

Strategic Environmental Assessment of Proposed Material Alterations to the Draft Seven Strategic Towns Local Area Plans 2018-2024

Addendum to Environmental Report

**In accordance with the requirements of the Planning and
Development (Strategic Environmental Assessment)
Regulations 2004 (as amended)**



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

May 2018

TABLE OF CONTENTS

1 Introduction..... 1
1.1 BACKGROUND..... 1
1.2 LEGISLATIVE CONTEXT..... 1
1.3 THE PROCESS OF STRATEGIC ENVIRONMENTAL ASSESSMENT 2
2 Strategic Environmental Assessment of Proposed Material Alterations 5
3 Conclusion 7

LIST OF TABLES

Table 1.1: Steps in the SEA Process2
Table 1.2: Categories for Assessment.....2
Table 1.3: Strategic Environmental Objectives3
Table 2.1: Assessment of Material Alterations identified as requiring an SEA through the Screening Report'.....6

LIST OF APPENDICES

- Appendix A:** Amendments to Housing Land Supply arising from Proposed Material Alterations
- Appendix B:** Amendments to Flooding arising from Strategic Flood Risk Assessment
- Appendix C:** Amendments to Housing Land Supply in Carndonagh arising from Proposed Material Alterations
- Appendix D:** Maps of Proposed Material Alterations to the Draft Seven Strategic Towns Local Area Plan 2018-2024

1 Introduction

1.1 Background

Donegal County Council is preparing the Draft Seven Strategic Towns Local Area Plan 2018-2024 (hereinafter referred to as the Draft LAP) for the towns of An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Ballyshannon, Bridgend, Carndonagh, Donegal Town and Killybegs. The Draft LAP is being prepared under the provisions of the Planning and Development Act 2000 (as amended) to provide for sustainable development and improvement of the environmental, social, economic and cultural assets of the seven towns.

Strategic Environmental Assessment (SEA) is a systematic and effective process for ensuring that environmental issues are taken into account at every stage in the preparation, implementation, monitoring and review of plans, programmes and strategies. This document comprises the SEA of the proposed Material Alterations to the Draft LAP in accordance with the requirements of the Planning and Development Act 2000 (as amended), Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended by SI No. 201 of 2011). This document is an Addendum to the Environmental Report of the Draft LAP and should be read in conjunction with the Environmental Report as well as the Draft LAP, the Stage 2 AA Natura Impact Report (NIR), the Addendum to the NIR and the proposed Material Alterations.

As part of the SEA process a Screening Report was prepared in April 2018 to determine whether any one or more of the proposed Material Alterations (118 no.) could be likely to have significant effects on the environment as a result of implementation of the Draft LAP in accordance with Schedule A of the SEA Regulations (as amended). The Screening exercise concluded that 94 no. of the proposed Material Alterations would be likely to effect the environment, either individually or cumulatively. It is therefore necessary to carry out an SEA in regards to the 94 no. proposed Material Alterations

The Environmental Report sets out how the SEA was carried out for the review of the Draft LAP, and includes a description of the current environment along with an assessment of the effects of implementing the policies and objectives of the Draft LAP, necessary changes and considerations and mitigation and monitoring proposals going forward. This Addendum to the Environmental Report outlines the assessment of the proposed Material Alterations to the Draft LAP and identifies mitigation and monitoring proposals for ? of the proposed 118 no. Material Alterations.

Similarly, an Appropriate Assessment (AA) of the proposed Material Alterations has been undertaken in tandem to determine whether any one or more of the proposed Material Alterations could have significant effects on the Natura 2000 network of European sites (commonly known as Natura 2000 sites) within the zone of influence of the Plan (within the County or within 15km of the Plan area), either alone or in combination with other plans or projects, and consider whether these impacts are likely to be significant in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/443/EEC). The AA is contained in an Addendum to the Natura Impact Report, and the conclusions and recommendations arising from the Natura Impact report have been incorporated into this SEA process.

1.2 Legislative Context

The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004) (as amended by SI No. 201 of 2011) transpose the European Strategic Environmental Assessment (SEA) Directive 2001/42/EC into Irish Law. The former Department of the Environment Heritage and Local Government 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'.

