

# **SEA Statement on the Strategic Environmental Assessment of the Seven Strategic Towns Local Area Plan 2018-2024**



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# 1 INTRODUCTION

## 1.1 Terms of Reference

This is the Strategic Environmental Assessment (SEA) Statement of the Seven Strategic Towns Local Area Plan 2018-2024 (SSTLAP) for the towns of:

- An Clochán Liath (Dungloe)
- Ballybofey-Stranorlar
- Ballyshannon
- Bridgend
- Carndonagh
- Donegal Town
- Killybegs

## 1.2 SEA Definition

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

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

## 1.3 Legislative Context

Directive 2001/42/EC of the European Parliament and of the Council, of 27<sup>th</sup> June 2001, on the assessments of the effects of certain plans and programmes on the environment, referred to hereafter as the SEA Directive, introduced the requirement that an SEA be carried out on plans and programmes, including land use plans.

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

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

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

## 1.4 Content of the SEA Statement

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

- a. How environmental considerations have been integrated into the plan;
- b. How
  - i. The environmental report,
  - ii. Submissions and observations made to the planning authority in relation to the proposed plan and environmental report,
  - iii. Any transboundary consultations.
 have been taken into account during the preparation of the Plan;
- c. The reasons for choosing the Plan, as adopted, in the light of the other reasonable alternatives dealt with, and
- d. The measures decided upon to monitor the significant environmental effects of implementation of the Plan.

## 1.5 Implications of SEA for the Seven Strategic Towns Local Area Plan 2018-2024

As a result of the aforementioned legislation, the Seven Strategic Towns Local Area Plan 2018-2024 was required to undergo an SEA. This process included pre-scoping and formal scoping with stakeholders before the findings of the SEA were expressed in an Environmental Report which accompanied the Draft Seven Strategic Towns Local Area Plan 2018-2024. The Environmental Report accompanied the Draft Plan as 'Environmental Report, November 2017' and assessed the likely environmental effects of each objective and policy contained within the Draft Plan: Section 8.3 'Conclusion' of the Environmental Report includes the assessment of the Objectives and Policies, contained in Table 8.4: Assessment of Strategic Policy Objectives. The Environmental Report concluded that:

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

- *The implementation of the Seven Strategic Towns Local Area Plan 2018-2024 will have an overall positive effect on the environmental status of the Towns;*
- *Whilst a number of objectives and policies would have an overall positive impact, there may be certain elements of them that could also contain potential for conflict; where this arises the objectives and policies should be mitigated to an acceptable level\*;*
- *The impact of some objectives and policies may be uncertain;*
- *The implementation of the Plan will not give rise to probable environmental conflicts that are unlikely to be mitigated to an acceptable level\*;*

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

The Draft Plan and Environmental Report were placed on public display from Friday 24<sup>th</sup> November, 2017 until Wednesday 24<sup>th</sup> January, 2018 (both dates inclusive). A report made in respect of the submissions and observations on the published Draft Plan was presented in a Chief Executives Report dated 23<sup>rd</sup> February 2018.

<sup>2</sup> Draft Seven Strategic Towns Local Area Plan 2018-2024, Environmental Report

Donegal County Council considered the Draft Plan and Chief Executives Report (of February 2018) at a Plenary Council meeting on 26<sup>th</sup> March 2018 and decided to amend the Draft Plan, by proposing 118 Material Alterations. These Proposed Material Alterations were made available for public consultation during the period 11<sup>th</sup> May 2018 to 7<sup>th</sup> June 2018 (inclusive), accompanied by an Addendum to the Environmental Report and an Addendum to the Natura Impact Report. The Assessment of the Proposed Material Alterations is contained in Table 2.1 of the Addendum to the Environmental Report dated May 2018.

This Addendum determined that all potential effects arising from the proposed Material Alterations were either present already or would not change or would be mitigated so as not to be significant; none of the Material Alterations had a probable conflict with the status of any of the SEOs, where it was unlikely that the proposed Material Alterations could be mitigated to an acceptable level. 44 no. Material Alterations identified as having a potential conflict with the status of the SEOs however it was considered that these could be mitigated to an acceptable level through existing objectives and policies contained within the SSTLAP and the County Donegal Development Plan 2018-2024. 6 of the proposed Material Alterations were identified as having uncertain interaction with the status of SEOs, 15 as having neutral, 94 as having no likely interaction and 73 as being likely to improve

Having considered the Draft SSTLAP, the proposed Material Alterations, the Natura Impact Report(s) and the Environmental Report(s), it was resolved by Members to make the Seven Strategic Towns Local Area Plan 2018-2024 at a Special Plenary Council meeting on the 23<sup>rd</sup> July 2018.

