



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

Strategic Environmental Assessment Statement of the Donegal County Climate Action Plan 2024- 2029

FEBRUARY 2024

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This report has been prepared by Minogue Environmental Consulting Ltd with all reasonable skill, care and diligence. Information report herein is based on the interpretation of data collected and has been accepted in good faith as being accurate and valid.

This report is prepared for Donegal County Council and we accept no responsibility to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at their own risk.

1 Strategic Environmental Assessment Statement

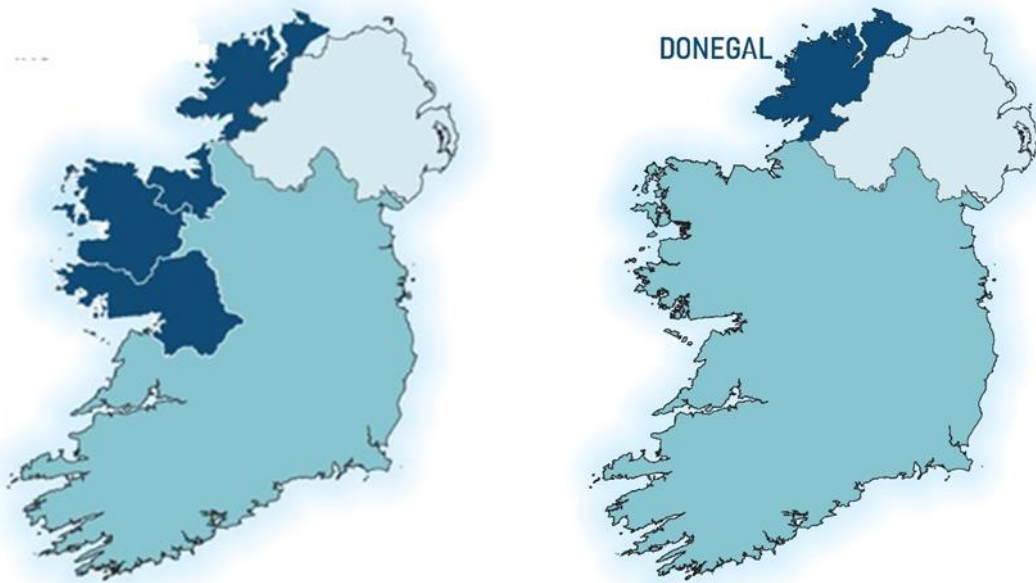
1.1 Introduction

A Strategic Environmental Assessment was undertaken on the Donegal County Climate Action Plan (CAP)2024-2029 in order to comply with the SEA Directive. Strategic Environmental Assessment (SEA) is the formal evaluation of the likely significant environmental effects of implementing the Development Plan and is carried out at each stage of the Plan preparation process. The SEA Environmental Report (2023) accompanies the Donegal County CAP and contains the findings of this assessment. An SEA Statement is the final aspect of the SEA process. The *Strategic Environmental Assessment Guidelines, Assessment of the Effects of Certain Plans and Programmes on the Environment (DEHLG 2004)* sets out that the purpose of the SEA Statement is to summarise the following:

- How environmental Considerations and the Environmental Report were factored into the Plan;
- How submissions/consultations were taken into account;
- Reasons for choosing the Plan as adopted, in light of other reasonable alternatives considered;
- Monitoring Measures.

Figure 1.1 below presents the plan area within the Atlantic Seaboard North CARO.

FIGURE 1-1 DONEGAL COUNTY AND THE CARO ATLANTIC SEABOARD NORTH



1.2 How Environmental Considerations and the Environmental Report were factored into the Plan and how Submissions/Consultations were taken into account

SEA was integrated into the various stages of the plan making process and guided the preparation of alternative scenarios, and actions across several themes including governance and leadership, built environment, natural environment, and decarbonizing zone amongst others.

The SEA process was carried out having regard to international and national legislation, strategies, plans and guidelines on environmental protection and sustainable development. Submissions received from Environmental Authorities were also taken into account in the drafting of the Donegal

County CAP and Environmental Report. Recommendations from environmental assessments relating to European sites also informed the SEA process. The specific steps taken were as follows:

1.2.1 Scoping Consultation

Donegal County Council formally consulted with Environmental Authorities during the 'scoping' stage of the SEA process, issued to the statutory environmental authorities from 2nd October to 27th October 2023.

This consultation identified the range of environmental issues and the level of detail to be included in the Environmental Report.

Table 1-1 Summary of Scoping Submissions from Environmental Authorities

Consultee	Summary of comments	SEA Response
EPA	<p>The scale of the challenge facing Ireland to address climate change is significant, as highlighted in our State of Environment Report 'Ireland's Environment - An Integrated Assessment 2020' 1 (EPA, 2020). We urgently need to accelerate action to reduce our greenhouse gas emissions and implement adaptation measures to increase our resilience to climate change.</p> <p>We acknowledge that draft strategic goals look to address energy, the built environment and related infrastructure, transportation, natural environment and green infrastructure, Economic development and green enterprise/business, community resilience and just transition, and Governance related aspects. We also acknowledge that the Plan will take account of both climate mitigation and climate adaptation actions. We recognise the importance of ensuring that the National Transition Objective is underpinned by a clean, healthy and well-protected environment.</p> <p>It is important, in developing and implementing the Plan, that it is set within the context of a wider and more integrated approach to environmental protection.</p>	<p>Noted.</p> <p>Noted, and agreed.</p>
	<p>We note that the Plan will progress the climate adaptation and mitigation required at a local level and will support - a clear pathway to implement national climate policy locally and prioritise action on evidence-focused climate measures that need to be taken.</p> <p>The SEA should play a key role in ensuring that this is achieved and should inform decision-making around the assessment and selection of actions and measures. The SEA should also assist in identifying ways to maximise the potential co-benefits of climate related measures for air quality, human health, biodiversity, water quality and other interrelated areas (i.e. win-win solutions).</p> <p>A key role of SEA is in assessing and informing the selection and refinement of actions and measures that maximise the co-benefits of climate actions for the wider environment and society. This should be highlighted in the SEA Report and the Plan</p>	<p>Noted, the SEA and AA has influenced the CAP and provided additional recommended actions as well as amendment of existing actions to enhance overall environmental performance of the CAP. These include co benefits and cross cutting mitigation measures.</p>
	<p>You should ensure that the Plan aligns with national commitments on climate change mitigation and adaptation, (such as the latest National Climate Action Plan) as well as any relevant sectoral or regional adaptation plans and adjacent local authority climate action plans.</p> <p>The Plan should include a commitment to consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan over the lifetime of the Plan.</p> <p>The Plan and SEA should consider the recent Climate Council Annual Review report, which is</p>	<p>Relevant sectoral climate action and adaptation plans are considered within Chapter 3 and 4 of this SEA ER.</p> <p>Noted, agreed.</p>