A Strategic Environmental Assessment (SEA) of the Draft LAP is a mandatory requirement pursuant to Article 14B of the aforementioned SEA Regulations, and has been drafted pursuant to the SEA Regulations and in accordance with the SEA Guidelines. The SEA guidelines outline the SEA process and set out the following requisite steps as outlined in Table 1.1.

Table 1.1: Steps in the SEA Process

Scoping: Consultation with Statutory bodies and other interested parties on the scope and level of detail to be considered in the assessment	Completed
Preparation of Environmental Report: An assessment of the likely significant impacts on the environment as a result of the Plan.	Completed
Consultation on the Draft County Donegal Development Plan and associated Environmental Report and Appropriate Assessment.	Completed
Evaluation of submissions and observations made on the Draft County Donegal Development Plan, Environmental Report and Appropriate Assessment.	Completed
Considerations of Managers Report on submissions and observations made on the Draft County Donegal Development Plan, Environmental Report and Appropriate Assessment and considered at an adjourned Council meeting on 13 th December 2017.	Completed
Publication of proposed Material Alterations to Draft County Development Plan and associated Strategic Environmental Assessment and Appropriate Assessment.	Current Stage
Preparation of an SEA Statement identifying how environmental considerations and consultation have been integrated into the Adopted County Development Plan.	To be Completed

1.3 The Process of Strategic Environmental Assessment

The Strategic Environmental Assessment of the proposed Material Alterations shall follow the same assessment process as set out in Section 8.2 and Table 8.4 of the Environmental Report for reasons of clarity and consistency. Each material alteration to an objective, policy, text change and mapping change shall be examined and an assessment shall be made as to whether or not the proposed alteration shall have an effect (as set out in Table 1.2 below) on each Strategic Environmental Objective, as set out in Table 1.3 below.

Table 1.2: Categories for Assessment

Probable Conflict with status of SEOs-unlikely to be mitigated to an *acceptable level	Potential Conflict with status of SEOs – likely to be mitigated to an *acceptable level	Uncertain interaction with status of SEOs	Neutral interaction with status of SEOs	No Likely interaction with status of SEOs	Likely to Improve the status of the SEOs
---	--	---	--	--	---

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

Table 1.3: Strategic Environmental Objectives

Environmental Component	SEO code:	Strategic Environmental Objective
Biodiversity, Fauna and Flora	BIO1	Ensure compliance with the Habitats Directive by protecting all Natura 2000 sites and habitats of species (SACs and SPAs) within the Plan area, including Freshwater Pearl Mussel catchment areas.
Biodiversity, Fauna and Flora	BIO2	Conserve and enhance the diversity of habitats and protected species and promote the sustainable management of these areas.
Biodiversity, Fauna and Flora	BIO3	Protect the marine environment, and promote integrated coastal zone management strategies.
Biodiversity, Fauna and Flora	BIO4	Protect macro-corridors and contiguous areas of habitat.
Population	POP1	Facilitate a good quality of life based on high-quality residential, working and recreational environments.
Population	POP2	Facilitate more sustainable travel patterns.
Human Health	HH1	Minimise noise, vibration and emissions from traffic, industrial processes and extractive industry.
Soil (Including Minerals)	SL1	Protect and maintain the quality of soils.
Soil (Including Minerals)	SL2	Protect and conserve geological sites.
Soil (Including Minerals)	SL3	Give preference to the re-use of brownfield lands, rather than developing greenfield lands.
Soil (Including Minerals)	SL4	Minimise the amount of waste to landfill
Water	WR1	Protect and enhance the status of aquatic ecosystems and, with regard to their water needs, terrestrial ecosystems and wetlands directly depending on the aquatic ecosystems, in accordance with the relevant River Basin Management Plan.
Water	WR2	Protect the quality of surface and drinking water quality as sources of drinking water, assets for amenity, and recreation and ecosystem purposes.
Water	WR3	Promote sustainable water use based on a long-term protection of available water resources.
Water	WR4	Reduce progressively discharges of polluting substances to waters.
Water	WR5	Manage the risk of coastal, estuarine and fluvial flooding. Manage the risk of droughts.
Coast/Marine Resource	CM1	Avoid coastal erosion and promote coastal protection. Manage the coastal zone as an environmental and tourist resource.
Coast/Marine Resource	CM2	Protect Designated Shellfish Waters.
Air/Climatic Factors	AC1	Support implementation of National climate change targets, objectives and policies.
Air/Climatic Factors	AC2	Reduce all forms of air pollution
Air/Climatic Factors	AC3	Promote and support a shift from fossil fuel dependent energy to more sustainable energy. Promote and support a shift from fossil fuel dependant vehicles to more sustainable modes of travel.