At the meeting, Members also completed their Strategic Environmental Assessment of the SSTLAP and had regard to, inter alia:

- (1.) submissions or observations received at all stages of the process;
- (2.) the Environmental Report of November, 2017; and
- (3.) the Addendum to the Environmental Report of May, 2018.

## 2 HOW ENVIRONMENTAL CONSIDERATIONS WERE INTEGRATED INTO THE PLAN

### 2.1 Key Steps In the SEA Process

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

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

Key Steps	Dates
Preliminary Consultation	16th July 2015 - 11th September 2015
Preliminary Scoping Report for Environmental Report	September 2015
Report on the Initial Stage of Public Consultation to prepare a Local Area Plan in respect of Tier 2 Towns, October 2016	October 2015
Pre-Draft Scoping Issues Paper for SEA/AA	August 2016
Draft Plan- Public Consultation on Draft Plan/ Environmental Report/ Appropriate Assessment	24 <sup>th</sup> November 2017 – 24 <sup>th</sup> January 2018
Chief Executive's Report on Draft Plan/ Environmental Report/ Appropriate Assessment	23 <sup>rd</sup> February 2018
Adjourned Council Meeting – Resolved to make plan subject to 118 proposed Material Alterations.	26 <sup>th</sup> March 2018
Public Consultation on Material Alterations/ Addendum to Environmental Report/ Addendum to Appropriate Assessment	11 <sup>th</sup> May 2018 – 7 <sup>th</sup> June 2018 (inclusive)
Chief Executive's Report on Material Alterations/ Environmental Report/ Appropriate Assessment	4 <sup>th</sup> July 2018
Special Plenary Council Meeting (Resolved to make Plan)	23 <sup>rd</sup> July 2018

### 2.2 SEA Considerations

The preparation of the Environmental Report(s) on the likely significant effects on the environment of implementation of the SSTLAP included consideration of:

- Baseline data relating to the current state of the environment;
- Links between the SSTLAP and the County Donegal Development Plan 2018-2024, and other relevant strategies, policies, plans, programmes and environmental protection objectives;

- Key environmental issues within the Plan area boundary of each of the seven strategic towns, and the wider environmental catchments of the towns;
- The likely significant effects of policies and objectives on the environment (both positive and negative);
- Measures envisaged for the prevention, reduction and mitigation of any significant adverse effects;
- An outline of the reasons for selecting the alternatives considered; and
- Monitoring measures to ensure that any unforeseen environmental effects will be identified, allowing appropriate remedial action to be taken.

## 2.3 Consultations

In accordance with article 14E(1) of the Planning & Development Regulations 2001 (as amended) the preliminary scoping exercise was circulated to the following statutory bodies as prescribed under article 14E(1) of the aforementioned Regulations.

- Environmental Protection Agency (EPA)
- Department of Housing, Planning and Local Government
- Department of Agriculture, Food and the Marine
- Department of Communications, Climate Change and Natural Resources
- Development Applications Unit, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs
- National Parks and Wildlife Service
- Sligo County Council
- Strategic Planning Division, Department of the Environment, Northern Ireland
- Transboundary consultation with Northern Ireland Environment Agency, Department of the Environment (NI)
- Transboundary consultation with Planning Service Northern Ireland
  - Fermanagh and Omagh District Council
  - Causeway Coast and Glens Borough Council
  - Derry City and Strabane District Council

In response three submissions were received from consultees as listed below:

- Department of Agriculture, Food and Marine
- Derry City and Strabane District Council, Local Development Plan Team
- Northern Ireland Environment Agency, Department of the Environment (NI)

The submission from the Department of Agriculture, Food and Marine made reference to both the AA and the SEA processes and set out specific legislation and issues that should be considered throughout the SEA process, along with suggested sources on relevant marine data suggesting a further list of consultees that may assist in the appropriate assessment process. The other two submissions from Northern Ireland Authorities mainly concerned transboundary environmental issues for consideration particularly in relation to shared Natura 2000 sites.

The comments from the Environmental Authorities in relation to the SEA and the Council's responses are summarised in Table 2.2.