Consultee	Summary of comments	SEA Response
	<p>available at: https://www.climatecouncil.ie/councilpublications/annualreviewandreport/CCAC-AR2023-FINAL%20Compressed%20web.pdf</p> <p>Additionally, the relevant objectives and policy commitments of the National Planning Framework and the Northern and Western Regional Spatial and Economic Strategy and the Donegal County Development Plan should be aligned with and considered, as appropriate.</p>	<p>Relevant objectives from national, regional and county plans are considered and aligned with as relevant.</p>
	<p>Greenhouse Gas Emissions In preparing the Plan and SEA, the direct and indirect impacts of the Plan on greenhouse gas emissions and removals should be assessed. The Agency's most recent projections reports Ireland's Greenhouse Gas Emissions Projections 2022-2040 (EPA, 2023) and Ireland's Provisional Greenhouse Gas Emissions 1990-2022 (EPA, 2023) should be considered. The Climate Action Plan identifies actions to decarbonise electricity generation, the built environment and transport and to move towards carbon neutrality for agriculture, forest and land use sectors. The Plan should also integrate and align with the relevant actions in the Climate Action Plan, as appropriate</p>	<p>Actions in the plan address transport, built environment, landuse, as well as agriculture and forestry. Some additional actions are recommended in this regard through the SEA and AA assessment processes.</p>
	<p>Climate Adaptation In preparing the Plan and SEA, you should consider how the impacts of climate change, individually and in combination, are likely to influence the implementation of the Plan. The Plan should look to improve resilience of existing and planned critical infrastructure, systems and procedures to the effects and variability of climate change. Vulnerable populations should be considered in the context of just transition/adaptation. The cascading effects of proposed adaptation measures should also be considered. Recent extreme weather events could be useful to assist in identifying areas where for further work is needed to improve resilience, e.g. the resilience of critical water service infrastructure to flooding and drought</p>	<p>The cumulative effects of adaptation measures is considered in Chapter 7 of this SEA.</p>
	<p>The Plan should include appropriate adaptation measures that can be implemented either directly or through relevant land use plans and/or specific plans e.g. Flood Risk Management Plans, River Basin Management Plans etc. The Plan will also help inform local authority land use and transport planning. Additional aspects to consider may include changes in native species and habitats and the spread of invasive species, pests and pathogens. In this regard, the Plant Atlas 2020 project looking at Ireland's changing flora might be useful to consider. A summary of this results can be found at: https://bsbi.org/wpcontent/uploads/dlm_uploads/2023/02/BSBI-Plant-Atlas-2020-summary-reportIreland-WEB.pdf</p>	<p>Will be considered and integrated as appropriate.</p>
	<p>Water Quality The Plan should consider the most recent Water Framework Directive water quality status and risk information, available on the EDEN WFD app. Relevant future projections of river flow are available</p>	<p>Noted, considered as relevant.</p>

Consultee	Summary of comments	SEA Response
	<p>in either EPA research reports (such as HydroPredict, pending), or academic papers related to these projects.</p>	
	<p>Air quality The Plan should consider the Draft National Clean Air Strategy (DECC). The Air Quality in Ireland 2021 Report (EPA, 2022) sets out the most recent status in each of the four air quality zones in Ireland and may be useful to consider. Data on levels of atmospheric pollutants from the EPA’s national ambient air quality monitoring network should also be integrated as appropriate. The pollutants of most concern are traffic-related, including Particulate Matter and Nitrogen Dioxide.</p>	<p>Noted, considered given localised transport emissions and impacts on biodiversity, water and human health.</p>
	<p>Recent EPA Climate change related publications Some recent climate change publications that may be useful to consider in preparing the SEA and the Plan are shown below: - Ireland's Greenhouse Gas Emissions Projections 2022-2040 (EPA, 2023) - Ireland's Final Greenhouse Gas Emissions 1990-2021 (EPA, 2023) - Ireland’s Provisional Greenhouse Gas Emissions 1990-2022 (EPA, 2023) - Climate Change’s Four Irelands (EPA, 2022) - Ireland’s Air Pollutant Emissions 2021 (1990-2030) (EPA, 2023)</p> <p>Additionally, further reports/publications are available at: can be consulted at https://www.epa.ie/publications/monitoring--assessment/climate-change/.</p> <p>Research report 429: Building Coastal and Marine Resilience in Ireland (EPA, 2023) may be useful to consider. It discusses the need for identification and increased awareness of climate change risks to Ireland’s coastal communities. It also highlights the importance of building national resilience across socio-ecological and economic systems. Other climate- related environmental research reports are available at: https://www.epa.ie/publications/research/climate-change</p>	<p>Noted, will be reviewed and included as appropriate.</p> <p>SEA mitigation measure includes this publication re coastal and marine resilience.</p>
	<p>EPA State of the Environment Report Our State of Environment Report, Ireland’s Environment - An Integrated Assessment 2020 (SOER2020) identifies thirteen high level ‘Key Messages for Ireland’. Delivering Ireland’s long-term sustainable development and environmental objectives will involve many different stakeholders to address these key actions. The report recognises the need for full implementation of existing environmental legislation and review of governance/coordination on environmental protection across public bodies. Specifically, information provided in the following chapters should be considered, as appropriate and relevant. - Chapter 2 (Climate) highlights the clear need for systemic change in Ireland to ensure the country will become the climate neutral and climate resilient society it aspires to be. More urgency is needed to deliver actions on climate mitigation and adaptation and to ensure that Ireland meets its international obligations to reduce greenhouse gas (GHG) emissions. Further measures are required to meet national and EU ambitions</p>	<p>Noted</p>

Consultee	Summary of comments	SEA Response
	<p>to keep the global temperature increase to 1.5°C.</p> <p>Population and Human Health: Air quality and water quality considerations should also be included in the list of aspects to be considered in relation to population and human health. Issues around equity and how vulnerable groups can be best assisted in dealing with and adapting to climate change should be considered, as relevant to the Plan.</p> <p>Biodiversity: The Plan should also seek to protect existing green and blue infrastructure and key ecological corridors from inappropriate development.</p> <p>Water Resources: With regards flooding, the Plan should consider the need for appropriate zoning and development of lands to avoid incompatible land uses in areas at risk of significant flooding.</p> <p>Soils / Geology: The protection of high nature value farming areas, and key agricultural lands should be considered. Where natural resources are required to support development, these should be carried out as efficiently as possible.</p> <p>Landscape: The key issues for the SEA to consider could also include the potential ‘visual impact’ of any proposed measures with potential to impact on sensitive landscape areas.</p> <p>Material Assets Transportation: The Plan should align with the transport commitments in the National Planning Framework, Northern and Western Regional Spatial and Economic Strategy, where appropriate and relevant.</p> <p>Water Supply: Uisce Eireann’s National Water Resources Adaptation Framework (and any relevant Regional Water Resource Plans) takes account of potential climate change implications for drinking water supply/service provision and may be also useful to consider.</p> <p>Cross-cutting issues Climate change will affect all aspects of our economy and society, with many issues impacting on the operations of individual local authorities. In implementing the Plan and in responding effectively to climate change, coordination, and collaboration among stakeholders on cross-cutting issues is needed</p>	<p>These topics are considered in Chapters 4, 7 and mitigation measures recommended as appropriate .</p>
<p>Strategic Environmental Assessment Team DAERA - NIEA</p>	<p>DAERA would like the SEA Environmental Report to contain a clear statement indicating the opinion about whether or not the implementation of the of the strategy is likely to have a significant effect on the environment of Northern Ireland, in combination with any identified measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment</p>	<p>Noted, a statement to this effect is provided in Chapter 7.</p>
	<p>Transboundary issues arising from this plan should be considered as part of the forthcoming SEA including the potential disturbance to/impact on NI/RoI migratory/mobile species. Cross border designated sites, European sites in Northern Ireland adjacent to or with pathways to/from the Republic of Ireland, priority habitats, river basins, and other landscape types also require special attention as ecological functionality and ‘views’ of landscape cross political boundaries. The SEA</p>	<p>Noted, will be considered, described and assessed as appropriate.</p>

