for all work sites. This should include good site practices as described in NIEA Pollution Prevention Guidance and applicable CIRIA Technical Guidance (CIRIA, 2001; CIRIA, 2006) including methods and procedures to deal with any spills and the timely reporting of incidents.

- Silty water will be collected in settlement ponds prior to discharge to watercourses.
- All works involving open cut crossings shall be carried out during the period May to September to avoid interruption of salmonid spawning runs, spawning, incubation of eggs and the early developmental stages.
- Where appropriate and practical, bank vegetation and bed material which has been removed shall be stored to facilitate its replacement when channel works in the vicinity of a watercourse have been completed.
- Works in the vicinity of a watercourse shall be carried out with reference to a water quality protection or surface water management plan for each site which shall ensure that:
  - All necessary measures shall be taken to minimise the generation and release of sediments into all watercourses.
  - Levels of suspended solids in watercourses shall be monitored during the works.
  - Precautions shall be put in place to avoid spillages of diesel, oil or other polluting substances.

Sufficient detail will be included in the pollution control plans to demonstrate that the measures included will adequately address the identified impact pathways and associated risks, and that water quality in receiving water bodies will not be affected to a degree that would adversely affect the integrity of any Natura 2000 site, either alone or in combination with any other plans or projects. Project design will include sufficient pollution control measures to ensure that operational phase run-off does not impact upon water quality in receiving water bodies resulting in adverse effects on the integrity of any Natura 2000 site.

## **Disturbance and Displacement**

### **Birds**

Site clearance involving the cutting or destruction of vegetation and hedgerows shall not take place in the bird breeding season between March 1st and August 31st inclusive.

Mitigation measures to reduce disturbance effects on SCI bird species may include but not be limited to:

- Timing of works (e.g. avoiding works in the vicinity of SPAs with over wintering birds between the months of November and March inclusive)

- Avoid working simultaneously with other projects which could also cause disturbance.
- Screening of works to reduce disturbance impacts.

### **Otter**

Best practice protocols and Standard Operating Procedures (SOPs), including otter SOPs, should be strictly adhered to during any construction works in order to minimise physical disturbance.

In-channel working should be avoided, unless essential.

No in-channel or bankside works to be conducted within 50m of a known or potential otter holt / resting site.

Appropriate surveys to define the disturbance or displacement of these species should be sufficient to definitively inform an assessment as to whether disturbance or displacement effects would adversely affect the Conservation Objectives supporting Favourable Conservation Status of the species, and thus the integrity of the Natura 2000 sites identified. Where necessary, appropriate mitigation measures will be designed and implemented to ensure that elements of the project will not adversely affect the integrity of any Natura 2000 site via this pathway, either alone or in combination with any other plans or programmes.

## **5.4 Mitigation through TII Guidance for Road Schemes**

The TEN-T PRIPD will be assessed in accordance with European and national legislation and developed in accordance with the TII Project Management Guidelines (PMGs) (TII, 2019), and Project Appraisal Guidelines for National Roads, Unit 4.0, (PE-PAG-02013). These guidelines require that the option selection and design of the TEN-T PRIPD is an iterative process between the engineering design team, environmental experts and stakeholders, with the objective to identify an option which would avoid, or minimise likely significant effects on the environment.

The TII Planning and Construction Guidelines also ensure that various environmental issues are integrated into national road scheme planning and delivered during the construction phase of the project. These Guidelines have been developed through consultation with national experts and various relevant stakeholders to ensure that a national approach for the treatment of environmental issues is adopted and that they contribute to the development of national road infrastructure in a sustainable fashion.

In addition there is integration between the discipline guidelines. The landscape guidelines (NRA, 2006) for example promote an '*Ecological Landscape Design*' and synergy between the landscape and ecological disciplines, to minimise the impact biological diversity and severance of commuting corridors and connectivity in the landscape. The guidelines also promote the use of native species in line with national and international policy including the National Biodiversity Plan (2002) and the UN Convention on Biological Diversity (1992) and contributes to Ireland's commitments under the EU Habitats Directive, 92/43/EEC. In addition the TII/NRA construction guidelines for the *Protection and Preservation of Trees, Hedgerows and Scrub Prior to, During and Post Construction of National Road Schemes* (NRA, 2006) include measures to minimise impacts to trees and linear vegetation.

TII/NRA planning and construction guidelines are available for the following environmental aspects:

### **Planning Guidelines**

- **EIA:** *Environmental Impact Assessment of National Road Schemes - A Practical Guide* (NRA, Rev. 1, 2008);
- **Biodiversity, Fauna and Flora:** *Guidelines for Assessment of Ecological Impacts of National Road Schemes* (NRA, Rev. 2 June 2009) and *Ecological Surveying Techniques for Protected*

- Flora and Fauna during the Planning of National Road Schemes* (NRA, 2009); *Best Practice Guidelines for the Conservation of Bats in the Planning of National Road Schemes* (NRA, 2006);
- **Land, Soil and Water:** *Guidelines on Procedures for Assessment and Treatment of Geology, Hydrology and Hydrogeology for National Road Schemes* (NRA, 2008);
  - **Air and Climate:** *Guidelines for the Treatment of Air Quality During the Planning and Construction of National Road Schemes* (National Roads Authority, 2006),
  - **Noise and Vibration:** *Good Practice Guidance for the Treatment of Noise during the Planning of National Road Schemes* (NRA, 2014);
  - **The Built, Natural and Cultural Heritage:** *Guidelines for the Assessment of Archaeological Heritage Impacts of National Road Schemes* (NRA, 2005);
  - **Landscape:** *A Guide to Landscape Treatments for National Road Schemes in Ireland* (NRA, 2006);

#### Construction Guidelines

- **Biodiversity Flora and Fauna:** *Guidelines for the Treatment of Otters prior to the Construction of National Road Schemes* (NRA, 2008); *Guidelines for the Treatment of Badgers prior to the Construction of National Road Schemes* (NRA, 2005); *Guidelines for the Treatment of Bats during the Construction of National Road Schemes* (NRA, 2005); *Guidelines on the Management of Noxious Weeds and Non-Native Invasive Plant Species on National Road Schemes* (NRA, Rev 1. 2010)
- **Water:** *Guidelines for the Crossing of Watercourses during the Construction of National Road Schemes* (NRA, 2008);
- **The Built, Natural and Cultural Heritage:** *Guidelines for the Testing and Mitigation of the Wetland Archaeological Heritage for National Road Schemes* (NRA, 2005);
- **Landscape:** *Guidelines for the Protection and Preservation of Trees, Hedgerows and Scrub Prior to, During and Post Construction of National Road Schemes* (NRA, 2006); *Guidelines on the Implementation of Landscape Treatments on National Road Schemes* (TII, 2012).
- **General Environmental Management:** *Guidelines for the Creation, Implementation and Maintenance of an Environmental Operating Plan* (NRA, 2012); and
- **Waste:** *Management of Waste from National Road Construction Projects* (TII, 2017)

In summary it is considered that there are ample safeguards in place through the avoidance and mitigation strategy detailed above to ensure that adverse effects on the integrity of the Natura 2000 network of sites will not occur.

## 6 Conclusion

### 6.1 Conclusion of Stage II Appraisal for Appropriate Assessment

This NIR documents a Stage II appraisal for Appropriate Assessment of the Proposed Variation to the County Donegal Development Plan 2018-2024 in respect of the TEN-T PRIPD. The NIR has been prepared to inform a Stage II Appropriate Assessment to be undertaken by the competent authority. A review of conservation objectives, qualifying interests and threats to site integrity for relevant European sites was undertaken to identify sites that might be impacted by the proposed amendments comprising the Variation to the CDP.

The Stage I Screening for Appropriate Assessment undertaken by Donegal County Council considered the potential for significant effects of the Proposed Variation on all Natura 2000 sites occurring either partially within the preferred route corridors, or within a 15km zone of influence of said corridors. Of the 15 no. European sites considered at screening stage, it was concluded that 9 no. had no potential for impacts on the conservation objectives of Qualifying Interests / Special Conservation Interests, and these were excluded from further assessment.

A Stage II appraisal of the amendments comprising the Proposed Variation to the CDP 2018-2024, in respect of the TEN-T PRIPD (33 no. textual amendments and 11 no. mapping amendments) on the European sites that were screened in at Stage I was undertaken. A review of conservation objectives, Qualifying Interests / Special Conservation Interests and threats to site integrity for screened in European sites was undertaken in order to identify sites that could be negatively impacted by the amendments comprising the Proposed Variation.

The purpose of the Proposed Variation is to create a spatial and policy framework to facilitate the TEN-T PRIPD so that it can proceed to the statutory approval stage. The project will be subject to an application to ABP and will require AA and EIA. The development of the TEN-T PRIPD will be subject to compliance with the provisions of national and European legislation including in particular the provisions of the EIA Directive (Dir 2011/92/EU as amended by Dir 2014/52/EU), Habitats Directive (Dir 92/43/EEC) and Birds Directive (Dir 2009/147/EC) (or such amendments or replacements of same) as transposed into Irish Law, and the project will be subject to ABP being satisfied that the project complies with European and national legislation. If permission for development is granted, Donegal County Council will be responsible for ensuring compliance with ABP's approval and conditions as well as the requirements of the relevant national and European legislation.

A number of the proposed amendments, through their facilitation of the TEN-PRIPD, were considered to have the potential to result in significant effects on Natura 2000 sites, and it was therefore necessary to mitigate these.

In line with the mitigation hierarchy outlined in Table 5-1, Section 5 of the NIR sets out a detailed avoidance and mitigation strategy to prevent potential adverse effects on the integrity of the Natura 2000 sites concerned including:

- **Avoidance:** Potential impacts will be avoided by locating and designing the development in a manner which avoids adverse effects to the qualifying interests of the Natura 2000 sites.
- **Mitigation at the Project level:** Potential impacts will be mitigated during the detailed design of the project. This will include measures to avoid significant adverse effects on European sites. The project will also have to demonstrate compliance with other relevant national and European legislation, plans, and the Policies and Objectives of the CDP. Potential impacts will also be mitigated through detailed surveys, construction management plans and techniques, pollution control measures, monitoring and post construction reinstatement.

- **Mitigation through TII Guidance for Road Schemes:** Potential impacts will be mitigated through adherence to a range of ecology related TII Planning and Construction Guidelines.

In this regard, as stated in Strategic Objective S-O-11, and Transport Objective T-O-1 of the Proposed Variation, the progression and implementation of the TEN-T PRIPD will be “subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted)”. Project level measures to prevent, reduce and as fully as possible offset any significant adverse effects on the environment will be contained in the Environmental Impact Assessment Report (EIAR) and Natura Impact Statement (NIS) submitted as part of the statutory approvals process. These measures are typically referred to as ‘mitigation’.

Cumulative and in combination effects were also considered in relation to other plans and programmes of relevance and no such potential was identified.

Therefore, considering the Proposed Variation and the specific mitigation measures that require statutory approvals to prevent impact, it was found that no direct, indirect or cumulative significant effects on the Natura 2000 network of sites or its integrity were likely from the Proposed Variation to the CDP.

## 6.2 NIR Conclusion

On the basis of the above assessment it is concluded beyond reasonable scientific doubt that *the Proposed Variation to the County Donegal Development Plan 2018–2024 in respect of the TEN-T PRIPD* will not, either individually or in combination with other plans and projects, adversely affect the integrity of any Natura 2000 site having regard to the mitigation measures outlined in the Report. Any potential impact on the Natura 2000 network shall be mitigated by a detailed avoidance and mitigation strategy including:

- **Avoidance:** Potential impacts will be avoided by locating and designing the development in a manner which avoids adverse effects to the qualifying interests of the Natura 2000 sites.
- **Mitigation at the Project level:** Potential impacts will be mitigated during the detailed design of the project. This will include measures to avoid significant adverse effects on European sites. The project will also have to demonstrate compliance with other relevant national and European legislation, plans, and the Policies and Objectives of the CDP. Potential impacts will also be mitigated through detailed surveys, construction management plans and techniques, pollution control measures, monitoring and post construction reinstatement.
- **Mitigation through TII Guidance for Road Schemes:** Potential impacts will be mitigated through adherence to a range of ecology related TII Planning and Construction Guidelines

In particular the TEN-T PRIPD will be required to undergo AA and, should impacts be identified that may prevent achieving conservation objectives for the features of any given Natura site, mitigation measures will be proposed to ensure that does not happen.

The public will be invited to make submissions on the assessment contained in this Natura Impact Report as part of the public consultation process on the Proposed Variation to the Donegal CDP 2018-2024 in respect of the TEN-T PRIPD.

## 7 References

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## **APPENDIX A**

### **Table of Amendments comprising the Proposed Variation to the Donegal CDP 2018-2024, in respect of the TEN-T PRIPD**

**Table A.1: Amendments comprising the Proposed Variation to the Donegal CDP 2018-2024, in respect of the TEN-T PRIPD**

Ref	Location in Plan	Type of Change	Proposed Variation
1.	Part A Chapter 1 Introduction and Vision Section 1.7 Page 9	Insert new objective	<b>S-O-11</b> To progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD) as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted).
2.	Part A, Chapter 2, Section 2A Core Strategy 2A.7 Page 23	Amend text	The need for investment in new roads access and improvements to existing roads infrastructure within the county is a priority intervention to be sought through the life of the Plan. Map No. 2A.1, the Core Strategy Map, demonstrates the relationship between the strategic transportation framework and the settlement hierarchy and demonstrates the importance of the onward and external connections through, for example, the TEN-T Priority Route Improvement Project, Donegal, the TEN-T Network generally, the A5 Western Transport Corridor and A6 road projects, <del>the TEN-T Network and in particular the Letterkenny Relief Road and the N14 Letterkenny/ Lifford road.</del> These onward and external connections and our focus on achieving the cross border commitments and delivery of these programmes is essential to economic growth. In addition, the benefits of the N4 (Dublin-Sligo) road redevelopment represent a strategic and important piece of infrastructure to County Donegal.
3.	Part A, Chapter 2, Section 2A.10 Core Strategy Objectives Page 26  And  Part A Chapter 2B Section 2B.3	Amend text	<b>CS-O-9:</b> To coordinate and promote the delivery of key roads and access infrastructure (including the A5 Western Transport Corridor and A6 road projects, the TEN-T Priority Route Improvement Project and the TEN-T network generally) <del>the Ten-T Network, Letterkenny Relief Road and the N14 Letterkenny/ Lifford road</del> with the other relevant authorities including partners in the North West Strategic Growth Partnership and within the Northern and Western Regional Assembly so as to result in effective strategic connections to and throughout the County.
4.	Part B Chapter 5 Infrastructure 5.1.1 Background Page 77	Amend text	Donegal’s strategic road network is identified on Map 5.1.2 and in the Core Strategy. It comprises Trans European Transport Network roads (TEN-T), other National roads and a number of regional roads recognised by the Council as being of strategic importance as these roads facilitate high volumes of vehicular traffic, allowing for the efficient movement of traffic between settlements within and outside of the County. <sup>22</sup> <del>Currently the TEN-T Priority Route Improvement Project Donegal is at Constraints Stage / Route Selection. The Route Selection will be completed by Q2/Q3 2018 and upon adoption of the preferred routes, a Material Alteration of the County Development Plan will be required. The new TEN-T Priority Route Improvement Project Donegal Route Corridors will supersede those „historical project reserved corridors“ currently within the County Development Plan as necessary, namely: — N13-N15 Ballybofey Stranorlar Bypass</del>