Material Assets	MA1	Maintain and improve the availability and quality of community related infrastructure, services and facilities and ensure the prudent management of environmental resources.
Material Assets	MA2	Avoid flood risk and/or coastal erosion in selecting sites for development
Cultural Heritage	CH1	Promote the protection and conservation of the cultural, including architectural and archaeological, heritage
Landscape	LD1	Conserve and enhance valued natural, historic and cultural landscapes and features within them and avoid adverse impacts.

2 Strategic Environmental Assessment of Proposed Material Alterations

The Strategic Environmental Assessment of 94 no. of the proposed 118 no. Material Alterations to the Draft LAP arising since the issue of the Chief Executives Report on 23rd February 2018 and the Addendum to the Chief Executives Report on 21st March 2018 are set out in Table 2.1 below. The Strategic Environmental Assessment Screening Report of the proposed Material Alterations to the Draft LAP identified 94 no. of the 118 no. proposed Material Alterations as likely to effect the environment and therefore an SEA was necessary. Where a potential conflict with the status of Strategic Environmental Objectives is found to be likely, proposed mitigation is set out in a row below each assessment.

Of the 94 no. proposed Material Alterations to the Draft LAP identified as requiring an SEA, all of these Material Alterations tested had Potential Conflict with the status of the SEOs but were likely to be mitigated to an acceptable level through other objectives and policies contained within the Draft Plan.

Table 2.1: Assessment of Material Alterations identified as requiring an SEA through the Screening Report'

TBC

3 Conclusion

This document comprises the SEA of the proposed Material Alterations to the Draft Seven Strategic Towns Local Area Plan 2018–2024 (the Draft LAP) and comprises an Addendum to the Environmental Report of the Draft Seven Strategic Towns Local Area Plan 2018–2024' and should be read in conjunction with the Environmental Report as well as the Draft LAP, the Stage 2 AA Natura Impact Report (NIR), the Addendum to the NIR and the proposed Material Alterations.

The Screening Report prepared in April 2018 concluded that 94 no. of the 118 no. proposed Material Alterations would be likely to effect the environment as a result of implementation of the Draft LAP in accordance with Schedule A of the SEA Regulations (as amended). These 94 no. proposed Material Alterations have been subjected to SEA as a result of the earlier screening exercise.

Taking into account the measures which have been already integrated into the Draft Plan which provide for and contribute towards environmental protection, environmental management and sustainable development, it is determined that all potential effects arising from the proposed Material Alterations either are present already and will not change or will be mitigated so as not to be significant; none of the Material Alterations had a probable conflict with the status of any of the SEOs, where it was unlikely that the proposed Material Alterations could be mitigated to an acceptable level. All XXX no. proposed Material Alterations identified a potential conflict with the status of SEOs however it is considered that all of these could be mitigated to an acceptable level through existing objectives and policies contained within the Draft LAP, and these are identified in Table 2.1: Assessment of Material Alterations identified as requiring an SEA through the Screening Report' contained within this report. XX no. of the proposed Material Alterations were identified as having uncertain interaction with the status of SEOs, XX no. as having neutral, XX no. as having no likely interaction and XX no. as being likely to improve

The proposed amendments contained within the document entitled 'Proposed Material Alterations to the Draft Local Area Plan 2018-2024 (May 2018)', along with this Strategic Environmental Assessment and the Appropriate Assessment of the proposed Material Alterations shall be made available for public consultation during a 4 week period from 11th May 2018 to 7th June 2018 (inclusive).