Consultee	Summary of comments	SEA Response
	<p>should consider all potential impacts including those which may impact Northern Ireland both directly and indirectly. Consideration should be given to all potential impacts on NI habitats (particularly designated sites, priority habitats and those important for migratory species and NI populations) including habitat quality and conservation status</p>	
	<p>We welcome that a parallel Appropriate Assessment in relation to the CAP is being carried out. This should also consider potential impacts on NI designated sites as appropriate. Please note following the decision of the United Kingdom to leave the European Union, the collective term of “Natura 2000” sites the network of European protected sites are now known as “National Site Network” sites within the United Kingdom, including Northern Ireland</p>	<p>Noted.</p>
	<p>It may be worth including in your considerations the following: • The Wildlife (NI) Order 1985 (as amended) • Wildlife and Natural Environment Act (NI) 2011 • The Conservation (Natural Habitats, etc.) Regulations (Northern Ireland) 1995 (as amended) • The Environment (NI) Order 2002 • The Planning (Environmental Impact Assessment) Regulations (Northern Ireland) 2017 • The Strategic Planning Policy Statement (SPPS) for Northern Ireland • Planning Policy Statements (PPS – in particular PPS2). It should be noted that the PPS’s will be superseded by Local Development Plans when they are adopted. • Biodiversity Strategy for NI to 2020 https://www.daerani.gov.uk/publications/biodiversity-strategy-northern-ireland-2020-0 • Draft Environment Strategy https://www.daera-ni.gov.uk/consultations/esnipublic-discussion-document • The Draft NI peatland policy: https://www.daera-ni.gov.uk/consultations/nipeatland-strategy-consultation • The Draft Green Growth Strategy Consultation on the draft Green Growth Strategy for Northern Ireland Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk) • Northern Ireland Energy Strategy 2050 Northern Ireland Energy Strategy 2050 Department for the Economy (economy-ni.gov.uk)</p>	<p>Noted, these are considered and included as appropriate</p>
	<p>A number of useful information sources that highlight the current state of the environment in Northern Ireland at a regional level and which could be referenced are: • Northern Ireland State of the Environment Reports: https://www.daerani.gov.uk/publications/state-environment-report-2013 • Northern Ireland Environmental Statistics Reports: https://www.daerani.gov.uk/articles/northern-ireland-environmental-statistics-report Other relevant web-links are; • Designated Scientific Sites: www.daera-ni.gov.uk/landing-pages/protected-areas • Regional Landscape Character Map viewer: https://www.daerani.gov.uk/services/regional-landscape-character-areas-map-viewer DAERA have a map browser for NI protected sites and known priority habitat: www.daera-ni.gov.uk/services/natural-environment-map-viewer Our natural environment datasets are available at the link below: www.daera-ni.gov.uk/articles/download-digital-datasets Appropriate Assessments should refer to the status of habitats and species in the relevant reports available on the JNCC website as follows: UK Article 17 report for the Habitats</p>	<p>Noted, these will be considered and included as appropriate</p>

Consultee	Summary of comments	SEA Response
	<p>Directive https://jncc.gov.uk/our-work/article-17-habitats-directive-report-2019/ and the UK Article 12 report for the Birds Directive https://jncc.gov.uk/ourwork/european-reporting/#birds-directive-reportin</p>	
	<p>AQUB suggest that consideration is given to the impact of ammonia emissions (as a key pollutant) to both the natural environment and human health. Ireland is now included in the Air Pollution Information System (APIS) which provides information on the impacts of air pollutants, such as NOx, ammonia emissions and the associated N deposition on sensitive habitats and species. The map feature within APIS enables detailed information to be provided on the Critical Levels/Loads for each qualifying feature and background levels of these pollutants: APIS app</p>	<p>Noted, ammonia emissions are primarily from agricultural activities in N. Ireland but may give rise to transboundary effects. Will be considered as appropriate</p>
	<p>The SEA should consider all issues in relation to the aquatic environment during all aspects / phases in relation to the implementation of County Donegal Climate Change Action Plan 2024 -2029. Impacts that should be considered include, (but may not limited to), those relating to water quality, water quantity, hydromorphology, and in addition any impact on NI/RoI migratory/mobile species such as salmon.</p> <p>Assessment should consider all potential impacts both direct and indirect. It is important that cross border river basins are given special attention as ecological functionality cross jurisdictional boundaries. After consideration, the SEA should clearly state whether, or not, any potential impacts to the aquatic environment in Northern Ireland have been identified and the nature of those impacts.</p>	<p>Will be considered as appropriate.</p>
	<p>River Basin Management Plans are the key tools for implementing the Water Framework Directive and to achieving its objectives. If the potential for transboundary impacts to Northern Ireland are identified, then the NI River Basin Management Plans must be considered during the SEA process.</p>	<p>Noted, will be considered and included as appropriate</p>
Marine	<p>Relevant Plans and Programmes</p> <p>From a transboundary marine perspective, it is recommended the following Northern Ireland relevant plans and programmes should be considered:</p> <ul style="list-style-type: none"> • The Marine Act (Northern Ireland) 2013 • The Marine and Coastal Access Act 2009 • The UK Marine Policy Statement 2011 • The Draft Marine Plan for Northern Ireland 2018 • Towards an Integrated Coastal Zone Management Strategy 2006 - 2026. <p>Consideration of these documents in the next stages of the SEA process will enable the potential for transboundary marine effects in the Northern Ireland marine area to be considered and drawn out in the assessment.</p>	<p>Noted, and will be included as appropriate. This section of the DAERA Scoping submission was omitted by mistake at scoping stage and was corrected in Final SEA ER.</p>