**Table 2.2: Submissions Received from Prescribed Environmental Authorities**

Submission by	Issues raised	Response
<p>Department of Agriculture, Food and Marine</p>	<ol style="list-style-type: none"> <li>1) Commented on the SEA process and highlighted a number of relevant legislation, plans and policies.</li> <li>2) Raised the following issues for consideration:                             <ol style="list-style-type: none"> <li>a) Potential impacts on marine environmental quality.</li> <li>b) Potential impact on the microbiological quality of shellfish.</li> <li>c) Impacts on human health of micro biological contaminated shellfish.</li> <li>d) Impacts on commercially important fish and shellfish stocks, licensed aquaculture sites and areas of importance for fish/shellfish and fisheries.</li> <li>e) Impacts on fresh water aquaculture operations.</li> <li>f) Designations of areas of importance to the aquaculture &amp; fisheries sector.</li> <li>g) Relevant EU Directives and National Legislation in the area of Marine Spatial Planning.</li> </ol> </li> <li>3) Stressed that major land-use changes can significantly impact the quality of the marine environment.</li> <li>4) Provided a list of Sources of marine data.</li> <li>5) Provided a list of people with whom to consult including DAFM, SFPA, Marine Institute and BIM. They also feel consideration should be given to consulting with the sea food sector. Which may include regional inshore fisheries forums, Fisheries Local Action Groups, fisheries representative’s bodies, including producer organizations, local advisory committees, association, co-operatives, seafood processors and aquaculture representative bodies etc.</li> </ol>	<ol style="list-style-type: none"> <li>1) All highlighted legislation, plans and policies will be referenced by Donegal County Council (DCC).</li> <li>2) The specific issues raised in items (2)a-f will be given cognisance in the SEA Environmental Report and these issues will be taken into consideration in relation to the appropriate assessment of any Natura 2000 site within the Natura Impact Report. DCC will reference the list of sources of marine data suggested by the Department.</li> <li>3) The Environmental Report will take into consideration all potential major land-use changes which could significantly impact on the quality of the marine environment.</li> <li>4) DCC will take into consideration the list of sources of marine data.</li> <li>5) DCC has consulted all relevant Environmental Authorities.</li> </ol>
<p>Derry City and Strabane District Council, Local Development Plan Team</p>	<ol style="list-style-type: none"> <li>1) Satisfied that intentions and level of detail outlined to ensure the minimising/mitigation of likely environmental effects when the final Plan is adopted.</li> <li>2) Highlights that the shared border contains many</li> </ol>	<ol style="list-style-type: none"> <li>1) Comments noted.</li> <li>2) DCC will insert a section as suggested into the Environmental Report and agree with the importance of joined up planning and promoting cross border</li> </ol>

Submission by	Issues raised	Response
	<p>protected sites, significant landscapes and seascapes, and also contains a great wealth of biodiversity and stresses the importance to driving local tourism and economy and would in this respect suggest that a specific section to be included in the Environmental Report. States that such a section along with the necessary informal liaison between our respective planning officials will assist in demonstrating 'joined up' planning to promote cross border collaboration.</p> <p>3) Comment on consultation in the future on Derry City and Strabane District Council's new Local Development Plan (LDP 2015-30).</p>	<p>collaboration.</p> <p>3) Note that DCC will be consulted in the near future.</p>
<p>Northern Ireland Environment Agency, Department of the Environment (NI)</p>	<p>1) Welcomes the SEA Scoping Issues Paper and screening Report for AA.</p> <p>2) States that where the Republic of Ireland has environmental connections with Northern Ireland, there is potential impacts in Northern Ireland. Anticipates that transboundary nature of any significant effects on the environment on the Republic of Ireland would be of particular relevance to consider in relation to Northern Ireland.</p> <p>3) Would like the SEA Environmental Report to contain a clear statement indicating the opinion of Donegal County Council about whether or not the implementation of the Plan, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment, is likely to have a significant effect on Northern Ireland.</p> <p>List a number of websites which highlight the current state of the environment in Northern Ireland.</p>	<p>1) The welcoming of Strategic Environmental Assessment is noted.</p> <p>2) Notes environmental transboundary concerns and if there are any likely significant adverse effects on the Republic of Ireland transboundary considerations will be applied in any measures to offset any significant adverse effects.</p> <p>3) DCC will insert a statement as required by the Northern Ireland Environment Agency into the Environmental Report.</p> <p>4) DCC will take the information sources into consideration in the preparation of the Environmental Report.</p>

## 2.4 How Consultations Informed the SEA Process

A preliminary consultation exercise was carried out for an 8 week period between 16<sup>th</sup> July 2015 and 11<sup>th</sup> September 2015. A set of Information Booklets and an SEA scoping report were made available as part of this process. Subsequent to this consultation exercise, a number of submissions were received informing both the making of the Draft Plan and the SEA process. A total of 654 written submissions and the issues raised are summarised in the 'Report on the Initial Stage of Public Consultation to prepare a Local Area Plan in respect of Tier 2 Towns, October 2015' for consideration by Elected Members at their Municipal District workshops in November 2015.

The Council prepared the Draft Seven Strategic Towns Local Area Plan 2018-2024, Environmental Report and Natura Impact Report in November 2017 and these were made available during the primary public consultation process that took place from the 24<sup>th</sup> November 2017 to 24<sup>th</sup> January 2018. A total of 1152 submissions and observations were received during this process as follows per town: An Clochán Liath (Dungloe):25; Ballybofey-Stranorlar: 33; Ballyshannon: 35; Bridgend: 84; Carndonagh: 22; Donegal Town: 31 and Killybegs: 838.