Ref	Location in Plan	Type of Change	Proposed Variation
5.	Part B Chapter 5 Infrastructure 5.1.1 Background Page 77-78 (Located after text: <i>N14 Letterkenny to Lifford</i> )	Insert new table and amend text	<p style="color: red;"> <del>N56 Letterkenny Relief Road</del>  <del>N14 Letterkenny to Lifford</del> </p> <p>The critical TEN-T network is comprised of the following National Primary Roads (refer Map 5.1.1):</p> <ul style="list-style-type: none"> <li>The N15 road from Bundoran and on to Donegal Town and to Ballybofey/Stranorlar;</li> <li>The N13 Ballybofey/Stranorlar to Letterkenny to Bridgend road (and Derry via the A6); and</li> <li>The N14 Letterkenny to Lifford road (and Strabane via the A5).</li> </ul> <p>These routes provide critical connectivity both:</p> <ul style="list-style-type: none"> <li>To Dublin and the south-east (via the N14 and A5 roads); and to the broader North-West City Region area (with Derry via the N13/A6 route; and with Strabane via the N14/A5 route); and</li> <li>Along much of the length of the County and to the south and the broader Northern and Western Regional Assembly area, and the Atlantic Corridor area (via the N15 and N13 roads).</li> </ul> <p>The N15 Ballybofey/Stranorlar to Lifford road, whilst not on the TEN-T network, is a National Primary Road and provides another vital element of the strategic road network in the east of the County. The N3 Ballyshannon to Belleek road is another National Primary Road which connects the south east of the County to Dublin and the south-east (via the N4) via Enniskillen.</p> <p>The N56 National Secondary road serving the south, west and north-west and north of the County is a second critical element of the County’s National Roads network. As well as providing a vital transport corridor for the residents and businesses of the area, the road also aligns significantly with the Wild Atlantic Way tourism route.</p> <p>Finally, the Council also recognises the vital importance of <del>the under noted</del> the sections of the Regional Road network identified in Map 5.1.2 as part of the Strategic Road network including:</p> <ul style="list-style-type: none"> <li>The R250, R252 and R251 routes connecting the west of the County with the centre and east;</li> <li>The R238, R244, R240, and R241 serving the Inishowen area; and</li> <li>The R245 between Letterkenny and Ramelton Milford and connecting serving the Fanad and Rossgill peninsulas, respectively; and</li> <li>The short, but important, stretch of the R263 linking Killybegs and the N56 National Secondary road; and.</li> </ul> <p style="color: red;"> <del>22 (*In December 2013 the European parliament adopted Regulation (EU) No.315/2013 on Guidelines for the development of the Trans European Transport Network (Ten-T), (amended in 2014 to include supplementary maps (EU) No.473/2014). The Guidelines set out that member states shall “take appropriate measures” to complete their core network by 2030; the maps associated with the Regulations show the core network corridors of the TEN-T extending from Dublin to Belfast, and Dublin to Cork only. Nationally, as a result of the directive, parts of the N13, N14 and N15 have also been</del> </p>

Ref	Location in Plan	Type of Change	Proposed Variation																								
			<p><del>identified as part of the TEN-T network. These routes are identified as strategic and important inter-22</del>                      (*In December 2013 Regulation (EU) No.1315/2013 on Guidelines for the development of the Trans European Transport Network (TEN-T) was adopted. The TEN-T Network includes: roads, railway lines, shipping routes, ports, airports etc. It comprises of 2 network layers namely: 1) The Core Network: the most important connections between large cities and; 2) The Comprehensive Network: other connections throughout European Regions including in Donegal the N13, N14 and most of the N15 national routes. Said regulations identify: enhanced regional accessibility and connectivity, removing bottlenecks particularly in cross border sections, increasing capacity, and improving safety as general priorities for the comprehensive network layer. In December 2016 Regulation (EU) 2017/849 changed the status of the TEN-T Network roads in Donegal from 'Road/Completed' to 'Road/To be upgraded'.</p> <ul style="list-style-type: none"> <li>• <del>The R265</del> The regional road network from Carrigans to Rossgier.</li> </ul> <p><del>Table 5.1 below details a number of proposed transportation improvement projects across the county that are identified on maps, and that are in addition to the continued upgrade and maintenance of the local county road network.</del></p> <p>Table 5.1A below provides an overview of all the components of the Strategic Road Network:</p> <p><b>TABLE 5.1A – Strategic Road Network (as shown on Map 5.1.2)</b></p> <table border="1"> <thead> <tr> <th colspan="2">Strategic Road Network</th> </tr> </thead> <tbody> <tr> <td>N13 Ballybofey/Stranorlar to Letterkenny to Bridgend road</td> <td>TEN-T Network / National Primary</td> </tr> <tr> <td>N14 Letterkenny to Lifford road</td> <td>TEN-T Network / National Primary</td> </tr> <tr> <td>N15 Bundoran to Ballybofey/Stranorlar</td> <td>TEN-T Network / National Primary</td> </tr> <tr> <td>N3 Ballyshannon to Belleek</td> <td>National Primary</td> </tr> <tr> <td>N15 Ballybofey/Stranorlar to Lifford road</td> <td>National Primary</td> </tr> <tr> <td>N56 Serving the south, west and north-west and north of the County</td> <td>National Secondary</td> </tr> <tr> <td>R250, R251 and R252 – connecting the west of the County with the centre and east</td> <td>Regional</td> </tr> <tr> <td>R238, R240, R241 and R244 - serving the Inishowen area</td> <td>Regional</td> </tr> <tr> <td>R245 – Letterkenny and Ramelton and connecting the Fanad and Rossgill peninsulas</td> <td>Regional</td> </tr> <tr> <td>R263 – section connecting Killybegs and the N56</td> <td>Regional</td> </tr> <tr> <td>R265 - Carrigans to Rossgier</td> <td>Regional</td> </tr> </tbody> </table>	Strategic Road Network		N13 Ballybofey/Stranorlar to Letterkenny to Bridgend road	TEN-T Network / National Primary	N14 Letterkenny to Lifford road	TEN-T Network / National Primary	N15 Bundoran to Ballybofey/Stranorlar	TEN-T Network / National Primary	N3 Ballyshannon to Belleek	National Primary	N15 Ballybofey/Stranorlar to Lifford road	National Primary	N56 Serving the south, west and north-west and north of the County	National Secondary	R250, R251 and R252 – connecting the west of the County with the centre and east	Regional	R238, R240, R241 and R244 - serving the Inishowen area	Regional	R245 – Letterkenny and Ramelton and connecting the Fanad and Rossgill peninsulas	Regional	R263 – section connecting Killybegs and the N56	Regional	R265 - Carrigans to Rossgier	Regional
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6.	Part B Chapter 5 Infrastructure 5.1.1 Background Page 77-78	Insert text	<p><b>Proposed Transport Improvement Projects</b></p> <p>Table 5.1B below details a number of proposed transportation improvement projects across the county that are identified on maps, and that are in addition to the continued upgrade and maintenance of the local county road network.</p> <p>This includes the TEN-T Priority Route Improvement Project, Donegal which consists of and prioritises 3 key sections of the TEN-T network in Donegal for improvement namely:</p>																								

Ref	Location in Plan	Type of Change	Proposed Variation
			<ul style="list-style-type: none"> <li>• Section 1 – N15/N13 Ballybofey/Stranorlar Urban Region.</li> <li>• Section 2 – N56/N13 Letterkenny to Manor Cunningham.</li> <li>• Section 3 – N14 Manor Cunningham to Lifford/Strabane /A5 Link.</li> </ul> <p>The preferred route corridors for those sections are now show on Map 5.1.5, Map 5.1.6 and Map 5.1.4, respectively.</p> <p>These preferred route corridors replace the historic reserved route corridors (the N13-N15 Ballybofey Stranorlar Bypass, the N56 Letterkenny Relief Road, and the N14 Letterkenny to Lifford) previously detailed in this plan.</p> <p>The benefits of the TEN-T Priority Route Improvement Project, Donegal are significant and wide ranging including:</p> <ul style="list-style-type: none"> <li>• <b>Economic:</b> Facilitating economic growth and allowing Donegal to successfully compete for inward investment by improving the efficiency and capacity of the road network including improving journey time and journey time reliability at a local, regional and national level.</li> <li>• <b>Safety:</b> Reducing the frequency and severity of collisions/improving safety on our national roads and enhancing road safety in towns, villages and rural areas by segregating strategic traffic from local traffic.</li> <li>• <b>Environmental:</b> Reducing air pollution caused by congestive queuing and reducing noise levels near noise sensitive receptors.</li> <li>• <b>Quality of life:</b> Reducing journey times, reducing traffic and thus freeing up road space in our towns and villages for sustainable transport modes (i.e. walking, cycling and public transport), providing new walking and cycling infrastructure as part of the scheme and improving access to health and education services.</li> <li>• <b>Enhancing Regional Accessibility:</b> Improving accessibility to/from Donegal for employers, exporters, tourists and the general public.</li> <li>• <b>Strategic/Cross border:</b> Improving cross border connectivity, unlocking the potential of the North West City Region and the Atlantic Economic Corridor.</li> </ul> <p>Furthermore the strategic importance of said project to the County is highlighted by the fact that:</p> <ul style="list-style-type: none"> <li>• Enhanced Regional accessibility, including upgrading access to the North West utilising routes such as the N14 and progressive development of the Atlantic Economic Corridor Northwards by upgrading the N15/N13 link, is a National Strategic Outcome of the National Planning Framework Project Ireland 2040.</li> <li>• The “N15 Ballybofey Bypass”, “N13/N14/N56 Letterkenny Bypass and Dual Carriageway to Manor Cunningham” and the “N14 Manor Cunningham to Lifford” are all listed as priorities for investment within the National Development Plan 2018-2027.</li> <li>• It is an objective of the Regional Spatial and Economic Strategy for the Northern and Western</li> </ul>

Ref	Location in Plan	Type of Change	Proposed Variation
			<p>Regional Assembly Area to deliver the project by 2028. (Objective RPO 3.7.30 of said document refers).</p> <ul style="list-style-type: none"> <li>The project is fundamental to both the success of the North West City Region and enhanced transport connectivity between Ireland and Northern Ireland, each of which in turn are National Policy Objectives of the National Planning Framework (NPO 45 and 46 of said document refers).</li> </ul> <p>The TEN-T Priority Route Improvement Project, Donegal includes: The mainline and all associated temporary and permanent works including, but not restricted to, all junctions, associated link and other new roads, realignment of existing roads necessitated by the Project along with all earthworks, structures and bridges, drainage, signage, construction compounds, borrow pits and deposition areas related to said project.</p>
7.	Part B Chapter 5 Infrastructure 5.1.1 Background Page 78	Insert new table	<p><b>TABLE 5.1B: Proposed Transportation Improvement Projects Identified on Maps Listed Below.</b></p>
8.	Part B Chapter 5, 5.1.2 Objectives Page 77 And Part A Chapter 2B 2B.3 Restatement of Narrative, Objectives and Policies of Direct Relevance to the Border Dimension	Amend objective	<p><b>T-O-1:</b> To deliver improvements to the Trans European Transport Network (TEN-T), (as required by EU Regulation (EU) No.1315/2013 "Guidelines for the development of the Trans European Transport Network (TEN-T)") as part of the core and comprehensive transport network of Ireland."</p> <p>In this regard it is a specific objective of the Council to:</p> <p>a) Progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted).</p> <p>b) Reserve the preferred route corridors of the TEN-T Priority Route Improvement Project, Donegal as shown on maps 5.1.4, 5.1.5, and 5.1.6 for the purposes of the project and the ancillary facilities to service the same and not to permit other development within those corridors where such development may prejudice the carrying out/implementation of the said project.</p>
9.	Part B Chapter 5, 5.1.2 Objectives Page 77	Insert new objective	<p><b>T-O-1A:</b></p> <p>Should there be any ostensible or apparent conflict between, on the one hand, the Objectives, Policies and/or provisions of the development plan herein providing for the development of the TEN-T Priority Route Improvement Project, Donegal (TEN-T PRIPD) and, on the other hand, any other Objectives, Policies and/or provisions of the development plan, those Objectives, Policies and Provisions which provide for the development of the TEN-T PRIPD shall take priority over all or any other provisions of the development plan and any such other provisions or Objectives shall be read and construed as</p>

Ref	Location in Plan	Type of Change	Proposed Variation
			subservient to and not in any material way contravening so much of the Objectives, Policies and provisions contained within this development plan as provide for the development of the TEN-T PRIPD.
10.	Part B Chapter 5 Infrastructure 5.1.2 Objectives Page 79	Amend objective	<b>T-O-7:</b> To protect the corridors and routes and acquire the lands necessary for transportation improvement projects as identified in Table 5.1B above.
11.	Part B Chapter 5 Infrastructure 5.1.2 Policies Page 79	Amend policy	<p><b>T-P-1:</b> It is a policy of the Council to support and facilitate the appropriate development, extension and improvement of the TEN-T network (Map 5.1.1 refers) within Donegal in accordance with the Core Strategy and subject to environmental, safety and other planning considerations. In this regard it is a specific policy of the Council to:</p> <p>a) Progress and ultimately carry out/implement the TEN-T Priority Route Improvement Project, Donegal as one of critical strategic importance to Donegal subject to the granting of the required statutory approvals for same and the terms and conditions of any such approvals (if granted).</p> <p>b) Reserve the preferred route corridors of the TEN-T Priority Route Improvement Project, Donegal as shown on maps 5.1.4, 5.1.5, and 5.1.6 for the purposes of the project and the ancillary facilities to service the same and not to permit other development within those corridors where such development may prejudice the carrying out/implementation of the said project.</p> <p>c) Facilitate any development related to the TEN-T Priority Route Improvement Project, Donegal within lands zoned:</p> <ul style="list-style-type: none"> <li>o TEN-T PRIPD/Established Development.</li> <li>o TEN-T PRIPD/Strategic Residential Reserve.</li> <li>o TEN-T PRIPD/General Employment.</li> <li>o TEN-T PRIPD/Open Space.</li> <li>o TEN-T PRIPD/Amenity.</li> </ul>
12.	Part B Chapter 5 Infrastructure 5.1.3 Policies Page 82	Amend policy	<b>T-P-24:</b> Save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal it is a policy of the Council to protect established/historic railway corridors throughout the County primarily for strategic infrastructure provision (such as rail/road/greenway projects) and secondly for recreational development. Along these corridors other uses shall not be considered. Where these corridors have already been compromised by development, adjacent lands which could provide opportunities to bypass such an impediment and reconnect these routes for amenity purposes (walking/cycling) shall be protected for this purpose. However, in all instances, the over-riding objective shall be the provision of strategic infrastructure.
13.	Part B Chapter 7	Amend policy	<b>NH-P-10:</b> Save to the extent necessary to allow for the provision of the TEN-T Priority Route

