

Mr Paul Christy
Senior Executive Planner
Central Planning Unit
Directorate of Community, Development and Planning Services
Donegal County Council

20th March 2021

Our Ref: SCP210202.1

Re. Proposed Variation No. 1 to the Donegal Development Plan 2018-2024 (TEN-T Priority Routes Project) and SEA Environmental Report

Dear Mr Christy,

We acknowledge your notice, dated 18th February 2021, in relation to the Proposed Variation No. 1 to the Donegal Development Plan 2018-2024 -TEN-T Priority Routes Project- (the ‘Variation’) and SEA Environmental Report.

The EPA is one of the 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 the 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, in finalising and implementing the Variation.

Donegal County Council should 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.

Ireland's Environment - Key Actions

Our recently published State of Environment Report *Ireland's Environment - An Assessment 2020* (EPA, 2020) identifies thirteen Key Messages for Ireland which align with many of the UN Sustainable Development Goals (SDGs). Delivering Ireland's long-term sustainable development and environmental protection goals will require a concerted effort by government departments to address these key actions:

1. *National Policy Position for Ireland's Environment* - Recognition of the need for an integrated policy position given the many interlinkages and dependencies.
2. *Full Implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies*
3. Promote the benefits of a clean environment for health and wellbeing
4. Systematic change is needed for Ireland to become climate neutral and a climate resilient society and economy.
5. WHO clean air quality guideline values to be adopted within the Clear Air Strategy as specific targets to achieve.
6. Safeguard nature and wild places as a national priority to preserve its legacy for future generations
7. Improve the water environment and tackle water pollution water quality locally at a water catchment level.
8. Reduce human induced pressures on the marine environment
9. Move away rapidly from extensive use of fossil fuels to the use of clean energy systems
10. An agriculture-food sector that demonstrates validated performance around producing food with a low environmental footprint.
11. Drinking water and wastewater infrastructure must meet the needs of our society
12. Move to a less wasteful and circular economy where the priority is waste prevention, reuse, repair and recycle.
13. Promote integrated land mapping approaches to support decision making on sustainable land use.

The relevant aspects of these Key Actions and the Sustainable Development Goals (SDGs) should be taken into account in preparing the Variation and SEA and should be reflected in the principles/objectives/measures in the Variation. This will ensure that the Variation aligns with and contributes to achieving Ireland's sustainable development and environmental protection ambitions.

Specific Comments on the Variation



In finalising and implementing the Variation, Donegal County Council should consider and provide details on the following:

- A description of the alternatives considered and how the assessment of these has led to the selection and justification of the preferred alternative route(s). Where relevant, the alternatives should be assessed against the 'Strategic Environmental Objectives' identified in the SEA ER.
- Confirmation of the status of the routes in the context of EIA and Appropriate Assessment. Recommendations and mitigation measures from both these processes should, where relevant, be reflected in the proposed variation and the SEA Environmental Report. In addition, consideration should be given to the potential for adverse impact on water bodies, including fisheries, within and adjoining the route corridors. In the event that deterioration on water quality is predicted, details should be provided of the proposed site-specific measures to mitigate the potential adverse impact on the status of the relevant water body(ies).
- Outputs from the Environmental Sensitivity Mapping Tool which is available at www.enviromap.ie. This tool brings together over 100 datasets and allows users to create plan-specific environmental sensitivity maps. These maps can help in the examination of environmental considerations, anticipate potential land-use and environmental protection conflicts, and help identify suitable development locations while also protecting the environment.
- An assessment of the exposure and vulnerability of the proposed route alignments to extreme weather and climate events, and the range of projected scenarios and changes to these, due to climate change. Consideration should also be given to other related impacts in addition to flooding including more extreme temperatures, soil erosion/landslides, coastal erosion, etc. which have potential to impact on transport systems.
- An assessment of the relevant local authority noise maps, including the Draft Donegal Noise Action Plan 2018-23.
- Inclusion of a section/ table outlining the specific policies and objectives of the County Donegal Development Plan 2018-2024 that are intended to mitigate the potential for the likely significant/unknown effects identified in the Variation.
- There is merit in including relevant mapping relating to the proposed Priority Routes, as well as *Table 10.1 Environmental Protection Objectives, Indicators and Targets*, in the Non-Technical Summary.

Monitoring



- Ensure the Monitoring Programme is flexible to take account of specific environmental issues and unforeseen adverse impacts should they arise. Monitoring should also consider and deal with the possibility of cumulative effects, while both positive and negative effects should be considered.
- In the event that monitoring identifies adverse impacts during the implementation of the Variation, Donegal County Council should ensure that suitable and effective remedial action is taken.
- Implementation, monitoring and reporting of the Variation should be aligned with the environmental monitoring required under the SEA legislation, and as set out in the SEA Environmental Report.
- Guidance on SEA-related monitoring is available on the EPA website at <https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html>

Future Amendments to the Plan

You should screen any future amendments to the for likely significant effects, using the same method of assessment applied in the “environmental assessment” of the Plan.

SEA Statement – “Information on the Decision”

Once the Variation is adopted, you should prepare an SEA Statement that summarises:

- How environmental considerations have been integrated into the Variation;
- How the Environmental Report, submissions, observations and consultations have been taken into account during the preparation of the Variation;
- The reasons for choosing the Variation adopted in the light of other reasonable alternatives dealt with; and,
- The measures decided upon to monitor the significant environmental effects of implementation of the Variation.

You should send a copy of the SEA Statement with the above information to any environmental authority consulted during the SEA process.

Guidance on preparing SEA Statements is available on the EPA website at the following link: <https://www.epa.ie/pubs/advice/ea/guidanceonseastatementsandmonitoring.html>

Environmental Authorities

Under the SEA Regulations, you should consult with:

- Environmental Protection Agency
- Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (formerly Minister for Culture, Heritage and the Gaeltacht (functions transferred from Minister for Environment, Heritage and Local Government/ Minister for Housing, Planning and



Local Government to Minister for Culture, Heritage and the Gaeltacht by S.I. 192 of 2011);

- Minister for Environment, Climate and Communications (formerly Minister of Communications, Climate Change and the Environment);
- Minister for Agriculture, Food and the Marine; 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.

Yours Sincerely,

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

David Galvin
SEA Section
Office of Evidence and Assessment