The submissions to the Draft SSTLAP, Environmental Report and Natural Impact Report were considered and changes were proposed that included non-material and material alterations to the Draft SSTLAP. 118 Material Alterations were published with an accompanying SEA Environmental Report Addendum and Natura Impact Report Addendum. All documents were made available during the final public consultation period on the proposed Material Alterations that took place from the 11<sup>th</sup> May 2018 to 7<sup>th</sup> June 2018 inclusive. The proposed Material Alterations that were published for public consultation consisted of the following three documents:

- Proposed Material Alterations to the Draft Seven Strategic Towns Local Area Plan 2018-2024, for the towns of An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs: May, 2018
- Strategic Environmental Assessment of Proposed Material Alterations to the Draft Seven Strategic Towns Local Area Plan 2018-2024, Addendum to Environmental Report: May, 2018
- Addendum to Appropriate Assessment (AA); Natura Impact Report of Proposed Material Alterations to the Draft Seven Strategic Towns Local Area Plan 2018-2024: May, 2018.

A total of 294 no. submissions or observations were received on the published Material Alterations; 285 from the public and 8 from Statutory Consultees. A report on the submissions and observations made in respect of the proposed Material Alterations accompanying Environmental Report and Natural Impact Report was presented in a Chief Executive's Report to the Members of Donegal County Council in July 2018.

The Members resolved to make the Seven Strategic Towns Local Area Plan 2018-2024 having considered the Chief Executive's Report dated 4<sup>th</sup> July 2018 in relation to the 118 Proposed Material Alterations and having:-

1. Completed the Strategic Environmental Assessment process taking account of the information contained within, inter alia:
  - (i) The Environmental Report (November 2017) of the Draft Plan and;
  - (ii) The addendum Environmental Report relating to the Proposed Material Alterations (May 2018); and
  - (iii) Observations received there on.
2. Completed the Appropriate Assessment process taking account of the information contained within, inter alia:
  - (i) The Natura Impact Report (November 2017) of the Draft Plan and;
  - (ii) The addendum Natura Impact Report relating to the Proposed Material Alterations (May 2018); and
  - (iii) Observations received thereon.

## 2.5 Appropriate Assessment

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

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

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

An Appropriate Assessment was undertaken in tandem with the SEA process to assess whether the Seven Strategic Towns Local Area Plan 2018-2024, individually or in combination with other plans or projects, would be likely to have significant adverse effect on a designated Natura 2000 site (comprising Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)). The AA process concluded a finding of No Significant Effects as a result of implementation of the SSTLAP having been mitigated against through the iterative development of the Plan's policies and objectives, and those of the County Donegal Development Plan 2018-2024.

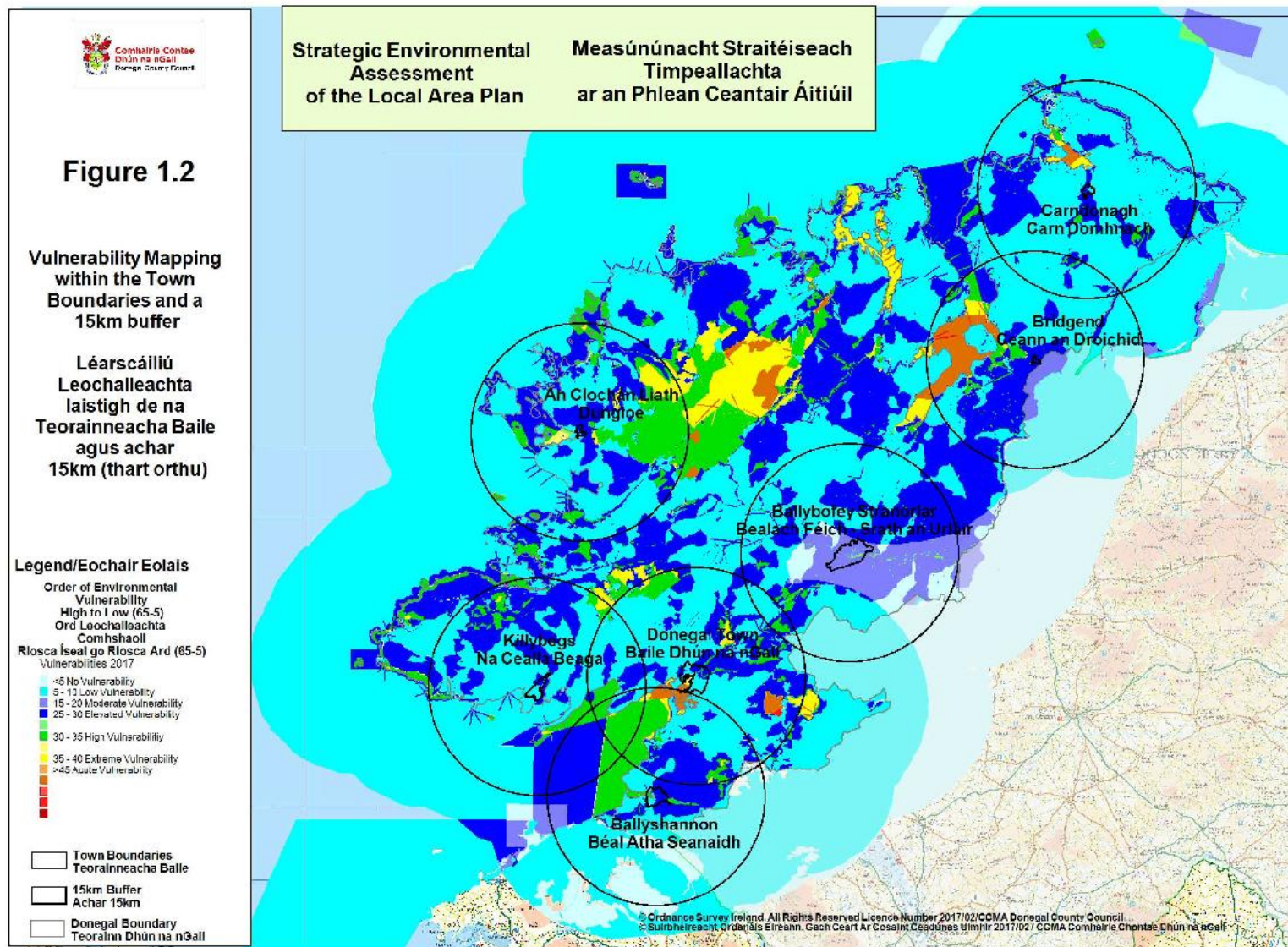
## 2.6 Environmental Pressures and Vulnerabilities