Ref	Location in Plan	Type of Change	Proposed Variation
	The Natural and Built Heritage 7.1.3 Policies Page 132		<b>Improvement Project, Donegal</b> It is a policy of the Council to retain and protect significant stands of existing trees/hedgerows/woodlands, and seek increased planting of native trees where appropriate in new developments.
14.	Part B Chapter 7 The Natural and Built Heritage 7.2.3 Policies Page 136	Amend policy	<b>BH-P-3:</b> It is a policy of the Council to ensure retention of vernacular and/or historic structures (and parts of structures) <b>not included on the Record of Protected Structures</b> , including their functional and decorative details, that are sensitive to traditional construction methods and materials and do not have a detrimental impact on the character or appearance of a structure and are in accordance with current conservation guidelines and best practice- <b>save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.</b>
15.	Part B Chapter 7 The Natural and Built Heritage 7.2.3 Policies Page 136	Amend policy	<b>BH-P-4:</b> It is a policy of the Council to ensure the repair, reuse and appropriate refurbishment of vernacular and/or historic buildings <b>not included on the Record of Protected Structures</b> , which make a positive contribution to the built heritage of the area including those as referred to on the National Inventory of Architectural Heritage- <b>save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.</b>
16.	Part B Chapter 7 The Natural and Built Heritage 7.2.3 Policies Page 136	Amend policy	<b>BH-P-5:</b> It is a policy of the Council to protect and preserve vernacular and/or historic industrial and maritime buildings <b>not included on the Record of Protected Structures</b> . Proposals for restoration or adaptive re-use should be facilitated subject to a full architectural assessment- <b>save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.</b>
17.	Part B Chapter 7 The Natural and Built Heritage 7.3.3 Policies Page 138	Amend policy	<b>AH-P-1:</b> <del>It is a policy of the Council to protect and enhance the integrity of Archaeological Monuments and their settings and to secure the preservation in situ of all archaeological monuments included on the Record of Monuments and Places. Preservation by record shall only be considered in exceptional circumstances where the principles of the Department of Arts, Heritage, Gaeltacht and the Islands publication entitled; 'Framework and Principles for the Protection of Archaeological Heritage' can be satisfied.</del> It is a policy of the Council to: a) Protect and enhance the integrity of Archaeological Monuments and to secure the preservation in situ of all archaeological monuments included on the Record of Monuments and Places. Preservation by



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			<p>record shall only be considered in exceptional circumstances where the principles of the Department of Arts, Heritage, Gaeltacht and the Islands publication entitled; 'Framework and Principles for the Protection of Archaeological Heritage' can be satisfied.</p> <p>b) Protect the settings of such archaeological monuments save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.</p>
18.	<p>Part B Chapter 7 The Natural and Built Heritage 7.3.3 Policies Page 139</p>	Amend policy	<p><b>AH-P-3:</b> <del>It is the policy of the Council to protect the character, settings of and views from National Monuments and Recorded Monuments and to manage development which would be considered to (visually or physically) intrude upon or inhibit the enjoyment of the amenities of these sites.</del></p> <p>It is a policy of the Council to:</p> <p>a) Protect the character of National Monuments and Recorded Monuments and to manage development which would be considered to (physically) intrude upon or inhibit the enjoyment of the amenities of these sites.</p> <p>b) Protect the settings of and views from such archaeological monuments save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.</p>
19.	<p>Part B Chapter 7 The Natural and Built Heritage 7.3.3 Policies Page 139</p>	Amend policy	<p><b>AH-P-4:</b> <del>It is the policy of the Council to protect where appropriate, the character and setting of any unrecorded archaeological object or site.</del></p> <p>It is a policy of the Council to:</p> <p>a) Protect where appropriate, the character of any unrecorded archaeological object or site.</p> <p>b) Protect the settings of such archaeological objects or sites save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.</p>
20.	<p>Part B Chapter 7 The Natural and Built Heritage 7.3.3 Policies Page 139</p>	Amend policy	<p><b>AH-P-5:</b> <del>It is the policy of the Council to protect and preserve archaeological sites, their characters and settings which have been identified subsequent to the publication of the Record of Monument and Places.</del></p> <p>It is a policy of the Council to:</p> <p>a) Protect and preserve archaeological sites and their characters which have been identified subsequent to the publication of the Record of Monument and Places.</p> <p>b) Protect the settings of such archaeological sites save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.</p>
21.	<p>Part B Chapter 9 Tourism 9.2</p>	Amend objective	<p><b>TOU-O-11:</b> To protect and enhance the built and historical heritage of the county (including structures on the RPS, NIAH, recorded monuments, heritage towns and battlefield sites) as an important element of the</p>

Ref	Location in Plan	Type of Change	Proposed Variation				
	Objectives Page 157		County's overall tourism product in accordance with, and to the extent provided for, in the built heritage policies and objectives of this plan.				
22.	Part B Chapter 10 The Marine Resource and Coastal Management 10.3 Policies Page 168	Amend policy	<b>MRCM-P-7:</b> It is a policy of the Council not to permit developments at locations at risk from coastal flooding in accordance with the flooding policies of this Plan: save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.				
23.	Part C Chapter 12 Letterkenny Table 12.2 Zoning Objectives in relation to Letterkenny Page 5	Insert New Zoning Objective as new row in table.	<table border="1"> <thead> <tr> <th>Zone</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>TEN-T PRIPD/Established Development</td> <td>To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal subject to all relevant material planning considerations, all the policies of this Plan, relevant National/ regional policy/guidance including environmental designations and subject to the proper planning and sustainable development of the area</td> </tr> </tbody> </table>	Zone	Objective	TEN-T PRIPD/Established Development	To conserve and enhance the quality and character of the area, to protect residential amenity and allow for development appropriate to the sustainable growth of the settlement and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal subject to all relevant material planning considerations, all the policies of this Plan, relevant National/ regional policy/guidance including environmental designations and subject to the proper planning and sustainable development of the area
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24.	Part C Chapter 12 Letterkenny Table 12.2 Zoning Objectives in relation to Letterkenny Page 5	Insert New Zoning Objective as new row in table.	<table border="1"> <thead> <tr> <th>Zone</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>TEN-T PRIPD/Strategic Residential Reserve</td> <td>To reserve land for residential development as a long term strategic landbank and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.</td> </tr> </tbody> </table>	Zone	Objective	TEN-T PRIPD/Strategic Residential Reserve	To reserve land for residential development as a long term strategic landbank and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
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27.	Part C Chapter 12 12.4.1.2 Page 32	Amend policy	<b>LK-T-P-4: Rail Corridor</b> It is the policy of the Council to ensure that the historic 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-instatement within the national rail network- <a href="#">save to the extent necessary to allow for the provision of the TEN-T Priority Route Improvement Project, Donegal.</a>				
28.	Part C Chapter 15 Settlement Frameworks Table 15.2 Land Use Zoning Objectives related to Settlement Framework Maps Page 95	Insert New Zoning Objective as last row of table	<table border="1"> <thead> <tr> <th>LAND USE ZONE</th> <th>OBJECTIVE</th> </tr> </thead> <tbody> <tr> <td>TEN-T PRIPD/Amenity</td> <td>To reserve and enhance land for formal and informal amenity and open space purposes, to make provision for new recreation, leisure and community facilities and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.</td> </tr> </tbody> </table>	LAND USE ZONE	OBJECTIVE	TEN-T PRIPD/Amenity	To reserve and enhance land for formal and informal amenity and open space purposes, to make provision for new recreation, leisure and community facilities and to provide for the development of the TEN-T Priority Route Improvement Project, Donegal.
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Mapping Amendments							
1.			Remove existing Map 2.1 Core Strategy Schematic and replace with new Map 2A.1 Core Strategy Schematic.				
2.			Remove existing Map 5.1.1 Ten T Network and replace with new Map 5.1.1 TEN-T Network.				
3.			Remove existing Map 5.1.2 Strategic Transport Network and replace with new Map 5.1.2 Strategic Transport Network				
4.			Remove existing Map 5.1.4 Letterkenny to Lifford and replace with new Map 5.1.4 TEN-T Priority Route Improvement Project Section 3 N14 Manorcunningham to Lifford/Strabane/A5 Link.				
5.			Remove existing Map 5.1.5 N13-N15 Ballybofey Stranorlar Bypass and replace with new Map 5.1.5 TEN-T Priority Route Improvement Project, Donegal Section 1 - N15/N13 Ballybofey/Stranorlar Urban Region.				
6.			Remove existing Map 5.1.6 N56 Letterkenny Relief Road and replace with new Map 5.1.6 TEN-T Priority Route Improvement Project, Donegal Section 2 - N56/N13 Letterkenny to Manorcunningham.				
7.			Remove existing Map 7.1.1 Scenic Amenity and replace with new Map 7.1.1 Scenic Amenity.				
8.			Remove existing Map 12.1 B Letterkenny Land Use Zoning Map and replace with new Map 12.1 B Letterkenny Land Use Zoning Map				
9			Remove existing Map 12.3 Letterkenny Transport Map and replace with new Map 12.3 Letterkenny Transport Map.				

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10.			Remove existing Map 15.2 Ballybofey-Stranorlar and replace with new Map 15.2 Ballybofey-Stranorlar
11.			Remove existing Map 15.17 Lifford and replace with new Map 15.17 Lifford

# **APPENDIX B**

## **Consultee Responses**



Natural Environment Division  
Klondyke Building  
Cromac Avenue  
Gasworks Business Park  
Malone Lower  
BELFAST  
BT7 2JA

County house  
Lifford  
County Donegal  
Ireland  
F93 Y622

4th November 2020

**Re: County Donegal Development Plan 2018-2024 (Variation No. 1) in respect of the TEN-T Priority Route Improvement Project, Donegal.**

Dear Mr Christy,

DAERA would like to add additional comments from our Marine Team to those which were submitted on 2<sup>nd</sup> November 2020.

**Marine Plan Response:**

**These comments relate to the SEA Screening Report only**

Thank you for the opportunity to make observations with respect to the above variation.

We agree with your recommendation that an Environmental Report is required, as the proposed variation has the potential to give rise to transboundary effects. It is observed there may be scope to explicitly draw out potential transboundary effects on the Northern Ireland marine environment, as advised in our responses on (1) the Advanced Scoping exercise and (2) the previous Screening Report earlier this year.

Potential for transboundary marine effects exist as route corridors to Section 1 and Section 3 lie upstream of the River Foyle which directly connects to the Northern Ireland marine environment. As a result, there could be potential for effects on for example marine biodiversity; marine Natura 2000 sites; and marine, coastal and transitional waters within the Northern Ireland marine environment. It is suggested that consideration be given to including clear reference to these potential transboundary marine effects within the anticipated Environmental Report.

It is also observed that no reference is made to the Marine Strategy Framework Directive or the Maritime Spatial Planning Directive with regard to the implementation of EU legislation on the environment within Table 2.1.

**Inland Fisheries Response;**

Inland Fisheries have considered the Variation Documents provided by Donegal County Council and based on the information provided are content there are no



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significant impacts to trans jurisdictional watercourses within our remit. We would point out that in the main the catchments affected are within the Loughs Agency jurisdiction and as such the proposer should ensure said agency is consulted in reference to these documents. As a statutory consultee Inland Fisheries will continue to provide advice on any potential impacts on fisheries interests in relation to these proposals via the planning process and will assess any potential impacts of these proposals when the detailed applications are submitted.

Yours sincerely

pp 

Ms Donna Whelan  
Senior Scientific Officer  
NIEA, DAERA



An Agency within the Department of  
**Agriculture, Environment  
and Rural Affairs**  
[www.daera-ni.gov.uk](http://www.daera-ni.gov.uk)



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Gasworks Business Park  
Malone Lower  
BELFAST  
BT7 2JA

County house  
Lifford  
County Donegal  
Ireland  
F93 Y622

2nd November 2020

**Re: County Donegal Development Plan 2018-2024 (Variation No. 1) in respect of the TEN-T Priority Route Improvement Project, Donegal.**

Dear Mr Christy,

DAERA refer to our previous response of 10th August 2020, in relation to a proposed variation to the plan in respect of the TEN T route. While it is unlikely that there would be direct physical adverse effects of this programme on Northern Ireland's natural and historic environment. Many natural and historical features will have transboundary qualities and relationships which add to their understanding.

Information about and the location of protected sites within Northern Ireland can be found on the DAERA website and the DAERA NIEA Map Viewer following the links below:

[www.daera-ni.gov.uk/landing-pages/protected-areas](http://www.daera-ni.gov.uk/landing-pages/protected-areas)

[www.daera-ni.gov.uk/services/natural-environment-map-viewer](http://www.daera-ni.gov.uk/services/natural-environment-map-viewer)

Our natural environment datasets are available at the link below:

[www.daera-ni.gov.uk/articles/download-digital-datasets](http://www.daera-ni.gov.uk/articles/download-digital-datasets)

Our historic environment datasets are available at the link below and may aid spatial understanding of the historic landscape context to inform the assessment.

[www.communities-ni.gov.uk/publications/historic-environment-digital-datasets](http://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets)

Yours sincerely

pp 

Ms Donna Whelan  
Senior Scientific Officer  
NIEA, DAERA



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and Rural Affairs**  
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Natural Environment Division  
Klondyke Building  
Cromac Avenue  
Gasworks Business Park  
Malone Lower  
BELFAST  
BT7 2JA

County house  
Lifford  
County Donegal  
Ireland  
F93 Y622

10th August 2020

**Re: County Donegal Development Plan 2018-2024 (Variation No. 1) in respect of the TEN-T Priority Route Improvement Project, Donegal.**

Dear Mr Christy,

DAERA welcome the opportunity to comment on the Strategic Environmental Assessment (SEA) Screening Report and Appropriate Assessment (AA) Screening Report.

DAERA has considered the consultation document and our opinions are set out below.

#### **DAERA Considerations**

##### **Natural Environment Division Response**

Several Natura 2000 sites within Northern Ireland are located close to the preferred route corridors, with potential for transboundary effects on the natural environment.

It is suggested that consideration be given to including clear reference to these potential transboundary natural environment effects within the anticipated Environmental Reports.