Consultee	Summary of comments	SEA Response
	<p>Further information on these can be found at Marine planning Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk) and Towards an Integrated Coastal Zone Management Strategy for Northern Ireland 2006 - 2026 Department of Agriculture, Environment and Rural Affairs (daera-ni.gov.uk)</p>	
	<p>The Landscape Team welcomes that Landscape and Visual amenity has been considered within the draft Objectives. The Donegal Climate Action Plan has potential to impact on the Northern Ireland Landscape located in border areas and therefore the Northern Ireland landscape should be considered within the SEA Environmental Report.</p> <p>It is recommended the SEO's are amended to ensure the potential for effects in the marine area are included in the assessment.</p> <p>For example, for the Biodiversity, Flora and Fauna SEOs, specific reference should be made to the conservation, protection, maintenance and appropriate restoration of marine biodiversity, flora and fauna, including marine designations and protected sites. In addition, the safeguarding of biodiversity in the wider environment, should also include the marine environment. In this regard, the reference to the protection, the avoidance of deterioration and the appropriate enhancement in relation to the quality of marine waters is welcomed. It is assumed the Environmental Report will include an assessment of effects on each of the 11 descriptors set out in the Marine Strategy Framework Directive, particularly for those elements not covered by Water Framework Directive in coastal waters, to ensure full consideration of the marine environment.</p> <p>For Air and Noise, it is recommended reference is made in the first bullet point to harmful effects on human health and the environment, including effects from underwater noise, to ensure effects on the marine environment are also considered.</p> <p>For Landscape, it is recommended the SEO is extended to include the protection and management of seascape.</p> <p>It is unclear if underwater and maritime heritage is included in the SEO for Cultural Heritage.</p>	<p>Noted, will be considered and included as appropriate</p> <p>Noted, given the actions in the CAP it is not considered appropriate to assess the 11 descriptors at this junction.</p> <p>SEO amended</p>
Historic Environment Division	<p>In relation to Cultural Heritage, HED suggest that the issue of potential for impacts on the setting of heritage assets through construction of new infrastructure be factored in. The potential for direct impacts on historic buildings e.g from retrofitting works or micro-renewable technologies, should also be considered.</p>	<p>Noted, considered and included as appropriate</p>
	<p>We would suggest that the SEA objective in relation to cultural heritage be amended to consider conservation and enhancement of cultural heritage. – i.e. “protect conserve and enhance.....” , given that conservation is about the management of change affecting heritage assets in a way that</p>	<p>Noted, considered and included as appropriate. SEO will be amended to</p>

Consultee	Summary of comments	SEA Response
	<p>helps to sustain and enhance their significance. Given the intertwined nature of the historic environment with landscape and the natural environment, HED advise that consideration of the potential for transboundary impacts in the Cultural Heritage topic area, particularly with regard to potential impacts on setting of assets would be relevant. Many heritage assets predate the border itself and correlate to other assets in either jurisdiction, with interweaving views and settings, and some assets such as ancient earthworks, routeways and canals traverse it.</p>	<p>reflect recommendation.</p>
<p>Dept of Transport</p>	<p>Below are examples of ways in which the Local Authority Climate Action Plans can support national climate policy in the context of the transport sector:</p> <ul style="list-style-type: none"> • Local Authorities can lead by example in their organisations by decarbonising their own vehicle fleets. • Local Authorities also have an important role in developing local area networks for EV charging infrastructure to meet the needs of their residents who cannot charge their vehicles at home, and, through the co-location of shared mobility services, to meet the needs of residents who don't own vehicles. • Local Authorities have a key role in delivery of active travel programmes by expanding walking and cycling facilities in their areas, including shared mobility services, and enhancing the public realm to increase safety and connectivity for pedestrians and cyclists by retrofitting existing infrastructure and providing new infrastructure. • Local Authorities can facilitate the integration of safe and convenient alternatives to the private car into the design of local communities in line with Transport Orientated Development principles and by prioritising walking and cycling accessibility to both existing and proposed development 	<p>The CAP has been developed by Donegal CC and actions included as appropriate</p>
	<p>The key performance indicators and targets outlined in the CAP23 Transport chapter are intended to illustrate the level of change required by 2030, including:</p> <ul style="list-style-type: none"> • a reduction of fossil fuel use in transport by 50% • a reduction in total kilometres driven of 20% • a reduced modal share of daily car journeys from 71% to 53% • a 50% increase in daily active travel journeys; a 130% increase in daily public transport journeys; and a 25% reduction in daily car journeys • a 30% shift of all escort to education car journeys to sustainable modes • an EV share of total passenger car fleet at 30%, with 100% share of new registrations <p>In addition, Local Authority climate action plans also should recognise the continued need to identify additional measures to deliver the level of ambition required. This includes, amongst others, the identification and implementation of further road space reallocation opportunities, pedestrian and cycling enhancement plans as well as various demand management measures.</p>	<p>As above.</p>

Consultee	Summary of comments	SEA Response
	<p>Recommendations made in relation to the CAP under the following themes with background information also provided:</p> <ul style="list-style-type: none"> Public Engagement & Project Acceptance Communications Smart and Sustainable Mobility Workshops / SMP “Accelerator” Workshop programme Demand Management, Parking Policy, Air Quality and Sustainable Mobility Active Travel Infrastructure Road-space Reallocation, DMURS, Accessibility and Public Realm Integrated Land Use and Transport Planning Climate Adaptation EV Charging Infrastructure 	<p>Noted the datasets have been considered through the SEA process and applied as appropriate.</p>
<p>Geological Survey of Ireland</p>	<p>With reference to your email received on the 09 October 2023, concerning the Donegal County Council Climate Action Plan 2024-2029, Geological Survey Ireland would encourage use of and reference to our datasets. This data can add to the content and robustness of the SEA process. With this in mind please find attached a list of our publicly available datasets that may be useful to the environmental assessment and planning process. We recommend that you review this list and refer to any datasets you consider relevant to your assessment. The remainder of this letter and following sections provide more detail on some of these data.</p> <p>Recommended datasets include: Geoheritage, Groundwater, Geotechnical, Geohazards, Geothermal energy, Natural resources plus research projects.</p>	<p>Noted the datasets have been considered through the SEA process and applied as appropriate.</p>

1.2.2 Preparation of Donegal County CAP 2024 -2029

As part of the Environmental Report, baseline data was provided on the current state of the environment in and adjacent to the plan area of Donegal County. This was collated through a review of currently available data, as recommended in SEA Guidelines and related to indicators set out in the SEA Directive: biodiversity flora and fauna; population and human health; soil; water; air and climatic factors; material assets; cultural heritage and landscape. Recommendations from environmental assessments relating to European sites also informed the preparation of the Strategy and Environmental Report, these assessments are contained in the *Natura Impact Statement (NIS)*. The SEA ER also applied ecosystem services from NPWS mapping to demonstrate water retention, filtration and carbon in soil at plan level. Where SEA Scoping submissions highlighted research, for example EPA recommendations on research such as the attitudes to climate change (Climate Change in the Irish Mind - Support for Climate Policies' and Climate Change in the Irish Mind - Climate Risk Perceptions), these were integrated to the baseline of the SEA and discussion of significant impacts.