Environmental considerations were integrated into the Draft SSTLAP before it was placed on public display for the first time. The Environmental vulnerabilities and pressures were identified in the Current state of the Environment, section of the Environmental Report through other existing data including associated spatial digital data, the Strategic Flood Risk Assessment (SFRA) for each town, and with reference to other pressures detailed in Table 2.3 below.

### 2.6.1 Spatial Evidenced-Based Consideration of Environmental Vulnerabilities

The spatial data was compiled and mapped identifying both the locations and extent of specific areas in the Seven Strategic Towns that are most sensitive to development and that would be most likely to suffer adverse effects if growth was to be accommodated in those areas without mitigation, (Figure 1.1 below refers). A range of potential alternative scenarios for the types of planning strategies adopted for the SSTLAP were identified in the SEA process and evaluated for their likely significant environmental effects (see Section 4 of the Environmental Report, November 2017). The environmental sensitivities and overlay mapping shown on Figure 1.1 were used in order to predict and evaluate the environmental effects of implementing the scenarios. Communication of the findings of this evaluation helped the Plan-making team to make an informed choice as to which alternative was to be put before the Elected Members as the proposed Local Area Plan. Mitigation measures which arose from the evaluation and which were integrated into the Plan are detailed under Section 3.4 of this report.

Figure 1.1: Vulnerability Mapping within the Seven Strategic Town Boundaries and a 15km buffer



## 2.6.2 Flood Risk

A Stage 2, Strategic Flood Risk Assessment (SFRA) was prepared as part of the LAP process, covering each of the seven towns comprising of, inter alia, mapping in respect of flood extents (Flood Zones A and B) for each town and, where, necessary, site –specific Justification Tests. The SFRA informed land use zonings and flood risk management for each of the seven towns.

The CDP 2018-2024 contains the strategic planning framework and detailed objectives and policy measures relating to potential flood risk and these shall apply to all development proposals within the seven LAP towns.

The CDP adopts a policy framework for managing flood risk based on; assessing new development proposals in accordance with the sequential and precautionary approaches identified in the Flood Risk Management Guidelines, and requiring, as appropriate, the submission of Flood Risk Assessments and justification tests as detailed in said guidelines. It also recognises that there may be other flood risk locations not identified in the SFRA Flood Hazard mapping and provides for the utilisation of other available datasets in the management of flood risk in such circumstances. (e.g. The Historic flood maps available on [www.floodmaps.ie](http://www.floodmaps.ie), the OPW’s Coastal Protection Strategy Study Mapping).

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

Overall, it is considered that the incorporation of the Strategic Flood Risk Assessment findings into the LAP, together with the application of the flood-related policies and objectives of the CDP 2018-2024, will reduce the adverse consequences of flooding on human health, the environment and heritage by:

- Implementing the precautionary principle and sequential approach detailed in the publication ‘The Planning System and Flood Risk Management - Guidelines for Planning Authorities’ (DoEHLG 2009 including; avoiding development in flood risk areas, substituting less vulnerable for more vulnerable developments, justifying new development at strategic locations where avoidance and substitution are not possible and mitigating the impact of flooding through the design and layout of new developments.
- Basing zoning designations and future decision making for new development and infrastructure on evidence based assessments in the form of the Stage 2 Flood Risk Assessment.