APPENDIX A

Amendments to Housing Land Supply arising from Proposed Material Alterations

APPENDIX B

Amendments to Flooding arising from Strategic Flood Risk Assessment

Text associated with Ref. GENMA3(1), GENMA3(2), GENMA3(3), GENMA3(4), GENMA3(5), GENMA3(6), GENMA3(7) and GENMA3(8)

Proposed Material Alteration Ref. GENMA3(1):

To amend the LAP so as to incorporate the outputs of the Stage 2 Strategic Flood Risk Assessment as follows:

- (i) To amend chapter 3, section 3.6.1, page 18 and 19 so that it reads as follows:

'Flood events are a natural phenomenon which can never be entirely prevented. However, the planning system can play a key role in managing flood risk by ensuring that vulnerable developments are not located in areas prone to flooding and further ensuring that developments do not reduce the natural storage capacity of flood plains or significantly increase surface water runoff rates above natural rates.

In 2007 the EU Floods Directive (2007/60/EC) became operational. This directive aimed to reduce the adverse consequences of flooding on human health, the environment, cultural heritage and economic activity. The directive required Member States to map the flood extent and assets and humans at risk in these areas and to take adequate and coordinated measures to reduce this risk. Subsequent to this the following were published and these inform the policy for flood risk assessment in Ireland.

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

The Office of Public Works (OPW) has been designated as the lead agency for flood risk management in Ireland and the competent authority for the implementation of the Floods Directive. Commencing in 2011 the OPW is undertaking a National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme which aims to: identify and map existing flood hazard and flood risk in certain Areas for Further Assessment (AFA), set out viable options for the effective and sustainable management of flood risk in said AFAs, and prepare Flood Risk Management Plans (FRMP's) including strategies and actions for the cost effective and sustainable management of existing and future flood risk in the AFAs.

To inform the preparation of this LAP, the Planning Authority has undertaken a review of the available flood risk information in order to identify any flooding or surface water management issues through the best available data from the aforementioned Office of Public Works (OPW) Catchment Flood Risk Assessment and Management (CFRAM) Studies and the accompanying Draft Final Flood Hazard and Risk Maps prepared a Stage 2, Strategic Flood Risk Assessment in accordance with the Planning System and Flood Risk Management-Guidelines¹. The SFRA covers each of the seven towns and is a background document to the LAP. The SFRA resulted in the preparation of mapping in respect of flood extents (Flood zones A and B) and these are inserted at the relevant section of the LAP on each town. The flood zone mapping generated by the SFRA CFRAMS Studies has assisted in the application of the sequential approach to zoning as advocated in the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), and where necessary the Justification Test, to appraise sites for suitable land zonings and identify how flood risk can be managed as part of the LAP. In addition to the flood

¹ **DISCLAIMER** This LAP has been prepared in compliance with the Planning System and Flood Risk Management Guidelines. It should be noted however, that the content of the LAP in relation to flooding has been based on the best available data at the time of preparation, which may be subject to change based on more up to date and relevant flood risk information becoming available during the lifetime of the Local Area Plan. All information in relation to flood risk is provided for general policy guidance only. All landowners and developers are instructed that Donegal County Council can accept no responsibility for losses or damages arising due to assessments of the vulnerability to flooding of lands, uses and developments. Furthermore owners, users and developers are advised to take all reasonable measures to assess the vulnerability to flooding of lands in which they have an interest prior to making planning or development decisions. For further information on the status of OPW flood mapping, refer to www.cfram.ie.

risk management policies set out under Appendix 1, additional flood risk management policies to address issues that are specific to Carndonagh are set out in Chapter 8 of this LAP.

The Draft CDP contains the strategic planning framework and detailed objectives and policy measures in terms of addressing potential flood risk and these objectives and policies shall apply to development proposals within the seven LAP towns. For ease of reference therefore, the flooding objectives and policies of the Draft CDP have been restated in Appendix 1 of this LAP.