Information about and the location of protected sites within Northern Ireland can be found on the DAERA website and the DAERA NIEA Map Viewer following the links below:

[www.daera-ni.gov.uk/landing-pages/protected-areas](http://www.daera-ni.gov.uk/landing-pages/protected-areas)

[www.daera-ni.gov.uk/services/natural-environment-map-viewer](http://www.daera-ni.gov.uk/services/natural-environment-map-viewer)



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### Marine and Fisheries Division Response

We agree with your recommendation that an Environmental Report is required. It is observed there may be scope to explicitly draw out potential transboundary effects on the Northern Ireland marine environment, as advised in our response to the Advanced Scoping exercise in May 2020.

Potential for transboundary marine effects exist as route corridors to Section 1 and Section 3 lie upstream of the River Foyle which directly connects to the Northern Ireland marine environment. As a result, there could be potential for effects on for example marine biodiversity; marine Natura 2000 sites; and marine, coastal and transitional waters within the Northern Ireland marine environment.

It is suggested that consideration be given to including clear reference to these potential transboundary marine effects within the anticipated Environmental Report.

It is also observed that no reference is made to the Marine Strategy Framework Directive or the Maritime Spatial Planning Directive within regard to the implementation of EU legislation on the environment within Table 2.1.

Monitoring and Assessment Team response to planning consultation refers to standing Northern Ireland advice:

<https://www.daera-ni.gov.uk/publications/standing-advice-development-may-have-effect-water-environment-including-groundwater-and-fisheries>

There may be similar or alternative guidelines in Rep of Ireland which should be followed.

### DfC Historic Environment Division (HED)

DfC Historic Environment Division (HED) operate via a Service Level Agreement with colleagues in DAERA in relation to SEA, whereby we provide authoritative comment and advice in relation to matters of Cultural Heritage including archaeological and architectural heritage.

HED refer to our previous comments at advanced scoping stage. We consider that direct impacts of the plan to heritage assets located in Northern Ireland are highly unlikely. Nonetheless we highlight that our historic environment datasets available at the link below may add value in the assessment of potential cultural heritage impacts with regard to the Manorcunningham –Lifford/Strabane route.

These offer a spatial demonstration of cultural heritage trends in the locality, some of which may be reflected on a transboundary level, which will aid in



understanding context and characterization of the historic landscape, and where potential impacts on landscape setting for heritage assets may occur.

<https://www.communities-ni.gov.uk/publications/historic-environment-digital-datasets>

Yours sincerely

pp 

Ms Donna Whelan  
Senior Scientific Officer  
NIEA, DAERA



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**Agriculture, Environment  
and Rural Affairs**  
www.daera-ni.gov.uk



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**From:** Environmental Co-ordination (Inbox) [[mailto:Environmental\\_Co-ordination@agriculture.gov.ie](mailto:Environmental_Co-ordination@agriculture.gov.ie)]  
**Sent:** 04 November 2020 08:54  
**To:** MAEVE MC ELROY  
**Subject:** RE: Proposed Variation to the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Improvement Project, Donegal (Variation No. 1)

CAUTION: This email originated from outside of Donegal County Council. Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

Hello Maeve

Please find below observations from this Department in relation to the proposed variation to the Donegal CDP

The proposed variations to the County Development Plan and associated proposals in relation to the proposed TEN-T Priority Route Improvement Projects while generally remote from the Marine area, the council should be advised; *in the proposed Appropriate Assessment and Environmental Report to take particular cognisance of the potential impacts on the fisheries and aquaculture interests in Lough Swilly. This is particularly relevant to the preferred route corridor for Section 2 (N56/N13 Letterkenny to Manor Cunningham) which impacts directly on the marine environment.*

Regards

**Cathy Hewitt**

*Executive Officer*

**An tAonad um Chomhordáil Timpeallachta, An Rannóg um Athrú Aeráide agus Beartas Bithhuinnimh,**

*Environmental Co-ordination Unit | Climate Change & Bioenergy Policy Division |*

**An Roinn Talmhaíochta, Bia agus Mara**

*Department of Agriculture, Food and the Marine*

**Pailiáin A, Páirc Gnáth Grattan, Báthar Átha Cliath, Port Laoise, Co Laoise, R32 K857**

*Pavilion A, Grattan Business Park, Dublin Road, Portlaoise, Co Laois, R32 K857*

*T +353 (0)57 868 9915 [environmentalco-ordination@agriculture.gov.ie](mailto:environmentalco-ordination@agriculture.gov.ie)*

*[www.agriculture.gov.ie](http://www.agriculture.gov.ie)*





Roinn Cumarsáide, Gníomhaithe  
ar son na hAeráide & Comhshaoil  
Department of Communications,  
Climate Action & Environment



**Geological Survey**  
Suirbhéireacht Gheolaíochta  
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Emily Kelly-Leahy  
RPS  
Lyrr 2  
IDA Business & Technology Park  
Mervue  
Galway  
Ireland

15 May 2020

**Re: 20\_90\_ Consultation Request - TEN-T Priority Route Improvement Project, Donegal.**

**Your Ref: MGT0337LT0010.**

**Our Ref: 20/90**

Geological Survey Ireland is the national earth science agency and has datasets on Bedrock Geology, Quaternary Geology, Geological Heritage Sites, Mineral deposits, Groundwater Resources and the Irish Seabed. These comprise maps, reports and extensive databases that include mineral occurrences, bedrock/mineral exploration groundwater/site investigation boreholes, karst features, wells and springs. Please see our [website](#) for data availability and we recommend using these various data sets, when undergoing the, planning and scoping processes. Geological Survey Ireland should be referenced to as such and should any data or geological maps be used, they should be attributed correctly to Geological Survey Ireland.

A chara,

With reference to your correspondence of 30 April 2020, concerning the TEN-T Priority Route Improvement Project, Donegal, Geological Survey Ireland would like to note that we have responded separately and similarly to a request for comments from Donegal County Council Central Planning Unit, in relation to a variation to their county development plan in respect of the same project (Donegal Co.Co. ref: CDP/243 (TEN-T Variation / GSI ref: 20/89). In respect of this consultation request by RPS, Geological Survey Ireland would like to make the following comments:

#### **Geoheritage**

Geological Survey Ireland (GSI) is in partnership with the National Parks and Wildlife Service (NPWS, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs) to identify and select important geological and geomorphological sites throughout the country for designation as geological NHAs (Natural Heritage Areas). This is addressed by the Irish Geoheritage Programme (IGH) of GSI, under 16 different geological themes, in which the minimum number of scientifically significant sites that best represent the theme are rigorously selected by a panel of theme experts.

County Geological Sites (CGS), as adopted under the National Heritage Plan are now included in County Development Plans and in the GIS of planning departments, to ensure the recognition and appropriate protection of geological heritage within the planning system. Unaudited CGS's (sites identified from published data and available knowledge) in County Donegal identified prior to completion of an audit can be viewed online under the Geological Heritage tab on the online [Map Viewer](#). The CGS audit for Co. Donegal was completed in 2019 and while it is not yet published **our records show that there are no audited CGSs in the vicinity of the proposed road improvement study areas.**

Therefore, with the current plan, there are no envisaged impacts on the integrity of current unaudited CGSs by the proposed development. However, as there are sites within the wider surrounds of the study area and as the county audit is currently in progress, if the proposed development plan is altered, please contact Clare Glanville (Clare.Glanville@gsi.ie) for further information and possible mitigation measures if applicable.

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Geological Survey Ireland, Beggars Bush, Haddington Road, Dublin D04 K7X4, Ireland.

Suirbhéireacht Gheolaíochta Éireann, Tor an Bhacaigh, Bóthar Haddington, Baile Átha Claithe D04 K7X4, Éire.

T +353 (0)1 678 2000 **LoCall** / LóGhlao 1890 44 99 00 [www.gsi.ie](http://www.gsi.ie) Fáiltítear roimh comhfhreagras i nGaeilge



Roinn Cumarsáide, Gníomhaithe  
ar son na hAeráide & Comhshaoil  
Department of Communications,  
Climate Action & Environment



**Geological Survey**  
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Should any significant bedrock cuttings be created during the construction works, we would ask that they will be designed to remain visible as rock exposure rather than covered with soil and vegetated, in accordance with safety guidelines and engineering constraints. In areas where natural exposures are few, or deeply weathered, this measure would permit on-going improvement of geological knowledge of the subsurface and could be included as additional sites of the geoheritage dataset, if appropriate. Alternatively, we ask that a digital photographic record of significant new excavations could be provided. Potential visits from Geological Survey Ireland to personally document exposures could also be arranged.

### **Natural Resources (Minerals/Aggregates)**

Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required. Geological Survey Ireland highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process. Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our [Minerals section](#) of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our [Map Viewer](#). Our Aggregates Potential Map records crushed rock aggregate potential ranging from 'high potential' to 'very high potential' and granular aggregate potential of 'moderate potential' in the wider vicinity of the project **and consideration to aggregate potential sterilisation should be included as part of the planning process**. The Active Quarries database shows one active and one old quarry in close proximity to the study area.

### **Geohazards**

Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides are the most prevalent of these hazards. Geological Survey Ireland has information available on past landslides for viewing as a layer on our [Map Viewer](#). Geological Survey Ireland also engages in national projects such as Landslide Susceptibility Mapping and GWFlood Groundwater Flooding. **The landslide susceptibility mapping for County Donegal shows that the study area is generally classified as low susceptibility but there are discrete areas mapped as moderate and high susceptibility** and we advise the use of our data sets in considering the impact of geohazards and land slides. We recommend that geohazards be taken into consideration, especially when developing areas where these risks and susceptibility are prevalent, and we encourage the use of our data when doing so. **Our data shows no recorded landslides in the study area.**

### **Groundwater**

Groundwater is important as a source of drinking water, and it supports river flows, lake levels and ecosystems. It contains natural substances dissolved from the soils and rocks that it flows through, and can also be contaminated by human actions on the land surface. As a clean, but vulnerable, resource, groundwater needs to be understood, managed and protected. Through our [Groundwater Programme](#), Geological Survey Ireland provides advice and maps to members of the public, consultancies and public bodies about groundwater quality, quantity and distribution.

Geological Survey Ireland monitors groundwater nationwide by characterising aquifers, investigating karst landscapes and landforms and by helping to protect public and group scheme water supplies. With regard to Flood Risk Management, there is a need to identify areas for integrated constructed wetlands. We recommend using the GSI's National Aquifer and Recharge maps on our [Map viewer](#) to this end. **Our records show multiple wells and springs within the study area and at least one public water supply source protection area.**

### **Geotechnical Database Resources**

Geological Survey Ireland continues to populate and develop our national geotechnical database and viewer with site investigation data submitted voluntarily by industry. The current database holding is over 7500 reports with 134,000 boreholes; 31,000 of which are digitised which can be accessed through downloads from our [Geotechnical Map Viewer](#). We would strongly recommend that this database be consulted as part of any baseline geological assessment of the proposed development as it can provide invaluable baseline data for the region or vicinity of the proposed development area. This information may be beneficial and cost saving for any site specific investigations that may be designed as part of the development.

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Geological Survey Ireland, Beggars Bush, Haddington Road, Dublin D04 K7X4, Ireland.

Suirbhéireacht Gheolaíochta Éireann, Tor an Bhacaigh, Bóthar Haddington, Baile Átha Claithe D04 K7X4, Éire.

T +353 (0)1 678 2000 **LoCall** / LóGhlao 1890 44 99 00 [www.gsi.ie](http://www.gsi.ie) Fáiltítear roimh comhfhreagrú i nGaeilge



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ar son na hAeráide & Comhshaoil  
Department of Communications,  
Climate Action & Environment



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Geological Survey Ireland would much appreciate a copy of reports detailing any site investigations carried out. The data would be added to GSI's national database of site investigation boreholes, implemented to provide a better service to the civil engineering sector. Data can be sent to Beatriz Mozo, Geological Mapping Unit, at [Beatriz.Mozo@gsi.ie](mailto:Beatriz.Mozo@gsi.ie), 01-678 2795.

**Other Comments**

Please ensure the above referenced data is considered in the planning process in relation to Appropriate Assessment (AA) and Environmental Impact Assessment Report (EIAR) stages as required. In the meantime if you have any questions in relation to our data sets please or if we can be of further assistance, please do not hesitate to contact me, Dr. Clare Glanville ([clare.glanville@dcae.gov.ie](mailto:clare.glanville@dcae.gov.ie))

Yours sincerely

**Dr. Clare Glanville**  
Planning and Geoheritage Programme Lead

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Geological Survey Ireland, Beggars Bush, Haddington Road, Dublin D04 K7X4, Ireland.  
Suirbhéireacht Gheolaíochta Éireann, Tor an Bhacáigh, Bóthar Haddington, Baile Átha Claith D04 K7X4, Éire.  
T +353 (0)1 678 2000 **LoCall** / LóGhlao 1890 44 99 00 [www.gsi.ie](http://www.gsi.ie) *Fáiltítear roimh comhfhreagras i nGaeilge*





Paul Christy  
Senior Executive Planner  
Donegal County Council  
- by email

[PAUL.CHRISTIE@donegalcoco.ie](mailto:PAUL.CHRISTIE@donegalcoco.ie)  
[MMCELROY@donegalcoco.ie](mailto:MMCELROY@donegalcoco.ie)

Date: 4<sup>th</sup> November 2020

Dear Mr Christy,

**SEA & HRA Scoping Consultation for Co Donegal Dev Plan Variation re. TEN-T Roads Improvements Project**

I refer to your e-mailed letter and consultation documents to this Council dated 13<sup>th</sup> October 2020 regarding the above-mentioned matter. Thank you for the consultation and opportunity to input to the process. The matter has been considered at the recent meeting of the Planning Committee and comments are as follows:

**Preliminary Comments**

This project relates to 3 road sections, namely:


- 1) the N15 to by-pass Ballybofey-Stranorlar
- 2) the N13 near Letterkenny, to improve its access towards Derry, Strabane and to Sligo
- 3) the N14 from near Letterkenny to Lifford / Strabane / A5 Link


Derry City and Strabane District and Donegal County together form the North-West Region, which is considered to be a functional economic and spatial region and the two respective Councils work closely together, co-operating to develop and market the region jointly for the benefit of both districts. Both Governments and the Councils have been mutually supportive of the suite of longstanding major roads proposals on both sides of the border which have been considered to be complementary and important infrastructure for the whole region, including the new A6, new A5, A2 Upgrade and these 3 roads. Together, they will significantly improve journey times between these key settlements within this region and provide external connectivity to / from the region to Belfast, Dublin and Sligo / the 'Atlantic Corridor'.