Baseline information and consideration of alternatives were reviewed from other strategies and plans, namely the Donegal County Development Plan 2018 -2024, draft Donegal CDP 2024 -2030, other concurrent climate action plans being prepared across other local authorities and supporting environmental assessments (SEA and AA).

The key environmental issues considered included the following and the SEA ER provided key recommendations to address same (see table 1. 2 below)

Table 1-2: Key Environmental Issues

Indicator	Summary of Issues and SEA Recommendations
Biodiversity Flora and Fauna	<ul style="list-style-type: none"> • Focus is being put on predicting how a changing climate will impact on some of our most threatened species, for example species at the range limits. Combined with change landuse patterns and activities most recently research (2023¹) record a decline in range and abundance or both of native plant species with native grassland species suffering the greatest decline. Lakes and wetlands have also been affected; some lakes are now dominated by the few aquatic plants favoured by nutrient enrichment, such as the introduced Nuttall's Pondweed. There is evidence that climate change may have affected the Irish flora by helping some southern species to spread northwards. • In Donegal County one of the most prevalent impacts of climate change in recent years has been the increase in flood events. Management of flood-related issues is therefore of critical importance to the future sustainable development of the county. • Coastal erosion is another prevalent impact of climate change in the county. Over a period of decades, this will inevitably lead to loss or modification of some coastal habitats and interference with human use of the coastal zone. • Marine and coastal non native and invasive species are also identified as an issue and may be accidental introduced or migrate due to changing conditions of marine and coastal habitats . • Energy efficient lighting can also have adverse effects on wildlife. <p>SEA recommendation:</p> <ul style="list-style-type: none"> • Clear and measurable actions to address nature-based solutions to support co benefits and ecologically driven responses to interventions around climate change impacts, mitigation and adaptation. • Actions to address and respond to invasive species. • Creating space for nature at landscape scale to facilitate mobile species. • Research into interactions between climate change on soil, water, air and biodiversity.

¹ Botanical society of Britain and Ireland Plant Atlas 2020. [BSBI-Plant-Atlas-2020-press-release-Ireland-FINAL.pdf](https://www.bsbi.org/press-releases/bsbi-plant-atlas-2020-press-release-ireland-final.pdf)

Indicator	Summary of Issues and SEA Recommendations
Population and Human Health	<ul style="list-style-type: none"> • Climate² change can influence health through altering exposure to stressors such as extreme weather events; vector-, food- and waterborne infectious diseases; changes in the quality and safety of air, food, and water; and stresses to mental health and wellbeing. • Exposures that result from climate change can be categorised as exposures with direct health impacts (e.g. storm, drought, flood, heat wave, temperature change, wildfires) or exposures with indirect health impacts (e.g. water quality, air quality, land use change, ecological change). • The extent to which exposures which result from climate change impacts on health will be influenced by mediating factors, including individual or social factors such as demographics, socio-economics, health status, access to care, conflict. environmental factors for example geography, baseline weather, air and water quality, vegetation. institutional capacity such as primary health care, warning systems. • The potential climate change impacts on health are wide ranging such as deaths, injuries, respiratory disease, heat stroke, poisoning, water-borne diseases, infectious diseases, under nutrition, mental illness. • Health gains can occur from key climate change actions (“co-benefits”) such as: increasing consumption of diets with low greenhouse gas emissions and improving agriculture and good waste practices. Reducing co-pollutants from household solid fuel combustion, better lighting and application of passive design principles. Reducing greenhouse gases and associated co-pollutants from industrial sources. Increasing energy efficiency, reducing demand for fossil fuels and increasing demand renewable energy. Increasing green areas in urban spaces. Increasing active travel, modifications to public transport and to the built environment. • EPA (2023) research³ identified that people in Ireland feel that ‘others’ - such as future generations or people far away - are more threatened by climate change than themselves in the here and now. At County scale 79 % of respondents were worried about climate change. <p>SEA Recommendations</p> <ul style="list-style-type: none"> • Actions to support community awareness, engagement and ownership of climate change impacts, mitigation and adaptation. • Enhanced placemaking through nature-based solutions as an adaptive measures and support for active travel and modal shift. • Support for energy efficiency in the built environment and circular economy. • Research and support on appropriate landuse activities in the appropriate environment. • Key focus on groups and demographics more vulnerable to impacts of climate change and support in terms of addressing fuel poverty, access to local food and public transport. • Investigate and promote the potential and pivotal role creativity can play in addressing the challenges presented by climate action. Just Transition mechanisms and access to support for same.
Soil and	<ul style="list-style-type: none"> • Maintaining and enhancing soil function and its carbon storage role where possible,

² Health Impacts of Climate Change and the Health Benefits of Climate Change Action: A Review of the Literature A Department of Health Research Paper, 2019.

³ Climate Change in the Irish Mind - Support for Climate Policies and Climate Change in the Irish Mind - Climate Risk Perceptions. <https://www.epa.ie/news-releases/news-releases-2023/people-in-ireland-support-climate-policies-with-some-opposition-specific-to-local-concerns-and-issues.php>

Indicator	Summary of Issues and SEA Recommendations
Geology	<p>recognising the essential role soils, and particularly functioning peatlands (peat soils present in the western part of the plan area) can contribute to climate change mitigation and adaptation.</p> <ul style="list-style-type: none"> • Addressing extent of soil sealing, increased surface run off and variable permeability of lands in the plan area. • Retention and creation of areas of greenfield in terms of open space, green infrastructure, permeability and biodiversity considerations. • Because of the complex interrelationship between water, air and soil, declining soil quality can contribute to negative or declining water or air quality and function. Significant changes to soil condition can be brought about by the impacts of climate change including changes in air temperature, precipitation and extreme weather events - increased occurrence of summer droughts and increased winter rainfall. • High nature value farming areas, and key agricultural lands should be considered. Where natural resources are required to support development, these should be carried out as efficiently as possible. <p>SEA Recommendations</p> <ul style="list-style-type: none"> • Supporting research and actions relating to carbon sequestration in soil • Nature based solutions to provide co benefits including to retention and enhancement of soil quality and soil diversity • Reuse of brownfield lands and support for circular economy through adaptive reuse of buildings and waste streams • Support for sustainable landuse and, in particular, agricultural and forestry practices.
Water	<p>Climate change poses risks to the delivery of water management objectives, but these risks depend on local catchment and water body conditions. Climate change affects the status of water bodies, and it affects the effectiveness of measures to manage the water environment and meet policy objectives. The future impact of climate change on the water environment and its management is uncertain. Impacts are dependent on changes in the duration of dry spells and frequency of ‘flushing’ events. The following risks are identified for water resources:</p> <ul style="list-style-type: none"> • Lower water levels and higher water temperature will reduce dissolved oxygen and lead to algal blooms and increased concentration of bacteria and other pollutants in the water. • Increased precipitation increases the risk to groundwater quality from septic tank systems, agricultural, forestry and urban centre runoff. • Saltwater intrusion on freshwater systems. • River Basin Management plans will provide for more integrated management requirements for our water resources. • Climate change threatens coastal areas, which are already stressed by human activity, pollution, invasive species and storms. • Sea level rise threatens to erode and inundate coastal ecosystems and communities including unique ecosystems such as wetlands and machair (sand dunes). • Warmer and more acidic oceans are likely to disrupt coastal and marine ecosystems on native species, algal blooms. • Increase in fluvial, pluvial (urban storm water) and groundwater flood risk. • Increasing risk to our coastal communities and assets. • Threat of coastal squeeze of inter-tidal habitats where hard defences exist. • The development of flood forecasting systems in conjunction with community. <p>SEA Recommendations</p> <ul style="list-style-type: none"> • Landscape consideration of water through LAWPRO and catchment management • Support for nature-based solutions through the catchments • Management to ‘slow the flow’ and increase overall resilience of the ecosystems. • Research and assessment of risks and then supporting actions to achieving Water Framework Directive Objectives from climate change impacts.
Air and Climatic	<p>These have been identified as cross cutting impacts across all the SEA topics scoped into the SEA ER and are presented throughout the document.</p>