~~Of the seven towns covered by this LAP, 5 are identified as AFA's (An Clochán Liath (Dungloe), Ballybofey-Stranorlar, Carndonagh, Donegal Town and Killybegs) within the CFRAM programme and the relevant mapping in relation to each is contained in the relevant town chapter. In addition to the flood risk management policies set out under Appendix 1, additional flood risk management policies to address issues that are specific to Carndonagh are set out in Chapter 8 of this LAP.~~

~~It should be noted that the CFRAM mapping used to define the flood zones for this LAP are at Draft Final stage and may be subject to change. However the CFRAM mapping is the most comprehensive flood zone mapping available for the county and is considered appropriate for use as a strategic overview of flood risk within the county. Further information on the CFRAM studies is available at www.cfram.ie. The flood maps are 'predictive' flood maps, as they provide predicted flood extents and other information for a flood event that has an estimated probability of occurrence, rather than information on floods that have occurred in the past.'~~

- (ii) Replace all CFRAM mapping with the Flood Zone mapping contained within the Stage 2 Strategic Flood Risk Assessment.

Proposed Material Alteration Ref. GENMA3 (2):

- (iii) Amend section 4.7.1, page 31 under the header 'Flooding' in respect of An Clochán Liath so that it reads as follows:

'Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

The aforementioned LAP Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment CFRAMS study](#) as the best available evidence regarding flood risk in each area. Similarly, the Authority will have due regard to the CFRAMS An Clochán Liath (Dungloe) Fluvial Flood Extents mapping [arising from the SFRA](#) where necessary in the assessment of planning applications during the life of this LAP. The [flood extents](#) mapping for An Clochán Liath (Dungloe) is re-produced below for ease of reference'.

Proposed Material Alteration Ref. GENMA3 (3):

- (iv) Amend section 5.7.1, page 52 under the header 'Flooding' in respect of Ballybofey-Stranorlar so that it reads as follows:

'Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the

Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment](#) CFRAMS study as the best available evidence regarding flood risk in each area. ~~In this regard, Ballybofey-Stranorlar is identified as an Area of Further Assessment (AFA) in the CFRAMS study. Figures 5.3, 5.4, 5.5 and 5.6 sourced from OPW CFRAMS study show the probability of fluvial flood extents within the town centre in Ballybofey/Stranorlar and further mapping for the outer areas of the towns can be viewed at www.maps.opw.ie/floodplans.~~ Similarly, the Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Ballybofey-Stranorlar is re-produced below for ease of reference’.

As an informative, an additional map is also provided below identifying the extent of the flood embankments in the centre of Ballybofey.

Proposed Material Alteration Ref. GENMA3 (4):

- (v) Amend section 6.7.1, page 77 and 78 under the header ‘Flooding’ in respect of Ballyshannon so that it reads as follows:

‘Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

The aforementioned LAP Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment](#) CFRAMS study as the best available evidence regarding flood risk in each area. ~~In this regard, Ballyshannon was not identified as an Area of Further Assessment (AFA) in the CFRAMS study. Notwithstanding, proposals for development in Ballyshannon will be required to demonstrate compliance with the flood risk assessment and management objectives and policies set out in the Draft CDP (Appendix A refers).~~ Similarly, the Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Ballyshannon is re-produced below for ease of reference’.

Proposed Material Alteration Ref. GENMA3 (5):

- (vi) Amend section 7.7.1, page 96 under the header ‘Flooding’ in respect of Bridgend so that it reads as follows:

‘Flooding

Chapter 3, section 3.6 of this LAP deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the

Flooding Section the Draft CDP will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

Chapter 3, section 3.6 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment](#) CFRAMS study as the best available evidence regarding flood risk in each area. ~~In this regard, Bridgend was not identified as an Area of Further Assessment (AFA) in the CFRAMS study. Notwithstanding, as outlined in section 3.6 of this LAP, proposals for development will be required to comply with the flood risk assessment and management objectives and policies set out in the Draft CDP (Appendix A refers). Similarly, the Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Bridgend is re-produced below for ease of reference’.~~

Proposed Material Alteration Ref. GENMA3 (6):

- (vii) Amend section 8.8.2, page 112 under the header ‘Flooding’ in respect of Carndonagh so that it reads as follows:

‘Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

Chapter 3 of this LAP notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment](#). ~~CFRAMS study as the best available evidence regarding flood risk in each area. In this regard, It must also be noted that Carndonagh was identified as an Area for Further Assessment (AFA) in the OPW CFRAMS study and the preferred measure arising from the assessment was the progression of the Carndonagh Flood Relief Scheme (comprising storage on the Ballywilly Brook, hard defences, channel modification and replacement of a culvert on the Carndonagh watercourse) to project-level development and assessment for refinement and preparation for planning/exhibition and, as appropriate, implementation. Similarly, the In terms of development management, the Planning Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. CFRAMS Carndonagh Flood Extents mapping where necessary in the assessment of planning applications during the life of this LAP. The mapping for Carndonagh is re-produced below for ease of reference (Figure 8.5). The flood extents mapping for Carndonagh is re-produced below for ease of reference’.~~

Proposed Material Alteration Ref. GENMA3 (7):

- (viii) Amend section 9.7.1, page 128 under the header ‘Flooding’ in respect of Donegal Town so that it reads as follows:

‘Flooding

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the

Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

The aforementioned LAP Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment CFRAMS study](#) as the best available evidence regarding flood risk in each area. ~~In this regard, Donegal Town is identified as an Area of Further Assessment (AFA) in the CFRAMS study. Figures 9.1 and 9.2 sourced from OPW CFRAMS study show the probability of fluvial flood extents within the town centre in Donegal Town and further mapping for the outer areas of the town can be viewed at www.maps.opw.ie/floodplans.~~ Similarly, the Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Donegal Town is re-produced below for ease of reference’.

Proposed Material Alteration Ref. GENMA3 (8):

- (ix) Amend section 10.7.2, page 145 under the header ‘Flooding’ in respect of Killybegs so that it reads as follows:

Chapter 3 deals with the issue of flooding generally for the seven towns addressed in this LAP and provides that the rationale and policy framework contained in the Flooding Section of the Draft CDP 2018-2024 will be applied. The aforementioned rationale is based largely around the following keynote documents:

- Planning System and Flood Risk Management-Guidelines for Planning Authorities (DoEHLG, 2009); and
- National Catchment-Based Flood Risk Assessment and Management (CFRAMS) programme (OPW).

Chapter 3 notes that in identifying settlement boundaries and lands for development during the LAP preparation process, the Planning Authority has had due regard to the [outputs of a Stage 2 Strategic Flood Risk Assessment CFRAMS study](#) as the best available evidence regarding flood risk in each area. ~~In this regard, It must also be noted that Killybegs was identified as an Area for Further Assessment (AFA) in the CFRAMS study and the preferred measure arising from the assessment was the progression of the Killybegs Flood Relief Scheme, comprising hard defences, to project-level development and assessment for refinement and preparation for planning/exhibition and, as appropriate, implementation. Similarly, the Authority will have due regard to the CFRAMS Killybegs Flood Extents mapping where necessary in the assessment of planning applications during the life of this LAP. The mapping for Killybegs is re-produced below for ease of reference (Figures 10.2-10.4 refer).~~ [In terms of development management, the Planning Authority will have due regard to the Flood Extents mapping arising from the SFRA where necessary in the assessment of planning applications during the life of this LAP. The flood extents mapping for Killybegs is re-produced below for ease of reference’.](#)

- (x) Amend the Environmental Report at section 7.3, page 168 so that it reads as follows:

‘7.3 Strategic and Policy Framework within the Local Area Plan

The Draft County Development Plan 2018-2024 (the Draft CDP) considers that the Draft Flood Risk Management Plans for UoM 1,35 and 36 and the associated Flood Hazard Mapping collectively constitute a strategic flood risk management plan for the County representing the best information currently available for the future management of development in Donegal vis-à-vis flood risk. In this regard the Draft LAP has utilised Flood Risk Management Plans and Flood Hazard Mapping as a strategic framework to inform zoning designations to guide the location of

~~new development and infrastructure.~~—A Stage 1 Strategic Flood Risk Assessment (SFRA) was carried out in respect of the Draft County Donegal Development Plan 2018- 2024 and it recommended the need for a stage 2 SFRA in respect of the seven towns covered by the LAP. As a result a Stage 2 SFRA has been prepared in accordance with the Planning System and Flood Risk Management-Guidelines. The SFRA covers each of the seven towns and is a background document to the LAP. The SFRA resulted in the preparation of mapping in respect of flood extents (Flood zones A and B) and these are inserted at the relevant section of the core document of the LAP on each town.