Derry  
C/o Council Offices  
98 Strand Road  
Derry  
BT48 7NN

Strabane  
C/o Council Offices  
47 Derry Road  
Strabane  
BT82 8DY

t: +44 (0) 2871 253 253  
e: [info@derrycityandstrabanedistrict.com](mailto:info@derrycityandstrabanedistrict.com)

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[www.derrycityandstrabanedistrict.com](http://www.derrycityandstrabanedistrict.com)

The NW Region and its infrastructure, including the 3 roads in question, have been consistent with many government, regional and Council documents in recent years, including the RoI National Planning Framework, the NW Regional Spatial & Economic Strategy, Co Donegal Development Plan, the NI Regional Development Strategy 2035 and indeed this Council's recent Local Development Plan draft Plan Strategy (LDP dPS). Derry and Letterkenny are identified as a 'Linked Gateway' in the RDS and, together with Strabane, the 3 settlements are being considered as a 'cross-border Metropolitan City Region' in the NPF and RSES. Therefore, Derry City & Strabane District Council (DC&SDC) is very aware of and supportive of these 3 major and strategic roads improvements.

Specifically, please see the recent LDP dPS documents which reference these roads: [https://www.derrystrabane.com/getmedia/f0dfee6f-7ba0-4422-8a29-6163562286e2/DC-SDC-Local-Development-Plan-final-online\\_1.pdf](https://www.derrystrabane.com/getmedia/f0dfee6f-7ba0-4422-8a29-6163562286e2/DC-SDC-Local-Development-Plan-final-online_1.pdf) In particular, see Paras. 2.3, 2.32, 2.34, 2.50-2.57 and Chapter 11 especially Para 11.20. Cross-border connectivity including these road proposals were also referenced in the LDP Transport Evidence Base Paper EVB 11 – Paras 3.70 & 5.5 (as well as 11A NW West Transport Study). [https://www.derrystrabane.com/Subsites/LDP/LDP-draft-Plan-Strategy-\(dPS\)/LDP-Plan-Documents](https://www.derrystrabane.com/Subsites/LDP/LDP-draft-Plan-Strategy-(dPS)/LDP-Plan-Documents)

Road No 1, to bypass Ballybofey-Stranorlar will be very beneficial as it links Derry – Letterkenny (N13) and Strabane (N15) to Sligo, Galway and the 'Atlantic Corridor'.


Road No 2, near Letterkenny, will also be very beneficial as it will significantly improve the link between Derry and Letterkenny themselves (N13), their links to the 'Atlantic Corridor' and also the link from Letterkenny to Strabane and onwards to Dublin. A key theme in the NW Transport Plan, the LDP and in the Donegal CDP is to encourage modal change, away from the private car towards public transport and to aspire to provide Park and Ride / Share facilities at key locations near and beyond Derry (and Letterkenny) – see LDP Para. 11.29. Therefore, it would be important to have adequate land and design these (bus and P&R/S) facilities into this particular scheme – of major road junctions at the edge of Letterkenny. (It may be useful for NTA / designers to liaise with DfI regarding complementary proposals for P&Rs at Bunrana Rd, Derry and at Strabane.)


Whilst all 3 roads projects will be beneficial for the whole Region, only Road No 3 will have a direct interface with Derry City & Strabane District i.e. this N14 from near Letterkenny to Lifford / Strabane will involve a new road bridge over the River Finn and linking to the new A5 WTC just off the Urney Road at Castletown, at the SW edge of Strabane. The map supplied does not show clearly the location / extent of the Preferred Option corridor to the south of the N15 down to the River Finn; therefore, it is difficult to establish exactly where this bridge would be located. Presumably, this has been co-ordinated with the plans for the A5 WTC, Junction 7, as shown on p21 of <https://www.a5wtc.com/Documents/7756/Download>

Derry  
C/o Council Offices  
98 Strand Road  
Derry  
BT48 7NN

Strabane  
C/o Council Offices  
47 Derry Road  
Strabane  
BT82 8DY

t: +44 (0) 2871 253 253  
e: [info@derrycityandstrabanedistrict.com](mailto:info@derrycityandstrabanedistrict.com)

 Derry City & Strabane District Council

 @dcscouncil

[www.derrycityandstrabanedistrict.com](http://www.derrycityandstrabanedistrict.com)

**a) Comments regarding Strategic Environmental Appraisal (SEA)**

We have read the SEA Screening Report and it seems to be reasonable, having covered all the main potential environmental impacts and concluding that 'the proposed variation would be likely to have significant effects on the environment' and hence that it is necessary to undertake a full Strategic Environmental Appraisal Report for the project. It is noted that one of the reasons for requiring SEA is *'The fact that the variation has the potential to give rise to transboundary effects including: impacts on Natura 2000 sites, air pollution, noise pollution and landscape impacts.'*

Based upon the Screening Report, observations in relation to the scope / content of the SEA Report includes:

- It may be useful to name the Local Development Plan (LDP 2032) for Derry City and Strabane District, as 'another plan' that is influenced by the project – see background above.
- It may be useful to consider the above-mentioned Park and Ride / Share facilities at key locations, on each of the 3 Road Sections (particularly section 2), as a means of reducing car usage in both districts, and mitigating negative impacts – see background above.
- It would be important to clarify on the nature and extent of this road project No 3 (and bridge?), so that the project / impacts may be assessed – see background above.
- Section 3 and Section 1 corridors have correctly been identified as being upstream, with potential impacts on this District, particularly the River Finn SAC, the River Foyle & Tributaries SAC (and Moneygal Bog SAC & Owenkillew SAC and the Sperrin AONB – though their links are likely to be much less) – which can be further assessed.

**b) Comments regarding Appropriate Assessment – Natura 2000 Habitats Regulations Assessment**

We have also read the HRA Appropriate Assessment Screening Report and it too seems to be reasonable, having covered all the main potential impacts on the Natura 2000 European sites, and concluding that a full Appropriate Assessment is necessary 'as it cannot be excluded, on the basis of objective information, that the proposed variation, either individually or in combination with other plans and projects, will have a significant effect on a European Site.


Based upon the AA Screening Report, observations in relation to the scope / content of the AA Report includes:


- It would be important to clarify on the nature and extent of this road project No 3 (and bridge?), so that the project / impacts may be assessed – see background above.
- Section 3 and Section 1 corridors have correctly been identified as being upstream, with potential impacts on this District, particularly the River Finn SAC, the River Foyle & Tributaries SAC (the Moneygal Bog SAC & Owenkillew SAC have been effectively screened out, as impacts are 'unlikely') – which can be further assessed.

Derry  
C/o Council Offices  
98 Strand Road  
Derry  
BT48 7NN

Strabane  
C/o Council Offices  
47 Derry Road  
Strabane  
BT82 8DY

t: +44 (0) 2871 253 253  
e: [info@derrycityandstrabanedistrict.com](mailto:info@derrycityandstrabanedistrict.com)

 Derry City & Strabane District Council

 @dcsdcouncil

[www.derrycityandstrabanedistrict.com](http://www.derrycityandstrabanedistrict.com)

I trust that these comments from this Council are useful and assist you in progressing with the respective SEA and AA procedures. Whilst this consultation appears to have been issued to 'each Environmental Authority and Adjoining Planning Authority', it is not clear if it the formal environmental consultation body in Northern Ireland has been consulted; if not, please consult DAERA SEA Team on: [SEATeam@daera-ni.gov.uk](mailto:SEATeam@daera-ni.gov.uk) and DAERA CDP Team at [CDP@daera-ni.gov.uk](mailto:CDP@daera-ni.gov.uk)

If you do require any further clarification, please do not hesitate to contact Head of Planning, Maura Fox or Proinsias McCaughey, Principal Planning Officer in Local Development Planning.

Yours sincerely


*Christopher Jackson*


Planning Committee Chair

Derry  
C/o Council Offices  
98 Strand Road  
Derry  
BT48 7NN

Strabane  
C/o Council Offices  
47 Derry Road  
Strabane  
BT82 8DY

t: +44 (0) 2871 253 253  
e: [info@derrycityandstrabanedistrict.com](mailto:info@derrycityandstrabanedistrict.com)

 Derry City & Strabane District Council

 @dcscouncil

[www.derrycityandstrabanedistrict.com](http://www.derrycityandstrabanedistrict.com)



Mr Paul Christy  
Senior Executive Planner  
Central Planning Unit  
Donegal County Council  
County House  
Lifford  
Co Donegal  
F93 Y62Z

22<sup>nd</sup> October 2020

Our Ref: 200709.2

**Re. SEA Screening for the Proposed Variation to the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Project (Variation No. 1).**

Dear Mr Christy,

We acknowledge your notice, dated 13th October 2020, in relation to the SEA Screening for the Proposed Variation No. 1 to the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Project ('the Variation') and associated Strategic Environmental Assessment (SEA) screening.

The EPA is one of five statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.

As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via our attached guidance document '[SEA of Local Authority Land Use Plans – EPA Recommendations and Resources](#)'. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority



land use plans. We suggest that you take this guidance document into account and incorporate the relevant recommendations as relevant and appropriate to the Variation.

#### **Proposed SEA Determination**

We note your proposed determination that SEA is required for the Variation. Further comment may be provided at the next stage of the SEA process.

Guidance on the SEA process, including an SEA pack and checklist available on our website at [www.epa.ie/monitoringassessment/assessment/sea/](http://www.epa.ie/monitoringassessment/assessment/sea/). We recommend that you take the available guidance into account in finalising your SEA Screening Determination and incorporate the relevant recommendations as relevant and appropriate to the Variation.

#### **Sustainable Development**

In proposing and in implementing the Variation, Donegal County Council should ensure that the Variation is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Variation.

In considering the Variation, Donegal County Council should take into account the need to align with national commitments on climate change mitigation and adaptation, as well as incorporating any relevant recommendations in sectoral, regional and local climate adaptation plans.

Donegal County Council should also ensure that the Variation aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Northern & Western Regional Spatial and Economic Strategy.

#### **State of the Environment Report – Ireland’s Environment 2016**

In preparing the Variation, the recommendations, key issues and challenges described in our most recent State of the Environment Report [Ireland’s Environment – An Assessment 2016](#) (EPA, 2016) should be considered, as relevant and appropriate to the Variation.

#### **Available Guidance & Resources**

Our website contains various SEA resources and guidance, including:

- SEA process guidance and checklists
- Inventory of spatial datasets relevant to SEA
- topic specific SEA guidance (including *Good practice note on Cumulative Effects Assessment* (EPA, 2020), *Guidance on SEA Statements and Monitoring* (EPA, 2020), *Integrating climatic factors into SEA* (EPA, 2019), *Developing and Assessing Alternatives in SEA* (EPA, 2015), and *Integrated Biodiversity Impact Assessment* (EPA, 2012))

You can access these resources at: [www.epa.ie/monitoringassessment/assessment/sea/](http://www.epa.ie/monitoringassessment/assessment/sea/)

#### ***Environmental Sensitivity Mapping (ESM) WebTool***



This new tool was launched recently by the EPA. It is a new decision support tool to assist SEA and planning processes in Ireland. It is available at [www.enviromap.ie](http://www.enviromap.ie). The tool brings together over 100 datasets and allows users to create plan-specific environmental sensitivity maps. These maps can help planners examine environmental considerations, anticipate potential land-use conflicts, and help identify suitable development locations while also protecting the environment.

***EPA SEA WebGIS Tool***

Our SEA WebGIS Tool has been updated recently and is now publicly available at <https://gis.epa.ie/EPAMaps/SEA>. It allows public authorities to produce an indicative report on key aspects of the environment in a specific geographic area. It is intended to assist public authorities in SEA screening and scoping exercises.

***EPA WFD Application***

Our WFD Application provides access to water quality and catchment data from the national WFD monitoring programme. The Application is accessed through EDEN <https://wfd.edenireland.ie/> and is available to public agencies. Publicly available data can be accessed via the [www.catchments.ie](http://www.catchments.ie) website.

**Future amendments to the Variation**

Where changes to the Plan are made prior to finalisation, or where modifications to the Plan are proposed following its adoption, these should be screened for potential for likely significant effects in accordance with the criteria set out in Schedule 2A of the SEA Regulations (S.I. No. 436 of 2004).

**Appropriate Assessment**

You should ensure that the Variation complies with the requirements of the Habitats Directive where relevant. Where Appropriate Assessment is required, the key findings and recommendations should be incorporated into the SEA and the Variation.

***EPA AA GeoTool***

Our AA GeoTool application has been developed in partnership with the NPWS. It allows users to select a location, specify a search area and gather available information for each European Site within the area. It is available at: <http://www.epa.ie/terminalfour/AppropAssess/index.jsp>

**Environmental Authorities**

Under the SEA Regulations, prior to making your SEA determination you should also consult with:

- The Minister for Housing, Planning and Local Government,
- The Minister for Agriculture, Food and the Marine, and the Minister for the Environment, Climate and Communications, where it appears to you as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects on fisheries or the marine environment,



- The Minister for Culture, Heritage and the Gaeltacht where it appears to you as the competent authority that the plan or programme, or modification to a plan or programme, might have significant effects in relation to the architectural or archaeological heritage or to nature conservation, and
- any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.

If you have any queries or need further information in relation to this submission, please contact me directly. I would be grateful if you could send an email confirming receipt of this submission to: [sea@epa.ie](mailto:sea@epa.ie).

Yours sincerely,

A handwritten signature in black ink that reads 'David Galvin'.

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David Galvin  
SEA Section  
*Office of Evidence and Assessment*



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**From:** Sinead McEvoy [<mailto:Sinead.McEvoy@fermanaghomagh.com>]  
**Sent:** 04 November 2020 13:26  
**To:** MAEVE MC ELROY  
**Cc:** Deirdre McSorley  
**Subject:** Re: Proposed Variation to the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Improvement Project, Donegal (Variation No. 1)

CAUTION: This email originated from outside of Donegal County Council.  
Do not click links or open attachments unless you recognise the sender and are sure that the content is safe.

Dear Ms. McElroy,

Thank you for your emails below and attached correspondence.

Fermanagh Omagh District Council note the contents of the attached correspondence in respect of "Proposed Variation to the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Improvement Project, Donegal (Variation No. 1)" and have no comment to make on this.