## 2.6.3 Identification of Environmental Pressures

In addition to consideration of baseline evidence referenced above, environmental pressures within each of the Seven Strategic Towns were identified in the context of each topic of environmental consideration and Table 2.3 below presents such environmental issues and pressures, however this is not exhaustive.

**Table 2.3: Summary of Main Environmental Pressures within each Strategic Town**

Topic	Environmental Issue/Pressures
<b>Biodiversity, Fauna and Flora</b>	Certain developments and activities associated with agricultural activities, forestry, urban developments, tourism, commercial fishing, ports and a wide range of infrastructural works (including road works, water abstraction, wastewater disposal) that are located within or close to ecologically sensitive sites can give rise to significant environmental pressures. The protection of shellfish growing areas, freshwater pearl mussel and salmon have been highlighted as of particular importance. There are a relatively high number of Natura 2000 sites (SACs and SPAs) and Natural Heritage Sites located adjacent to or within the seven towns. These sites are particularly sensitive to certain development works and activities. Invasive non-native plant and animal species are a major threat to the biodiversity of the region.
<b>Population and Human Health</b>	Increases in population, their activities and settlement patterns have the potential to place increased pressure on biodiversity, water quality, landscape, cultural heritage

Topic	Environmental Issue/Pressures
	and air. In particular, increased pressure on water quality arising from pollution can have a significant impact on human health. Individual and cumulative changes in the quality of the natural and built environment at local, regional and national level has the potential to impact to varying degrees on human health and wellbeing. High levels of radon in buildings and road safety have also been highlighted as significant issues.
<b>Soil</b>	Certain forms of development and activities including, urban and rural development, windfarms, waste disposal, afforestation, recreation and agricultural activities can place a significant pressure in soils. Changes in precipitation arising from global warming could have significant impacts on slope stability and could impact on soil and water quality.
<b>Water</b>	Development and activities can often impact on water quality including groundwater, drinking water and bathing water. Urban and rural development including wastewater and surface water disposal, landfills, quarries, contaminated lands, illegal dumping, agricultural activity, water recreational activities and afforestation can have significant impacts on water quality. Excessive inputs of nutrients, namely phosphorous and nitrogen present one of the most significant risks to water quality.
<b>Air and Noise</b>	Currently no significant impacts have been identified in respect to air quality or noise levels. Impacts arising from air pollution are primarily associated with transport and industrial emissions.
<b>Coast/Marine resource</b>	<p>Inappropriate development near /on the coast</p> <p>Dynamic needs of the coast (coastal squeeze)</p> <p>Flood risk and coastal defences</p> <p>Tourism impacts and sustainable management e.g. Sensitive dune systems and beach access points</p> <p>Litter disposal and public services (e.g. toilets)</p> <p>Activities in the water</p> <p>Coastal /Marine spatial planning</p>
<b>Climatic factors</b>	Increased greenhouse gas emissions have been linked with climate change resulting in increases in the intensity and frequency of flooding.
<b>Renewable energy</b>	<p>Onshore and offshore opportunities and implications</p> <p>Onshore – scenic amenity access roads loss of biodiversity</p> <p>Offshore – impact on birds &amp; marine mammals deployment issues grid connection locations</p>
<b>Material Assets</b>	<p>Material assets include a wide range of natural and man made assets.</p> <p>These can include infrastructural services and facilities and other items such as cultural heritage, agricultural lands and coastal and water resources. Developments and activities can often impact on these assets, some of which have been referred to herein. It has been highlighted that there is a high level of residential and commercial vacancy within the towns. These properties represent an underutilized resource and if left idle, they can over time deteriorate and detract from the character of urban areas.</p>
<b>Cultural heritage, including Architectural and Archaeological</b>	Pressures can arise from certain developments and activities on or near sites of heritage value. The visual amenities and character of urban areas and items of architectural, archaeological and historical importance, including shipwrecks, may be placed under pressure by such works. It is acknowledged that development works can often have a positive impact on our cultural heritage.

Topic	Environmental Issue/Pressures
<b>Landscape</b>	Developments and activities can impact on visually sensitive areas including designated landscape and seascapes
<b>Interrelationship between the above topics</b>	Cumulative impacts and interaction of above mentioned items can give rise to increased pressure on the environment. The impacts and interactions will obviously vary in extent and nature. In particular, issues in respect to water quality, climate change and a number of environmental topic areas. Population increase and changes in peoples activities and settlement patterns can impact on a wide range of the topics mentioned above.