The Draft LAP sets out an overall strategy for the proper planning and sustainable development of the seven towns in the context of the Draft CDP. The general development management policies and standards of the Draft CDP are applicable to the Draft LAP. Chapter 3 of the Draft LAP deals with the issue of flooding generally for the seven towns and the rationale and policy framework contained in the Flooding Section of the Draft CDP will be applied. In this regard, management of Flood Risk in the Draft LAP is subject to the aims, objectives and policies set out in the Draft Plan.

In identifying settlement boundaries for the Draft LAP, the Planning Authority has had due regard to the ~~CFRAMS study~~ **outputs of the SFRA** as the best available evidence regarding flood risk in each of the seven towns, ~~as described below:-~~

An Clochán Liath (Dungloe)

An Clochán Liath has not been identified as an Area of Further Assessment (AFA) in the CFRAMS study.

Ballybofey-Stranorlar

~~Ballybofey-Stranorlar was identified as an Area for Further Assessment (AFA) in the CFRAMS study and the preferred measure arising from the assessment was the progression of the Ballybofey & Stranorlar Flood Relief Scheme: Option 3, comprising hard defences and improvement of channel conveyance, to project level development and assessment for refinement and preparation for planning/exhibition and, as appropriate, implementation. Similarly, the Planning Authority will have due regard to the CFRAMS Ballybofey-Stranorlar Flood Extents mapping where necessary in the assessment of planning applications during the life of the LAP. Figure 7.1 sourced from OPW CFRAMS study shows the probability of flood extents within the town centre in Ballybofey-Stranorlar and further mapping for the outer areas of the town can be viewed at www.maps.opw.ie/floodplans.~~

Ballyshannon

Ballyshannon has not been identified as an Area of Further Assessment (AFA) in the CFRAMS study.

Bridgend

Bridgend has not been identified as an Area of Further Assessment (AFA) in the CFRAMS study.

Carndonagh

~~Carndonagh was identified as an Area for Further Assessment (AFA) in the CFRAMS study and the preferred measure arising from the assessment was the progression of the Carndonagh Flood Relief Scheme Option 1, comprising storage, hard defences and improvement of channel conveyance, to project level development and assessment for refinement and preparation for planning/exhibition and, as appropriate, implementation. Similarly, the Planning Authority will have due regard to the CFRAMS Carndonagh Flood Extents mapping where necessary in the assessment of planning applications during the life of the LAP. Figure 7.2 sourced from OPW CFRAMS study shows the probability of flood extents within the town centre in Carndonagh and further mapping for the outer areas of the town can be viewed at www.maps.opw.ie/floodplans.~~

APPENDIX C

Amendments to Housing Land Supply in Carndonagh arising from Proposed Material Alterations

APPENDIX D

Maps of Proposed Material Alterations to the Draft Seven Strategic Towns Local Area Plan 2018-2024

APPENDIX D1

MAPS OF PROPOSED MATERIAL ALTERATIONS FOR AN CLOCHÁN LIATH (DUNGLOE)

APPENDIX D2

MAPS OF PROPOSED MATERIAL ALTERATIONS FOR BALLYBOFEY-STRANORLAR

APPENDIX D3

MAPS OF PROPOSED MATERIAL ALTERATIONS FOR BALLYSHANNON

APPENDIX D4

MAPS OF PROPOSED MATERIAL ALTERATIONS FOR BRIDGEND

APPENDIX D5

MAPS OF PROPOSED MATERIAL ALTERATIONS FOR CARNDONAGH

APPENDIX D6

**MAPS OF PROPOSED MATERIAL ALTERATIONS FOR
DONEGAL TOWN**

APPENDIX D7

MAPS OF PROPOSED MATERIAL ALTERATIONS FOR KILLYBEGS