Indicator	Summary of Issues and SEA Recommendations
Factors	<p>Climate change is impacting ecosystems through changes in mean conditions and in climate variability, coupled with other associated changes such as increased ocean acidification and atmospheric carbon dioxide concentrations. It also interacts with other pressures on ecosystems, including degradation, defaunation and fragmentation. At the same time, ecosystems can also assist in the mitigation of, and adaptation to, climate change.</p> <p>SEA recommendations Actions in the CAP should be cross cutting and encompass all the sectors for emission reductions:</p> <ul style="list-style-type: none"> • Electricity • Transport • Built Environment (Residential, Commercial & Public Sector) • Industry & Other • Agriculture • Land Use, Land Use Change and Forestry (LULUCF) <p>A focus on nature-based solutions, the opportunity to provide co benefits for other environmental topics and strong evidence based approach to solutions is recommended. EPA data is clear that reaching the 2030 target requires implementation of policies that deliver emission reductions across all sectors in the short term. Current decarbonisation actions are being outpaced by increased energy demand across the economy and dependence on fossil fuels for energy generation. A continued lack of delivery of large-scale practical actions to decarbonise activities in all sectors will see an exceedance of the first two carbon budgets.</p>
Material Assets	<p>Flood events and possible consequent risk of subsidence may have a significant impact on critical infrastructure such as roads, rail, electricity, water and communications. This in turn would have a potential impact on productivity, economic confidence and general social wellbeing. Hotter summers could also place an additional stress on key infrastructure.</p> <ul style="list-style-type: none"> • High temperatures can result in Hot-weather-related changes in demand (e.g. higher daily and peak demand). Higher precipitation levels can result in more frequent water/wastewater asset flooding, asset loss and potential for environmental pollution as well as increased drawdown in the autumn/winter for flood capacity, leading to resource issues in the following spring/summer. • Low precipitation - Reduced availability of water resources (surface water and groundwater sources) • Increased storminess Business continuity impacts/ interruptions • More frequent water/wastewater asset flooding, asset loss and potential for environmental pollution. Interruption to business continuity⁴. <p>SEA Recommendations</p> <ul style="list-style-type: none"> • Identify material assets most at risk from impacts of climate change. • Increase resilience to effects of climate change on critical infrastructure. • Energy transition and decarbonise the plan area to help meet targets. • Energy efficiency measures and the decarbonising zone. • Support for nature-based solutions to avoid over engineering responses to impacts on material assets. • Actions relating to circular economy, food waste and local food production.
Cultural heritage	<ul style="list-style-type: none"> • The direct effects of climate change on heritage may be immediate or cumulative. Thus, damage from catastrophic events such as floods and storms are likely to increase at the same time as slow-onset environmental deterioration mechanisms. The way these impacts manifest will vary according to the sensitivity of the heritage and its exposure (Murphy and Ings, 2013). Exposure will alter with location and aspect, while sensitivity will be determined by the nature of the heritage resource (type, material) and its current condition.

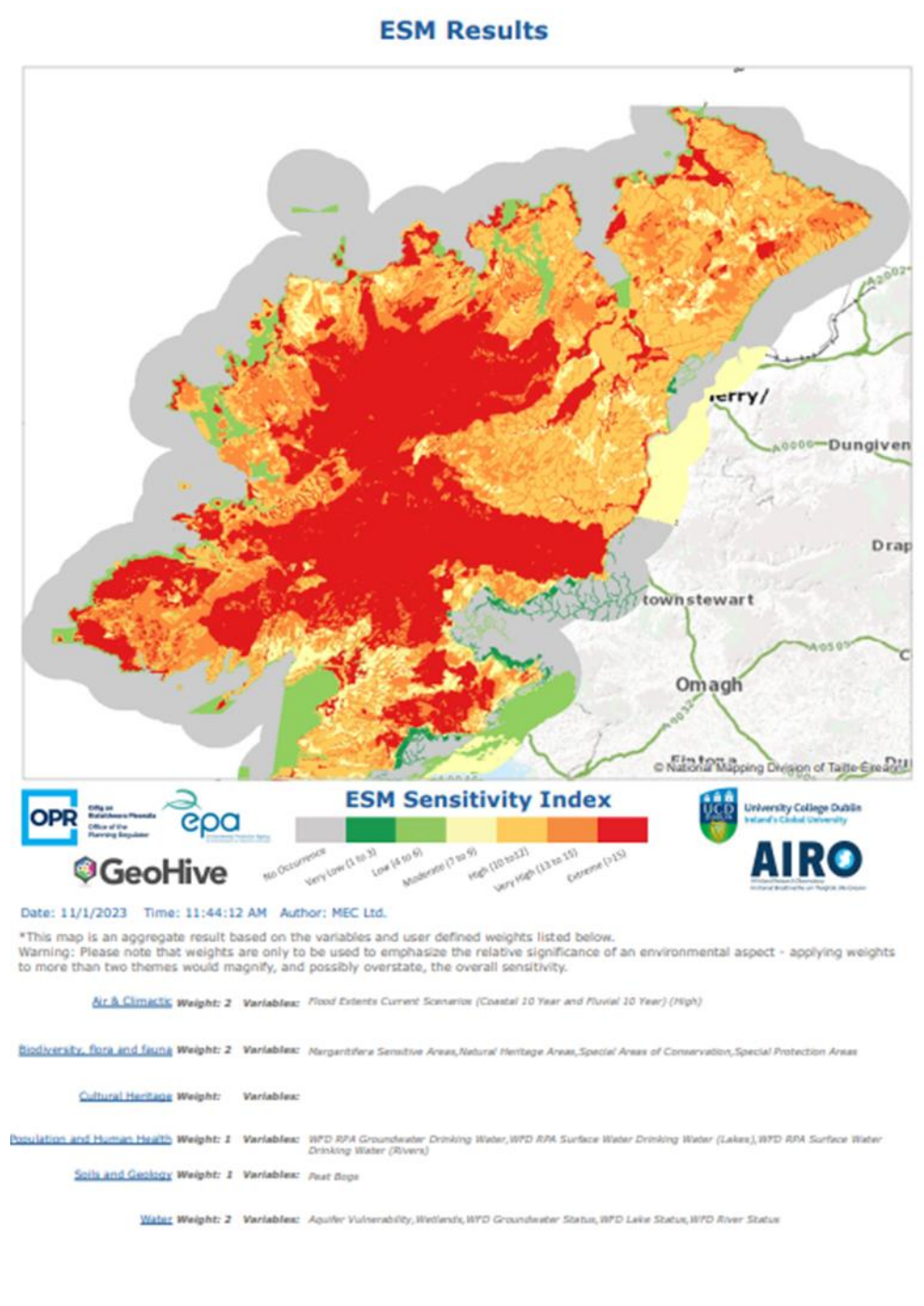
⁴ Water Quality and Water Services Infrastructure Climate Change Sectoral Adaptation Plan