## 3 IDENTIFICATION AND EVALUATION OF ALTERNATIVES

### 3.1 Alternative Approaches to the Plan

The SEA Directive requires the consideration of SEA alternatives. The following two alternative approaches are considered in order to be consistent with the distribution of projected population growth of 52,807 (34% of the County allocation) across the seven towns as set out in the County Donegal Development Plan 2018-2024, as follows:

1. Business As Usual
2. Effective Sustainable Urban Growth

### 3.2 Details of the Alternative Approaches

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

#### Alternative 1: Business As Usual

This approach would involve the continuation of existing patterns of development and minimal intervention in relation to strategic planning policy described as 'Business As Usual'. 'Demand' rather than 'need' would drive development patterns.

This development pattern would weaken the capacity of towns to support economic growth and viability. There would be a risk of pressure for development at locations with insufficient servicing, both in the context of physical infrastructure such as adequate wastewater treatment and also in relation to 'soft' infrastructure such as community facilities and health services. It would increase impacts and encroachment on the natural environment. It would also reduce capacity to spatially coordinate employment and skills base/human capital.

The 'Business As Usual' approach would not respond in a prioritised manner to each town's unique development opportunities that have been identified through the LAP process.

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

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

#### Alternative 2: Effective Sustainable Urban Growth

This approach would focus on 'effective' urban growth commensurate with the size and structure of each town to guide and facilitate appropriate development.

This approach would recognise the role of each Strategic Town as it sits within the overall economic development of the County, due to either their infrastructural capacity to accommodate population growth and/or their characteristics as towns that perform special economic functions at present or have the potential to do so in the future. The appropriate development and strengthening of these towns

would facilitate the provision of vital services and facilities as well as local employment to support the surrounding rural hinterlands. The appropriate application of the population distribution of 34% of the County total, as set by the County Development Plan 2018-2024 would facilitate regeneration and renewal of these towns.

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

- Achieve maximum benefit from investment in physical, social and economic infrastructure for each town.
- Support the strengthening of the towns as drivers for economic growth in the County.
- Support activity resulting in local employment opportunities.
- Enable place-making through regeneration and renewal.
- Result in environmental benefits as development would be linked inextricably to ensuring the appropriate and adequate provision of hard infrastructure.
- Improve quality of life through positive place-making.

Having regard to the foregoing, it is considered that this alternative would be the optimum option for the strategic direction of each LAP town in the context of the wider development of the County.

### **3.3 Assessment and Selection of Alternatives**

Having regard to the principles of sustainable development and to the existing and emerging national and regional policy frameworks, Alternative 2 'Effective Sustainable Urban Growth' is the most appropriate strategic alternative for the seven Strategic Towns. In undertaking this alternative, growth will be managed so as to coordinate with programmes for investment in infrastructure and where possible to innovate in the delivery of critical infrastructure so as to result in maximum benefit from investment and to ensure that significant growth can be accommodated with appropriate and adequate servicing and no resultant negative impacts on the environment.

The particular strengths, opportunities and niche potential that exist within the different areas of the each town are to be harnessed through this approach to produce benefits and meaningful change for the communities and consequently the County.

### **3.4 Mitigation Measures and Incorporating Environmental Issues into the Draft Plan**

The Environmental Report of the Draft SSTLAP was carried out in-house within the wider Plan drafting team; as such environmental vulnerabilities, issues and constraints were considered in the first instance through the plan writing process and in this regard the Plan was formulated with the explicit intention of protecting the environment and avoiding potentially adverse environmental impacts. As such, the Plan writing process and the incorporation of environmental issues has been carried out as an iterative process. The 'Assessment' proper as outlined in Table 8.4 of the Environmental Assessment assessed each aim, objective and policy individually.

Within Table 8.4 there are objectives and policies identified as being potentially in conflict with the Strategic Environmental Objectives (SEOs) or otherwise as having an uncertain interaction with the SEOs. The assessment concludes that the potential conflicts identified can be mitigated to an acceptable level through further detailed assessment and mitigation at implementation stage through best practice in the development management process and implementation of the SSTLAP. In addition, this will be assisted and guided through the mitigation provided for in the general objectives and policies of the County Donegal Development Plan. Furthermore, certain individual applications for developments within the Plan area may be subject to individual Environmental Impact Assessments and/or Appropriate Assessments.

The mitigation measures referred to above will act to prevent, reduce and as fully as possible offset any significant effects of implementing the Seven Strategic Towns Local Area Plan 2018-2024.