Kind regards

Sinead McEvoy  
Principal Planning Officer  
Planning Department  
Fermanagh and Omagh District Council

Email: [sinead.mcevoy@fermanaghomagh.com](mailto:sinead.mcevoy@fermanaghomagh.com)  
Tel: 0300 303 1777

## **APPENDIX C**

### **Details of Natura 2000 sites screened in to Stage 2 Appropriate Assessment**

**Table C1: Details of Natura 2000 sites screened into Stage 2 Appropriate Assessment**

Site Code	Site Name	Qualifying Interests / Special Conservation Interests	Conservation Objectives
2287	Lough Swilly SAC	1130 Estuaries 1150 * Coastal lagoons 1330 Atlantic salt meadows ( <i>Glauco-Puccinellietalia maritima</i> ) 1355 Otter <i>Lutra lutra</i> 91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles	19 <sup>th</sup> July 2011 Version 1 <ul style="list-style-type: none"> <li>To maintain the favourable conservation condition of Estuaries, as defined by 2 no. attributes and targets;</li> <li>To restore the favourable conservation condition of Coastal Lagoons, as defined by 11 no. attributes and targets;</li> <li>To restore the favourable conservation condition of Atlantic salt meadows, as defined by 10 no. attributes and targets;</li> <li>To restore the favourable conservation condition of Otter, as defined by 8 no. attributes and targets; and</li> <li>To restore the favourable conservation condition of Old sessile oak woods, as defined by 12 no. attributes and targets.</li> </ul>
2301	River Finn SAC	3110 Oligotrophic waters containing very few minerals of sandy plains ( <i>Littorelletalia uniflorae</i> ) 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> 7130 Blanket bogs (* if active bog) 7140 Transition mires and quaking bogs 1106 Salmon <i>Salmo salar</i> 1355 Otter <i>Lutra lutra</i>	31 <sup>st</sup> May 2017 Version 1 <ul style="list-style-type: none"> <li>To restore the favourable conservation condition of Oligotrophic waters, as defined by 18 no. attributes and targets;</li> <li>To restore the favourable conservation condition of Northern Atlantic wet heaths, as defined by 20 no. attributes and targets;</li> <li>To restore the favourable conservation condition of Blanket bogs, as defined by 19 no. attributes and targets;</li> <li>To restore the favourable conservation condition of Transition mires and quaking bogs, as defined by 13 no. attributes and targets;</li> <li>To maintain the favourable conservation condition of Salmon, as defined by 6 no. attributes and targets;</li> <li>To maintain the favourable conservation condition of Otter, as defined by 7 no. attributes and targets;</li> </ul>
4060	Lough Fern SPA	A059 Pochard <i>Aythya ferina</i>	7 <sup>th</sup> April 2020 Generic Version 7 To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.
4075	Lough Swilly SPA	A005 Great Crested Grebe <i>Podiceps cristatus</i> A028 Grey Heron <i>Ardea cinerea</i>	19 <sup>th</sup> July 2011 Version 1 NPWS <ul style="list-style-type: none"> <li>To maintain the favourable conservation condition of Great Crested Grebe,</li> </ul>

Site Code	Site Name	Qualifying Interests / Special Conservation Interests	Conservation Objectives
		<p>A038 Whooper Swan <i>Cygnus cygnus</i>                      A043 Greylag Goose <i>Anser anser</i>                      A048 Shelduck <i>Tadorna tadorna</i>                      A050 Wigeon <i>Anas penelope</i>                      A052 Teal <i>Anas crecca</i>                      A053 Mallard <i>Anas platyrhynchos</i>                      A056 Shoveler <i>Anas clypeata</i>                      A062 Scaup <i>Aythya marila</i>                      A067 Goldeneye <i>Bucephala clangula</i>                      A069 Red-breasted Merganser <i>Mergus serrator</i>                      A125 Coot <i>Fulica atra</i>                      A130 Oystercatcher <i>Haematopus ostralegus</i>                      A143 Knot <i>Calidris canutus</i>                      A149 Dunlin <i>Calidris alpina</i>                      A160 Curlew <i>Numenius arquata</i>                      A162 Redshank <i>Tringa totanus</i>                      A164 Greenshank <i>Tringa nebularia</i>                      A179 Black-headed Gull <i>Chroicocephalus ridibundus</i>                      A182 Common Gull <i>Larus canus</i>                      A191 Sandwich Tern <i>Sterna sandvicensis</i>                      A193 Common Tern <i>Sterna hirundo</i>                      A395 Greenland White-fronted goose <i>Anser albifrons flavirostris</i> wintering                      A999 Wetlands &amp; Waterbirds</p>	<p>as defined by 2 no. attributes and targets;</p> <ul style="list-style-type: none"> <li>• To maintain the favourable conservation condition of Grey Heron, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Whooper Swan, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Greylag Goose, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Shelduck, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Wigeon, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Teal, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Mallard, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Shoveler, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Scaup, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Goldeneye, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Red-breasted Merganser, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Coot, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Oystercatcher, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Knot, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Dunlin, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Curlew, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Redshank, as defined</li> </ul>

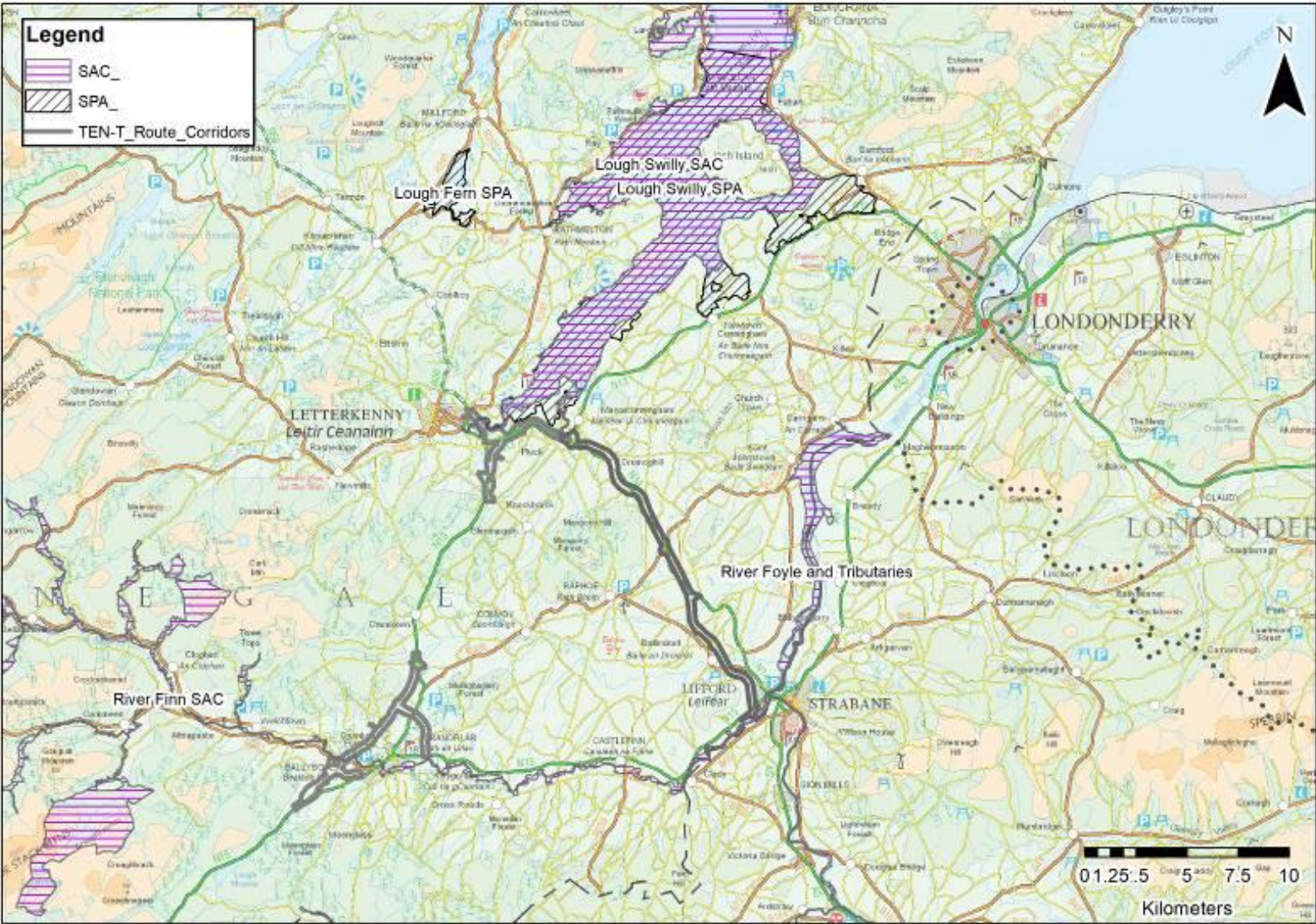
Site Code	Site Name	Qualifying Interests / Special Conservation Interests	Conservation Objectives
			<p>by 2 no. attributes and targets;</p> <ul style="list-style-type: none"> <li>• To maintain the favourable conservation condition of Greenshank, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Black-headed Gull, as defined by 3 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Common Gull, as defined by 2 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Sandwich Tern, as defined by 3 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Common Tern, as defined by 3 no. attributes and targets;</li> <li>• To maintain the favourable conservation condition of Greenland White-fronted goose, as defined by 2 no. attributes and targets; and</li> <li>• To maintain the favourable conservation condition of Wetlands &amp; Waterbirds, as defined by 1 no. attribute and target.</li> </ul>
4039	Derryveagh & Glendowan Mountains SPA	A001 Red-throated Diver <i>Gavia stellata</i> A098 Merlin <i>Falco columbarius</i> A103 Peregrine <i>Falco peregrinus</i> A140 Golden Plover <i>Pluvialis apricaria</i> A466 Dunlin <i>Calidris alpina schinzii</i>	7 <sup>th</sup> April 2020 Version 5 NPWS To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA.
UK0030 320	River Foyle and Tributaries	3260 Water courses of plain to montane levels with the <i>Ranunculion fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation 1106 Atlantic salmon <i>Salmo salar</i> 1355 Otter <i>Lutra lutra</i>	27 <sup>th</sup> July 2017 Version 3 DAERA To maintain (or restore where appropriate) the Qualifying Interests to favourable condition, as defined by: <ul style="list-style-type: none"> <li>• 2 no. objectives for Atlantic Salmon;</li> <li>• 4 no. objectives for Water courses of plain to montane levels; and</li> <li>• 2 no. objectives for Otter.</li> </ul>



## **APPENDIX D**

### **Map of Natura 2000 sites that may be affected by the Proposed Variation to the Donegal CDP in respect of the TEN-T PRIPD**

Figure D.1: Map of Natura 2000 sites that may be affected by the Proposed Variation to the Donegal CDP





## **APPENDIX E**

# **IMPACT ASSESSMENT SCREENING MATRIX FOR PROPOSED VARIATION TO THE DONEGAL CDP 2018- 2024 IN RESPECT OF THE TEN-T PRIPD**

**Table E.1: Impact Assessment Screening Matrix for Proposed Variation to the Donegal CDP 2018-2024 in respect of the TEN-T PRIPD**

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
<b>PART A THE STRATEGIC PLAN</b>						
<b>Chapter 1 Introduction and Vision</b>						
<p><b>Ref:</b> 1.</p> <p><b>Amendment:</b> Insert new objective S-O-11</p>	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	<p><b>River Finn SAC:</b> Section 1 (N15/N13 Ballybofey / Stranorlar Urban Region) and Section 3 (N14 Manorcunningham to Lifford / Strabane / A5 Link) preferred route corridors of the TEN-T PRIPD directly intersect River Finn SAC in the townlands of Cappry, Ironworks and Drumboe Lower and in the townland of Curraghalane, Lifford, respectively. Furthermore, large sections of these preferred route corridors are situated upstream of the site.</p> <p>The proposed amendment facilitates progression of the TEN-T PRIPD. It is considered that, in the absence of mitigation measures, this <i>project</i> has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>• Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>• Disturbance and displacement of species within the site, including Otter, arising from the construction</li> </ul>	Potential	None	Following the strategic level in-combination effects assessment, it has been concluded that there is no potential for adverse effects to arise from the implementation of the CDP Variation acting in combination with any other plan or project.	<p>Any potential impacts on the Natura 2000 network arising from S-O-11 shall be mitigated by the following avoidance and mitigation strategy:</p> <ul style="list-style-type: none"> <li>• <b>Avoidance:</b> Potential impacts will be avoided by locating and designing the development in a manner which avoids adverse effects to the qualifying interests of the Natura 2000 sites.</li> <li>• <b>Mitigation at the Project level:</b> Potential impacts will be mitigated during the detailed design. This will include measures to avoid significant adverse effects on European sites. The project will also have to demonstrate compliance with other relevant national and European legislation, plans, and the Policies and Objectives of the CDP. Potential impacts will also be mitigated through detailed surveys, construction management plans and techniques, pollution control measures, monitoring and</li> </ul>

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>or operational phases of said road project.</p> <ul style="list-style-type: none"> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SAC:</b>                      Section 2 (N56/N13 Letterkenny to Manorcunningham) preferred route corridor of the TEN-T PRIPD directly intersects Lough Swilly SAC at 3 separate locations; Dromore/Bunnagee, Ballyrairie/Bunnagee and Rossbracken/Raymoghey. In addition, large sections of Section 2, as well as the Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link) preferred route corridor are situated adjacent to and/or upstream of the site.</p> <p>The proposed amendment facilitates progression of the TEN-T PRIPD. It is considered that, in the absence of mitigation measures, this <i>project</i> has the potential to lead to:</p> <ul style="list-style-type: none"> <li>A direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take</li> </ul>				<p>post construction reinstatement.</p> <ul style="list-style-type: none"> <li><b>Mitigation though TII Guidance for Road Schemes:</b> Potential impacts will be mitigated through adherence to a range of ecology related TII Planning and Construction Guidelines</li> </ul> <p>In particular during the project planning stage, the TEN-T PRIPD will be considered in terms of its potential for adverse effects on Natura 2000 sites. Appropriate Assessment at project level will ensure that the project complies with Article 6 of the Habitats Directive in having regard to the relevant conservation objectives, qualifying interests and threats to the integrity of Natura 2000 sites. This should focus on the potential for direct effects on River Finn SAC, Lough Swilly SAC, Lough Swilly SPA; adverse water quality effects on River Finn SAC, Lough Swilly SAC, Lough Swilly SPA and River Foyle and Tributaries SAC; and disturbance of species at River Finn SAC, Lough Swilly SAC, Lough Swilly SPA, River Foyle and Tributaries SAC and Lough Fern SPA.</p>

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>associated with said road project.</p> <ul style="list-style-type: none"> <li>Disturbance and displacement of species within the site, including Otter, arising from the construction or operational phases of said road project.</li> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SPA:</b>                      Section 2 (N56/N13 Letterkenny to Manorcunningham) preferred route corridor of the TEN-T PRIPD directly intersects Lough Swilly SPA at Dromore/Bunnagee. In addition, large sections of said preferred route corridor, as well as the Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link) preferred route corridor are situated adjacent to and/or upstream of the site.</p> <p>The proposed amendment facilitates progression of the TEN-T PRIPD. It is considered that, in the absence of mitigation measures, this <i>project</i> has the potential to lead to:</p> <ul style="list-style-type: none"> <li>A direct loss of habitat within the site arising from land take associated with the road project which the variation may in turn provide for.</li> <li>Damage, disturbance or fragmentation of habitat or the</li> </ul>				<p>Project level assessment should also consider the potential for any cumulative or in-combination adverse effects of the TEN-T PRIPD with other (completed, approved or proposed) projects within the 15km zone of influence of the preferred route corridors.</p> <p>However, adherence to the relevant requirements of national and European legislation, plans, Policies and Objectives of the Donegal County Council Development Plan 2018-2024 shall ensure that projects comply with their planning approvals and core strategy of proper planning and sustainability, there will be no potential for in combination effects.</p>