Indicator	Summary of Issues and SEA Recommendations
	<ul style="list-style-type: none"> • In addition, there will be indirect impacts related to societal responses to climate change in terms of both adaptation (e.g. changes in land use) and mitigation (e.g. the renovation or upgrading of historic buildings to reduce energy consumption). • The Urban heat island effect is likely to act as a risk multiplier, meaning that buildings in urban centres will be propelled more rapidly towards damaging temperature thresholds for microbiological and/or chemical decay mechanisms. Higher temperatures can provide conditions for established pest species to spread and increase in number. • Western Atlantic Europe is likely to see an increase in biodeterioration due to mould and pests as higher temperatures provide more hospitable environments for both. • Cultural landscapes such as parks and gardens and archaeological clusters are at risk from increasing pests and diseases as well as droughts, wildfires and windthrow. Alterations in natural landscape characteristics will also impact indirectly on material cultural heritage by disturbing the 'sense of place' and on intangible culture, which expresses landscape through art, poetry and music. <p>SEA Recommendations</p> <ul style="list-style-type: none"> • Creative responses to engage on climate change through Creative Ireland support. • Support for energy efficiency and adaptive reuse of existing buildings
Landscape	<p>Landscape and townscape changes will result from climate change impacts on:</p> <ul style="list-style-type: none"> • soils and vegetation • rivers and coasts • hills and lowlands • buildings <p>Landscapes will also be affected by adaptation and mitigation measures in response to climate change, for example renewable energy infrastructure, or interventions to address surface water management, modal shifts and flooding. There is also likely to be an increase in flooding, erosion and slope instability. Semi-natural habitats are likely to change as species' favoured conditions move north. This could affect native woodlands and aquatic habitats. There are likely to be direct effects on trees and forests reflecting changing patterns of rainfall, increases in storm damage and a potential increase in pests and disease. This could be most evident in agricultural areas, woodlands, designed landscapes and settlements. The pattern of snowfall and snow lie is likely to change.</p> <p>Along low lying sections of coast, or in areas where flooding or land stability are already issues, changes in landscape character could be quite dramatic. However, for the most part these changes will be more gradual and subtle - modifying rather than transforming the landscape.</p> <p>SEA recommendations</p> <ul style="list-style-type: none"> • Landscape response to climate adaptation where possible • Integration of blue and green infrastructure • Engagement and awareness raising around landscape scale effects and response to climate change.
Transboundary	<p>Potential effects in the absence of mitigation were considered as issues as identified through the statutory consultation process identifying such issues, including landscape, seascape, marine, soil and water as well as cultural heritage.</p>

For the decarbonising zone, an environmental profile was prepared to inform the assessment and identify if required, mitigation measures.

Environmental sensitivity mapping was also used as a means to assess inter relationships across environmental topics. In addition to other baseline mapping was applied during the SEA process.

Figure 1-2 Donegal County Environmental Sensitivity Map



The Environmental Report set out Strategic Environmental Objectives (SEO) (Table 1.1). These were identified based on a current understanding of the key environmental issues, climate change action and related to the SEA ER of the Draft Donegal County Development Plan 2024 -2030 SEA ER. The CAP actions were evaluated against these SEOs. A matrix was used to rate the impact of the policies and objectives, as having potential positive, indirectly positive, neutral, uncertain, negative, or indirectly negative impacts.

Table 1-3 Strategic Environmental Objectives⁵

Strategic Environmental Objectives in the Draft Donegal County Development Plan 2024 -2030	
Climate Change (CC)	<ul style="list-style-type: none"> • Reduce Greenhouse Gas emissions in order to help mitigate climate change and meet our relevant International, European and National climate change obligations and targets including achieving the National Climate Objective. • Pursue development strategies which increase our ability to adapt to climate change and improve climate resilience. • <i>Support the delivery of all national climate policy as appropriate to the county with the prioritisation and acceleration of evidence-based measures.</i>
Population and Human Health (PHH)	<ul style="list-style-type: none"> • Provide a development and infrastructural framework which encourages economic prosperity/employment growth, adequate housing provision, balanced population growth and a socially inclusive society with lower socio-economic disadvantage. • Safeguard the Donegal’s citizens from environment-related pressures and risks to health and well-being including air, water and noise pollution, climate change and flooding. • Provide an environment increases the number of Donegal’s citizens who are healthy at all stages of life and promotes an active and high quality lifestyle in Donegal.
Biodiversity, Flora and Fauna (BFF)	<ul style="list-style-type: none"> • Conserve, protect, maintain, and where appropriate restore biodiversity, flora and fauna, natural habitats, and associated ecosystems particularly International and EU designated sites, transboundary Marine Protected Areas⁶ and protected species. • Ensure no adverse effects on the integrity of any European site, with regard to its qualifying interests, associated conservation status, structure and function. • Conserve and protect Nature Conservation sites of National Importance including NHAs, pNHAs National Parks, Nature Reserves, Wildfowl Reserves and species protected under National Legislation (e.g. Wildlife Act) • Safeguard biodiversity features in both designated sites and the wider environment which function as stepping stones for migration, dispersal and genetic exchange of wild species. • Conserve and restore biodiversity in the wider countryside. • Limit the spread, dispersal and growth of invasive species.
Soil and Geology (SG)	<ul style="list-style-type: none"> • Protect soils against pollution, and prevent degradation of the soil resource and associated ecosystem services • Safeguard areas of prime agricultural land and designated geological sites
Water (W)	<ul style="list-style-type: none"> • Protect, avoid deterioration of and, as appropriate, restore/enhance the quality of surface, ground and marine waters and their associated ecosystems including limiting the input of pollutants. • Ensure the sustainable use and protection of water resources. • Protect the coastal environment based on an ecosystem approach and taking ecological responsible coastal protection measures
Air and Noise (AN)	<ul style="list-style-type: none"> • Avoid, prevent and reduce air pollution and environmental noise in order to maintain and improve air quality and reduce harmful effects on human health and the environment. • Achieve compliance with relevant CAFÉ and WHO air quality limits and guidelines particularly in urban areas. • Achieve and maintain a ‘Good’ Air Quality Index for Health (AQIH) in Donegal

⁵ SEOs from the SEA ER of the draft Donegal County Development Plan, 2024 2029 and SEA ERs of other concurrent CAPS in preparation; some SEOs were modified following scoping submissions.