### 3.5 INCORPORATING ENVIRONMENTAL ISSUES INTO THE PLAN

The SEA process shaped the drafting of the entire Plan; Strategic Environmental Objectives were drafted following the collation of the baseline data and are based on the particular environmental issues affecting the seven towns whilst also complying with the requirements of Schedule 2(B) of the Planning and Development Regulations 2001 (as amended), and the SEA Guidelines<sup>3</sup>, 2004. An assessment of each Strategic Objective, Objective and Policy of the Draft SSTLAP was carried out to ascertain whether or not they could potentially impact on the Strategic Environmental Objectives (table 8.4 contained within the Environment Report) by testing them against the categories as set out in Table 3.1 below:

**Table 3.1: Strategic Environmental Objectives**

Environmental Component	SEO code:	Strategic Environmental Objective
<b>Biodiversity, Fauna and Flora</b>	BIO1	Ensure compliance with the Habitats Directive by protecting all Natura 2000 sites and habitats of species (SACs and SPAs) within the Plan area, including Freshwater Pearl Mussel catchment areas.
<b>Biodiversity, Fauna and Flora</b>	BIO2	Conserve and enhance the diversity of habitats and protected species and promote the sustainable management of these areas.
<b>Biodiversity, Fauna and Flora</b>	BIO3	Protect the marine environment, and promote integrated coastal zone management strategies.
<b>Biodiversity, Fauna and Flora</b>	BIO4	Protect macro-corridors and contiguous areas of habitat.
<b>Population</b>	POP1	Facilitate a good quality of life based on high-quality residential, working and recreational environments.
<b>Population</b>	POP2	Facilitate more sustainable travel patterns.
<b>Human Health</b>	HH1	Minimise noise, vibration and emissions from traffic, industrial processes and extractive industry.
<b>Soil (Including Minerals)</b>	SL1	Protect and maintain the quality of soils.
<b>Soil (Including Minerals)</b>	SL2	Protect and conserve geological sites.
<b>Soil (Including Minerals)</b>	SL3	Give preference to the re-use of brownfield lands, rather than developing greenfield lands.
<b>Soil (Including Minerals)</b>	SL4	Minimise the amount of waste to landfill
<b>Water</b>	WR1	Protect and enhance the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems, in accordance with the relevant River Basin Management Plan.
<b>Water</b>	WR2	Protect the quality of surface and drinking water quality as sources of drinking water, assets for amenity, and recreation and ecosystem purposes.
<b>Water</b>	WR3	Promote sustainable water use based on a long-term protection of available water resources.
<b>Water</b>	WR4	Reduce progressively discharges of polluting substances to waters.
<b>Water</b>	WR5	Manage the risk of coastal, estuarine and fluvial flooding. Manage the risk of droughts.
<b>Coast/Marine Resource</b>	CM1	Avoid coastal erosion and promote coastal protection. Manage the coastal zone as an environmental and tourist resource.
<b>Coast/Marine Resource</b>	CM2	Protect Designated Shellfish Waters.
<b>Air/Climatic Factors</b>	AC1	Support implementation of National climate change targets, objectives and policies.
<b>Air/Climatic Factors</b>	AC2	Reduce all forms of air pollution

<sup>3</sup> Implementation of SEA Directive (2001/42/EC): Assessment of the Effects of Certain Plans and Programme on the Environment - Guidelines for Regional Authorities and Planning Authorities (November, 2004).

Environmental Component	SEO code:	Strategic Environmental Objective
<b>Air/Climatic Factors</b>	AC3	Promote and support a shift from fossil fuel dependent energy to more sustainable energy. Promote and support a shift from fossil fuel dependant vehicles to more sustainable modes of travel.
<b>Material Assets</b>	MA1	Maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources.
<b>Material Assets</b>	MA2	Avoid flood risk and/or coastal erosion in selecting sites for development
<b>Cultural Heritage</b>	CH1	Promote the protection and conservation of the cultural, including architectural and archaeological, heritage
<b>Landscape</b>	LD1	Conserve and enhance valued natural, historic and cultural landscapes and features within them and avoid adverse impacts.

**Table 3.2: Categories for Assessment**

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

The Assessment identified that no deletions/amendments were required concluding that all environmental issues were adequately addressed within the SSTLAP through the SEA and AA process.

## **4 MONITORING**

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

The SEA Directive requires that the significant environmental effects of the implementation of plans and programmes are monitored. This section and Section 9 of the Environmental Report contain proposals for monitoring the likely significant effects of implementing the SSTLAP. Monitoring enables, at an early stage, the identification of unforeseen adverse effects and the undertaking of appropriate remedial action.

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

Monitoring is based around the indicators which were chosen earlier in the process. These indicators allow quantitative measures of trends and progress over time relating to the Strategic Environmental Objectives used in the evaluation. Focus will be given to indicators which are relevant to the likely significant environmental effects of implementing the SSTLAP and existing monitoring arrangements will be used in order to monitor the selected indicators. Each indicator to be monitored will be accompanied by the relevant target(s) which were identified with regard to the relevant legislation. Table 8.1 of the Environmental Report shows the indicators and targets which have been selected with regard to the monitoring of the Plan.

### **4.2 Sources of Monitoring Information**

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