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>spread of invasive species within the site arising from land take associated with said road project.</p> <ul style="list-style-type: none"> <li>Disturbance and displacement of bird species within the site arising from the construction or operational phases of said road project.</li> <li>An adverse effect on species population density arising from: loss, or fragmentation of habitat, disturbance to bird species, impacts on migratory pathways of bird species, or adverse effects on water quality.</li> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>River Foyle and Tributaries SAC:</b>                      The nearest point of the SAC is located directly adjacent to the southernmost point of Section 3 (N14 Manorcunningham to Lifford / Strabane / A5 Link) preferred route corridor TEN-T PRIPD at Curraghane, Lifford.</p> <p>In addition, parts of the site are situated downstream of both Section 3, and the Section 1 (N15/N13 Ballybofey/Stranorlar Urban Region) preferred route corridors.</p> <p>The proposed amendment facilitates</p>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>progression of the TEN-T PRIPD. It is considered that, in the absence of mitigation measures, this <i>project</i> has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Disturbance and displacement of species within the site arising from the construction or operational phases of the road project which the variation may in turn provide for.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Fern SPA:</b> Lough Fern SPA is situated approximately 9.21km from the nearest preferred route corridor, in the catchment of the Leannan River. There is not considered to be any potential for either direct effects or adverse water quality effects on the site owing to the distance and the lack of hydrological connectivity. The Special Conservation Interest of the site, Pochard, is a migratory species, wintering at the site.</p> <p>The proposed amendment facilitates progression of the TEN-T PRIPD. It is considered that, in the absence of mitigation measures, this <i>project</i> has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• An adverse effect on species population density arising from</li> </ul>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>effects on migratory pathways of the SCI bird species.</p> <p><b>Derryveagh and Glendowan Mountains SPA:</b></p> <p>Derryveagh and Glendowan Mountains SPA is situated approximately 13km from the nearest preferred route corridor. There is not considered to be any potential for either direct effects or adverse water quality effects on the site owing to the distance and the lack of hydrological connectivity. Although the Special Conservation Interests of the site can be migratory, a review of the site information (NPWS, 2014) has determined that the 5 no. SCI species for which the site was designated are breeding residents at the site. There is therefore not considered to be any potential for adverse effects on these species arising from the Proposed Variation.</p>				
<p>Specific Action Required: <b>Avoidance/Mitigation</b>/Policy Deletion OR Amendment See Mitigation Column above.</p>						
<p><b>Chapter 2A Core Strategy</b></p>						
<p><b>Ref:</b> 2. <b>Amendment:</b> Text amendment</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
<p>Specific Action Required: None</p> <p>This amendment comprises a text alteration replacing the TEN-T network with the TEN-T PRIPD in discussing of the importance of external connections to the county, and does not alter any previous assessments.</p>						
<p><b>Ref:</b> 3.</p> <p><b>Amendment:</b> Text amendment to objective CS-O-9</p>	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	<p>See details for S-O-11</p>	<p>Potential</p>	<p>None</p>	<p>None</p>	<p>See details for S-O-11</p>
<p>Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b></p> <p>See avoidance and mitigation outlined for S-O-11.</p>						
<p><b>PART B: OBJECTIVES AND POLICIES OF THE PLAN</b></p>						
<p><b>Chapter 5 Infrastructure</b></p>						
<p><b>Ref:</b> 4.</p> <p><b>Amendment:</b> Text amendment</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>
<p>Specific Action Required: None</p> <p>This amendment comprises a deletion of text that is no longer relevant regarding the future planning of the TEN-T PRIPD. It does not affect the Appropriate Assessment of the CDP.</p>						
<p><b>Ref:</b> 5.</p> <p><b>Amendment:</b></p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>	<p>None</p>



Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
Insertion of new table and text amendment						
Specific Action Required: None This amendment includes detail on national or regional roads that form part of the strategic road network of the County. It does not affect the Appropriate Assessment of the CDP.						
<b>Ref:</b> 6.  <b>Amendment:</b> Insertion of new text	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	See details for S-O-11	Potential	None	None	See details for S-O-11
Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 7.  <b>Amendment:</b> Insertion of new table 5.1B	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	See details for S-O-11	Potential	None	None	See details for S-O-11
Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b>	• River Finn SAC	See details for S-O-11	Potential	None	None	See details for S-O-11

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
8. <b>Amendment:</b> Amendment to objective T-O-1	<ul style="list-style-type: none"> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>					
Specific Action Required: <b>Avoidance/Mitigation/</b> Policy Deletion OR Amendment See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 9. <b>Amendment:</b> Insert new objective T-O-1A	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	See details for S-O-11	Potential	None	None	See details for S-O-11
Specific Action Required: <b>Avoidance/Mitigation/</b> Policy Deletion OR Amendment See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 10. <b>Amendment:</b> Amendment to objective T-O-7	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> </ul>	See details for S-O-11	Potential	None	None	See details for S-O-11

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
	<ul style="list-style-type: none"> <li>Lough Fern SPA</li> <li>Derryveagh and Glendowan Mountains SPA</li> </ul>					
Specific Action Required: <b>Avoidance/Mitigation/</b> Policy Deletion OR Amendment See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 11.  <b>Amendment:</b> Amendment to policy T-P-1	<ul style="list-style-type: none"> <li>River Finn SAC</li> <li>Lough Swilly SAC</li> <li>Lough Swilly SPA</li> <li>River Foyle and Tributaries SAC</li> <li>Lough Fern SPA</li> <li>Derryveagh and Glendowan Mountains SPA</li> </ul>	See details for S-O-11	Potential	None	None	See details for S-O-11
Specific Action Required: <b>Avoidance/Mitigation/</b> Policy Deletion OR Amendment See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 12.  <b>Amendment:</b> Amendment to Policy T-P-24	None	None	None	None	None	None
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
<b>Chapter 7 The Natural and Built Heritage</b>						
<b>Ref:</b>	Potentially all sites	NH-P-10 is likely to have generally	None	None	None	See details for S-O-11

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
13. <b>Amendment:</b> Amendment to Policy NH-P-10	that are directly intersected by the preferred route corridors of the TEN-T PRIPD: <ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> </ul>	positive environmental effects; however there is potential for adverse effects on European sites that are directly intersected by the preferred route corridors of the TEN-T PRIPD should the need for provision of strategic infrastructure be prioritized over the protection of stands of existing trees/hedgerows/woodlands. However within these Natura 2000 sites, any prioritization given to the TEN-T PRIPD under this policy amendment would in turn be superseded by the statutory protections afforded to Natura 2000 sites under the Habitats Directive. On this basis, the potential for adverse effects on the Qualifying Interests/Special Conservation Interests of these sites arising from the proposed amendment can be excluded.				
Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 14. <b>Amendment:</b> Amendment to Policy BH-P-3	None	None	None	None	None	None
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
<b>Ref:</b>	None	None	None	None	None	None

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
15. <b>Amendment:</b> Amendment to Policy BH-P-4						
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
16. <b>Ref:</b> <b>Amendment:</b> Amendment to Policy BH-P-5	None	None	None	None	None	None
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
17. <b>Ref:</b> <b>Amendment:</b> Amendment to Policy AH-P-1	None	None	None	None	None	None
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
18. <b>Ref:</b> <b>Amendment:</b> Amendment to Policy AH-P-3	None	None	None	None	None	None
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
<b>Ref:</b> 19.  <b>Amendment:</b> Amendment to Policy AH-P-4	None	None	None	None	None	None
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
<b>Ref:</b> 20.  <b>Amendment:</b> Amendment to Policy AH-P-5	None	None	None	None	None	None
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
<b>Chapter 9 Tourism</b>						
<b>Ref:</b> 21.  <b>Amendment:</b> Amendment to objective TOU-O-11	None	None	None	None	None	None
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
<b>Chapter 10 The Marine Resource and Coastal Management</b>						
<b>Ref:</b> 22.  <b>Amendment:</b> Amendment to Policy	None	None	None	None	None	None

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
MRCM-P-7						
Specific Action Required: Avoidance/Mitigation/Policy Deletion OR Amendment None.						
<b>PART C OBJECTIVES AND POLICIES OF THE TOWNS</b>						
<b>Chapter 12 Letterkenny</b>						
<b>Ref:</b> 23.  <b>Amendment:</b> Insert new zoning objective as new row in Table 12.2 (Established Development)	None	None	None	None	None	None
Specific Action Required: None						
<b>Ref:</b> 24.  <b>Amendment:</b> Insert new zoning objective as new row in Table 12.2 (Strategic Residential Reserve).	None	None	None	None	None	None
Specific Action Required: None						
<b>Ref:</b> 25.  <b>Amendment:</b>	None	None	None	None	None	None

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
Insert new zoning objective as new row in Table 12.2 (General Employment).						
Specific Action Required: None						
<p><b>Ref:</b> 26.</p> <p><b>Amendment:</b> Insert new zoning objective as new row in Table 12.2 (Open Space).</p>	<p>Potentially sites that are adjacent to or downstream of the preferred route corridors of the TEN-T PRIPD in land currently zoned as Open Space in Letterkenny:</p> <ul style="list-style-type: none"> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> </ul>	<p>The Zoning Objective for Open Space in Letterkenny is likely to have generally positive environmental effects; however there is potential for adverse effects on European sites that are situated adjacent to or downstream of the preferred route corridors of the TEN-T PRIPD. This is due to the location of certain areas currently zoned as 'Open Space' in Letterkenny, which are adjacent to European site boundaries; the potential for adverse effects can more definitively be assessed at TEN-T PRIPD project level, and has been included here as a precautionary measure. There is not considered to be any potential for direct effects, as land zoned as open space is adjacent to but not within Lough Swilly SAC / SPA.</p> <p>It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• An adverse effect on water quality within the sites arising from the</li> </ul>	Potential	None	None	See details for S-O-11



Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		construction or operational phases of said road project. • Disturbance and displacement of species within the sites, including Otter (Lough Swilly SAC) and designated bird species (Lough Swilly SPA), arising from the construction or operational phases of said road project.				
Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 27.  <b>Amendment:</b> Amendment to policy LK-T-P-4:	None	None	None	None	None	None
Specific Action Required: None.						
<b>Chapter 15 Settlement Frameworks</b>						
<b>Ref:</b> 28.  <b>Amendment:</b> Insert new zoning objective as last row in Table 15.2 (Amenity and Open Space).	Potentially sites that are adjacent to or downstream of the preferred route corridors of the TEN-T PRIPD in land currently zoned as Amenity and Open Space in Settlement Frameworks: • River Finn SAC	The Zoning Objective for Amenity and Open Space in Settlement Frameworks is likely to have generally positive environmental effects; however there is potential for adverse effects on European sites that are situated adjacent to or downstream of the preferred route corridors of the TEN-T PRIPD should the need for provision of strategic infrastructure be prioritized over the conservation of lands zoned as Amenity and Open Space. There is not considered to be	Potential	None	None	See details for S-O-11

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>any potential for direct effects, as land zoned as Amenity and Open space is not located within any Natura site, however land currently zoned as Amenity and Open space is located adjacent to and upstream of River Finn SAC in the area proposed for Section 1 of the TEN-T PRIPD in Ballybofey. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• An adverse effect on water quality in the site arising from the construction or operational phases of said road project.</li> <li>• Disturbance and displacement of species within the site, including Otter, arising from the construction or operational phases of said road project.</li> </ul>				
<p>Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b>            See avoidance and mitigation outlined for S-O-11.</p>						
<p><b>Ref:</b> 29. <b>Amendment:</b> Insert new zoning objective in Table 15.2 (Established development).</p>	None	None	None	None	None	None

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
Specific Action Required: None						
<b>Ref:</b> 30.  <b>Amendment:</b> Insert new zoning objective in Table 15.2 (Economic development).	None	None	None	None	None	None
Specific Action Required: None						
<b>Ref:</b> 31.  <b>Amendment:</b> Insert new zoning objective in Table 15.2 (Local environment).	None	None	None	None	None	None
Specific Action Required: None						
<b>Ref:</b> 32.  <b>Amendment:</b> Insert new zoning objective in Table 15.2 (Recreation and amenity).	None	None	None	None	None	None
Specific Action Required: None						
<b>Ref:</b>	None	None	None	None	None	None

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
33. <b>Amendment:</b> Insert new zoning objective in Table 15.2 (Strategic Residential Reserve).						
Specific Action Required: None						
<b>Mapping Amendments</b>						
<b>Ref:</b> 1. <b>Amendment:</b> Replacement of Core Strategy Map 2A.1	None	None	None	None	None	None
Specific Action Required: None These roads are described within the text of the CDP as comprising part of the SRN of the County. Their addition to Map 2.1 is for the purpose of clarity and does not affect the Appropriate Assessment of the CDP.						
<b>Ref:</b> 2. <b>Amendment:</b> Replacement of TEN-T Network Map 5.1.1	None	None	None	None	None	None
Specific Action Required: None These roads are described within the text of the CDP as comprising part of the SRN of the County. Their addition to Map 5.1.1 is for the purpose of clarity and does not affect the Appropriate Assessment of the CDP.						
<b>Ref:</b>	None	None	None	None	None	None

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
<p>3.</p> <p><b>Amendment:</b> Replacement of Strategic Road Network Map 5.1.2</p>						
<p>Specific Action Required: None</p> <p>These roads are described within the text of the CDP as comprising part of the SRN of the County. Their addition to Map 5.1.2 is for the purpose of clarity and does not affect the Appropriate Assessment of the CDP.</p>						
<p>4.</p> <p><b>Ref:</b></p> <p><b>Amendment:</b> Replacement of N14 Letterkenny to Lifford Map 5.1.4</p>	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	<p><b>River Finn SAC:</b></p> <p>Section 3 (N14 Manorcunningham to Lifford / Strabane / A5 Link) preferred route corridor of the TEN-T PRIPD directly intersects River Finn SAC in the townland of Curraghalane, Lifford. Furthermore, a large section of this preferred route corridor is situated upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>• Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>• Disturbance and displacement of species within the site, including</li> </ul>	<p>Potential</p>	<p>None</p>	<p>None</p>	<p>See details for S-O-11</p>

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>Otter, arising from the construction or operational phases of said road project.</p> <ul style="list-style-type: none"> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SAC:</b> A large section of the preferred route corridor Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link) is situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>Disturbance and displacement of species within the site, including Otter, arising from the construction or operational phases of said road project.</li> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SPA:</b> A large section of the preferred route corridor Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link) is situated adjacent to and/or upstream of the site. It is considered that, in the</p>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Disturbance and displacement of bird species within the site arising from the construction or operational phases of said road project.</li> <li>• An adverse effect on species population density arising from: disturbance to bird species, effects on migratory pathways of bird species, or adverse effects on water quality.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>River Foyle and Tributaries SAC:</b>                      The nearest point of the SAC is located directly adjacent to the southernmost point of Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link) preferred route corridor TEN-T PRIPD at Curraghalane, Lifford. In addition, parts of the site are situated downstream of Section 3. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<ul style="list-style-type: none"> <li>Disturbance and displacement of species within the site arising from the construction or operational phases of said road project.</li> <li>An adverse effect on water quality in the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Fern SPA:</b> Lough Fern SPA is situated approximately 11km from the Section 3 preferred route corridor, in the catchment of the Leannan River. The Special Conservation Interest of the site, Pochard, is a migratory species, wintering at the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>An adverse effect on species population density arising from: effects on migratory pathways of the SCI bird species.</li> </ul> <p><b>Derryveagh and Glendowan Mountains SPA:</b> Derryveagh and Glendowan Mountains SPA is situated approximately 13km from the nearest preferred route corridor. There is not considered to be any potential for either direct effects or adverse water quality effects on the site owing to</p>				



Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>the distance and the lack of hydrological connectivity. Although the Special Conservation Interests of the site can be migratory, a review of the site information (NPWS, 2014) has determined that the 5 no. SCI species for which the site was designated are breeding residents at the site. There is therefore not considered to be any potential for adverse effects on these species arising from the Proposed Variation.</p>				
<p>Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.</p>						
<p><b>Ref:</b> 5. <b>Amendment:</b> Replacement of N13-N15 Ballybofey Stranorlar Bypass Map 5.1.5</p>	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	<p><b>River Finn SAC:</b> Section 1 (N15/N13 Ballybofey / Stranorlar Urban Region) preferred route corridor of the TEN-T PRIPD directly intersects River Finn SAC in the townlands of Cappry, Ironworks and Drumboe Lower. Furthermore, a large section of this preferred route corridor is situated upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>• Damage, disturbance or fragmentation of habitat or the</li> </ul>	<p>Potential</p>	<p>Potential</p>	<p>None</p>	<p>See details for S-O-11</p>

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>spread of invasive species within the site arising from land take associated with said road project.</p> <ul style="list-style-type: none"> <li>Disturbance and displacement of species within the site, including Otter, arising from the construction or operational phases of said road project.</li> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SPA:</b> It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>An adverse effect on species population density arising from: effects on migratory pathways of bird species.</li> </ul> <p><b>River Foyle and Tributaries SAC:</b> Parts of the site are situated downstream of the Section 1 (N15/N13 Ballybofey/Stranorlar Urban Region) preferred route corridor. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>Disturbance and displacement of species within the site arising from</li> </ul>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>the construction or operational phases of said road project.</p> <ul style="list-style-type: none"> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Fern SPA:</b> Lough Fern SPA is situated approximately 20km from the Section 1 preferred route corridor, in the catchment of the Leannan River. The Special Conservation Interest of the site, Pochard, is a migratory species, wintering at the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>An adverse effect on species population density arising from: effects on migratory pathways of the SCI bird species.</li> </ul> <p><b>Derryveagh and Glendowan Mountains SPA:</b> Derryveagh and Glendowan Mountains SPA is situated approximately 13km from the nearest preferred route corridor. There is not considered to be any potential for either direct effects or adverse water quality effects on the site owing to the distance and the lack of hydrological connectivity. Although</p>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>the Special Conservation Interests of the site can be migratory, a review of the site information (NPWS, 2014) has determined that the 5 no. SCI species for which the site was designated are breeding residents at the site. There is therefore not considered to be any potential for adverse effects on these species arising from the Proposed Variation.</p>				
<p>Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.</p>						
<p><b>Ref:</b> 6. <b>Amendment:</b> Replacement of N56 Letterkenny Relief Road Map 5.1.6</p>	<ul style="list-style-type: none"> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	<p><b>Lough Swilly SAC:</b> Section 2 (N56/N13 Letterkenny to Manorcunningham) preferred route corridor of the TEN-T PRIPD directly intersects Lough Swilly SAC at 3 separate locations; Dromore/Bunnagee, Ballyrairie/Bunnagee and Rossbracken/Raymoghey. In addition, large sections of Section 2 are situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• A direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> </ul>	Potential	Potential	None	See details for S-O-11

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<ul style="list-style-type: none"> <li>• Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>• Disturbance and displacement of species within the site, including Otter, arising from the construction or operational phases of said road project.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SPA:</b>                      Section 2 (N56/N13 Letterkenny to Manorcunningham) preferred route corridor of the TEN-T PRIPD directly intersects Lough Swilly SPA at Dromore/Bunnagee. In addition, large sections of this preferred route corridor are situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• A direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>• Damage, disturbance or fragmentation of habitat or the</li> </ul>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>spread of invasive species within the site arising from land take associated with said road project.</p> <ul style="list-style-type: none"> <li>• Disturbance and displacement of bird species within the site arising from the construction or operational phases of said road project.</li> <li>• An adverse effect on species population density arising from: loss, or fragmentation of habitat, disturbance to bird species, effects on migratory pathways of bird species, or adverse effects on water quality.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Fern SPA:</b> Lough Fern SPA is situated approximately 9.21km from the nearest preferred route corridor, in the catchment of the Leannan River. There is not considered to be any potential for either direct effects or adverse water quality effects on the site owing to the distance and the lack of hydrological connectivity. The Special Conservation Interest of the site, Pochard, is a migratory species, wintering at the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD</p>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>An adverse effect on species population density arising from: effects on migratory pathways of the SCI bird species.</li> </ul> <p><b>Derryveagh and Glendowan Mountains SPA:</b></p> <p>Derryveagh and Glendowan Mountains SPA is situated approximately 13km from the nearest preferred route corridor. There is not considered to be any potential for either direct effects or adverse water quality effects on the site owing to the distance and the lack of hydrological connectivity. Although the Special Conservation Interests of the site can be migratory, a review of the site information (NPWS, 2014) has determined that the 5 no. SCI species for which the site was designated are breeding residents at the site. There is therefore not considered to be any potential for adverse effects on these species arising from the Proposed Variation.</p>				
<p>Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.</p>						
<p><b>Ref:</b> 7. <b>Amendment:</b></p>	None	None	None	None	None	None

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
Replacement of Scenic Amenity Map 7.1.1						
<p>Specific Action Required: None                      The mapping amendment corrects a key that was incorrectly labelled in the CDP. This does not affect the Appropriate Assessment of the CDP.</p>						
<p><b>Ref:</b> 8. <b>Amendment:</b> Replacement of Letterkenny Land Use Zoning Map 12.1B</p>	<ul style="list-style-type: none"> <li>Lough Swilly SAC</li> <li>Lough Swilly SPA</li> </ul>	<p><b>Lough Swilly SAC:</b>                      Section 2 (N56/N13 Letterkenny to Manorcunningham) preferred route corridor of the TEN-T PRIPD directly intersects Lough Swilly SAC at 3 separate locations; Dromore/Bunnagee, Ballyrairie/Bunnagee and Rossbracken/Raymoghey. In addition, large sections of Section 2 are situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>A direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>Disturbance and displacement of species within the site, including</li> </ul>	Potential	Potential	None	See details for S-O-11



Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>Otter, arising from the construction or operational phases of said road project.</p> <ul style="list-style-type: none"> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SPA:</b>                      Section 2 (N56/N13 Letterkenny to Manorcunningham) preferred route corridor of the TEN-T PRIPD directly intersects Lough Swilly SPA at Dromore/Bunnagee. In addition, large sections of the preferred route corridor are situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>A direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>Disturbance and displacement of bird species within the site arising from the construction or operational phases of said road</li> </ul>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		project. <ul style="list-style-type: none"> <li>An adverse effect on species population density arising from: loss, or fragmentation of habitat, disturbance to bird species, effects on migratory pathways of bird species, or adverse effects on water quality.</li> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul>				
Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 9. <b>Amendment:</b> Replacement of Letterkenny Transport Map 12.3	<ul style="list-style-type: none"> <li>Lough Swilly SAC</li> <li>Lough Swilly SPA</li> </ul>	<b>Lough Swilly SAC:</b> Section 2 (N56/N13 Letterkenny to Manorcunningham) preferred route corridor of the TEN-T PRIPD directly intersects Lough Swilly SAC at 3 separate locations; Dromore/Bunnagee, Ballyrairie/Bunnagee and Rossbracken/Raymoghey. In addition, large sections of Section 2 are situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to: <ul style="list-style-type: none"> <li>A direct loss of habitat within the site arising from land take</li> </ul>	Potential	Potential	None	See details for S-O-11

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>associated with the road project which the variation will in turn provide for.</p> <ul style="list-style-type: none"> <li>• Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>• Disturbance and displacement of species within the site, including Otter, arising from the construction or operational phases of said road project.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SPA:</b>                      Section 2 (N56/N13 Letterkenny to Manorcunningham) preferred route corridor of the TEN-T PRIPD directly intersects Lough Swilly SPA at Dromore/Bunnagee. In addition, large sections of the preferred route corridor are situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• A direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn</li> </ul>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		provide for. <ul style="list-style-type: none"> <li>• Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>• Disturbance and displacement of bird species within the site arising from the construction or operational phases of said road project.</li> <li>• An adverse effect on species population density arising from: loss, or fragmentation of habitat, disturbance to bird species, effects on migratory pathways of bird species, or adverse effects on water quality.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul>				
Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.						
<b>Ref:</b> 10.  <b>Amendment:</b> Replacement of Ballybofey - Stranolar Map 15.2	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	<b>River Finn SAC:</b> Section 1 (N15/N13 Ballybofey / Stranorlar Urban Region) preferred route corridor of the TEN-T PRIPD directly intersects River Finn SAC in the townlands of Cappry, Ironworks and Drumboe Lower. Furthermore, a large section of this preferred route corridor is situated upstream of the	Potential	Potential	None	See details for S-O-11

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>• Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>• Disturbance and displacement of species within the site, including Otter, arising from the construction or operational phases of said road project.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SPA:</b></p> <p>It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• An adverse effect on species population density arising from: effects on migratory pathways of the SCI bird species.</li> </ul> <p><b>River Foyle and Tributaries SAC:</b></p>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>Parts of the site are situated downstream of the Section 1 (N15/N13 Ballybofey/Stranorlar Urban Region) preferred route corridor. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Disturbance and displacement of species within the site arising from the construction or operational phases of the road project which the variation will in turn provide for.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Fern SPA:</b></p> <p>Lough Fern SPA is situated approximately 20km from the Section 1 preferred route corridor, in the catchment of the Leannan River. The Special Conservation Interest of the site, Pochard, is a migratory species, wintering at the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• An adverse effect on species population density arising from: effects on migratory pathways of the SCI bird species.</li> </ul>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p><b>Derryveagh and Glendowan Mountains SPA:</b>                      Derryveagh and Glendowan Mountains SPA is situated approximately 13km from the nearest preferred route corridor. There is not considered to be any potential for either direct effects or adverse water quality effects on the site owing to the distance and the lack of hydrological connectivity. Although the Special Conservation Interests of the site can be migratory, a review of the site information (NPWS, 2014) has determined that the 5 no. SCI species for which the site was designated are breeding residents at the site. There is therefore not considered to be any potential for adverse effects on these species arising from the Proposed Variation.</p>				
Specific Action Required: <b>Avoidance/Mitigation/Policy Deletion OR Amendment</b> See avoidance and mitigation outlined for S-O-11.						
<p><b>Ref:</b> 11. <b>Amendment:</b> Replacement of Lifford Map 15.17</p>	<ul style="list-style-type: none"> <li>• River Finn SAC</li> <li>• Lough Swilly SAC</li> <li>• Lough Swilly SPA</li> <li>• River Foyle and Tributaries SAC</li> <li>• Lough Fern SPA</li> <li>• Derryveagh and Glendowan Mountains SPA</li> </ul>	<p><b>River Finn SAC:</b>                      Section 3 (N14 Manorcunningham to Lifford / Strabane / A5 Link) preferred route corridor of the TEN-T PRIPD directly intersects River Finn SAC in the townland of Curraghalane, Lifford. Furthermore, a large section of this preferred route corridor is situated upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD</p>	Potential	Potential	None	See details for S-O-11

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Direct loss of habitat within the site arising from land take associated with the road project which the variation will in turn provide for.</li> <li>• Damage, disturbance or fragmentation of habitat or the spread of invasive species within the site arising from land take associated with said road project.</li> <li>• Disturbance and displacement of species within the site, including Otter, arising from the construction or operational phases of said road project.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SAC:</b> A large section of the preferred route corridor Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link) is situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Disturbance and displacement of species within the site, including Otter, arising from the construction</li> </ul>				



Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>or operational phases of said road project.</p> <ul style="list-style-type: none"> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Swilly SPA:</b> A large section of the preferred route corridor Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link) is situated adjacent to and/or upstream of the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>Disturbance and displacement of SCI bird species within the site arising from the construction or operational phases of said road project.</li> <li>An adverse effect on species population density arising from: disturbance to bird species, effects on migratory pathways of bird species, or adverse effects on water quality.</li> <li>An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>River Foyle and Tributaries SAC:</b></p>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>The nearest point of the SAC is located directly adjacent to the southernmost point of Section 3 (N14 Manorcunningham to Lifford/Strabane/A5 Link) preferred route corridor TEN-T PRIPD at Curraghalane, Lifford. In addition, parts of the site are situated downstream of Section 3. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead to:</p> <ul style="list-style-type: none"> <li>• Disturbance to species within the site arising from the construction or operational phases of the road project which the variation will in turn provide for.</li> <li>• An adverse effect on water quality within the site arising from the construction or operational phases of said road project.</li> </ul> <p><b>Lough Fern SPA:</b> Lough Fern SPA is situated approximately 11km from the Section 3 preferred route corridor, in the catchment of the Leannan River. The Special Conservation Interest of the site, Pochard, is a migratory species, wintering at the site. It is considered that, in the absence of mitigation measures, the TEN-T PRIPD facilitated by the proposed amendment has the potential to lead</p>				

Proposed Amendment to the CDP	Natura 2000 Sites That May Be Affected	Potential Effect of Policy /Objective	Risk of Significant Effect	Potential of In-Combination Effects	Risk of Significant In-Combination Effects	Mitigation
		<p>to:</p> <ul style="list-style-type: none"> <li>An adverse effect on species population density arising from: effects on migratory pathways of the SCI bird species.</li> </ul> <p><b>Derryveagh and Glendowan Mountains SPA:</b></p> <p>Derryveagh and Glendowan Mountains SPA is situated approximately 13km from the nearest preferred route corridor. There is not considered to be any potential for either direct effects or adverse water quality effects on the site owing to the distance and the lack of hydrological connectivity. Although the Special Conservation Interests of the site can be migratory, a review of the site information (NPWS, 2014) has determined that the 5 no. SCI species for which the site was designated are breeding residents at the site. There is therefore not considered to be any potential for adverse effects on these species arising from the Proposed Variation.</p>				
<p>Specific Action Required: <b>Avoidance/Mitigation/Policy</b> Deletion OR Amendment            See avoidance and mitigation outlined for S-O-11.</p>						