⁶ Inserted on foot of submission at consultation by DAERA

Strategic Environmental Objectives in the Draft Donegal County Development Plan 2024 -2030	
Material Assets (MA)	<ul style="list-style-type: none"> • To sustainably develop new and efficiently utilise and (where appropriate) protect existing material assets (e.g. residential, energy, transport, water, wastewater, community, telecoms and land) by promoting compact consolidated growth and efficient land use planning. • Promote the circular economy, reduce waste and increase energy efficiency. • Avoid inappropriate development in areas at risk of current or future flooding and prevent new developments increasing flood risk elsewhere.
Cultural Heritage (CH)	<ul style="list-style-type: none"> • <i>To support adaptive re-use of existing uninhabited and derelict structures where possible opposed to demolition and new build (to promote sustainability and reduce landfill).</i> • Conserve, enhance, ⁷preserve and record architectural and archaeological heritage
Landscape (L)	<ul style="list-style-type: none"> • To protect and manage the landscape (both rural and urban) in a sustainable manner. • Promote and enhance landscape and seascape character at county and local scale through sensitive siting and design

The assessment process highlighted actions with positive environmental effects at strategic scale and also recommended a number of amendments to or new actions to further strengthen the environmental performance of the CAP. Where potential uncertain or negative affects arose, they would be balanced by mitigation and monitoring measures including mitigation measures identified through the SEA, AA assessment processes as well as mitigation measures as appropriate from the County Development Plan 2022 -2028, as the key statutory landuse framework for the plan area.

Based on the evaluation of the plan actions, and application of relevant mitigation measures, the planning and consenting system and consultation with Northern Ireland statutory bodies as appropriate, no significant transboundary effects on the environment at strategic level are identified⁸.

Mitigation measures incorporated into the Donegal County CAP are set out in Chapter 9 of the Environmental Report. They are integrated into the final plan as shown below in Table 1.3.

⁷ Amended on foot of DAERA Scoping submission and replaces SEO in draft Donegal County Development Plan 2024 -2030 which is very similar in intent.

⁸ Statement provided on foot of submission at consultation stage from Department of Agriculture, Environment and Rural Affairs (DAERA), Northern Ireland (with input from Northern Ireland Environment Agency, and Department for Communities Historic Environment Division via Service Level Agreement with DAERA

Table 1-4 SEA and AA Mitigation measures and their inclusion in the Final Donegal County CAP 2024 -2029.

Action	Mitigation
NE3	Increase coastal resilience to the changing climate and support nature based solutions to avoid coastal squeeze and make space for nature.
CR2	Increase climate literacy across the community through education and raising awareness on climate action and nature based solutions that provide co benefits for human health, water and wildlife
CR4	Ensure that all Council funding mechanisms are underpinned by strong carbon proofing requirements.
new action	In implementing this County Donegal Climate Action Plan, ensure compliance with Donegal County Development Plan 2018 - 2024 and superseding plans, local area plan objectives and policies relating to environmental management, the protection of statutory Conservation Areas and ensure compliance with specific environmental management measures relating to this plan. Landuse plans and projects arising from this Climate Action Plan will be underpinned by Strategic Environmental Assessment, Environmental Impact Assessment, Appropriate Assessment, and Ecological Impact Assessments as relevant.
new action	Donegal County Council will take account of any relevant recommendations in the EPA State of Our Environment Report 2024, once published, in implementing the Plan over its lifetime.
new action	Donegal County Council will consider any relevant updated actions, measures or recommendations that may arise in updates to the National Climate Action Plan over the lifetime of the Plan.
BE1.2	Deliver the ongoing public lighting LED Retrofit and Energy Reduction Programme, while having due regard to impact of light used on biodiversity.
BE 4.5	Advocate for the ongoing expansion and improvements to the electricity grid infrastructure within the County to support renewable generation and supply.
BE5.1	Be proactive in providing flood resilience to municipal infrastructure by conducting flood risk assessments and seeking OPW Funding through their Minor Works programme where necessary and applying nature based solutions where possible
BE5.3	Ensure that the design of future municipal infrastructure considers flood resilience applying nature based solutions where necessary and that they do not increase flood risk elsewhere.
NE1.8	Reduce the extent of grass cutting carried out in public spaces, to preserve biodiversity and encourage growth of native plants to be undertaken in line with guidance from the All Ireland Pollinator Plan
NE2.1	Forestry - Work with Coillte to promote and implement appropriate water protection and integration of biodiversity measures in forestry catchments where potential for impact on waterbody (e.g. sediment, pesticides, colour, organic matter and high rainfall events in line with Water Framework Directive objectives.
NE 4.1	Develop a protocol for the application of NBS to Council projects and provide training on same
Cardonagh DZ	
DZ BE	To support the initiatives of the North West Regional Energy Agency to improve energy efficiency, retrofitting, renewable energy technologies, local community-based renewable energy, wildlife and space for nature and circular economy projects for homes, businesses, public buildings and communities .
	With respect to DZ actions, ensure that they are aligned with the conservation objectives for the

Action	Mitigation
	Trawbreaga Bay SPA
	Protect and maintain our freshwater and transitional water systems, in order to achieve the highest possible water quality and achieving Water Framework Directive objectives.
Falcarragh Gort a' Choircé DZ	
DZ BE	To support the initiatives of the North West Regional Energy Agency to improve energy efficiency, retrofitting, renewable energy technologies, local community-based renewable energy, wildlife and space for nature and circular economy projects for homes, businesses, public buildings and communities.
New action	With respect to DZ actions, ensure that they are aligned with the conservation objectives of European Sites in the wider area surrounding Falcarragh Gort a' Choircé
New action	Protect and maintain our freshwater and transitional water systems, in order to achieve the highest possible water quality and achieving Water Framework Directive objectives.

1.3 Draft CAP 2024 -2029 Stage

The draft CAP 2024 -2029, along with the Environmental Report and Natura Impact Statement (NIS) were put on public display and issued to the statutory environmental authorities for a six week period. The Draft Climate Action Plan public consultation process involved several key elements as outlined below.

- Online Public Notice on www.consult.donegal.ie
- Reports available for inspection at all Public Service Centres and The Base Library in Stranorlar.
- Newspaper advertisements in Donegal News and Donegal Democrat In the 9th November 2023 editions.
- Recurring social media posts (Facebook, Twitter, LinkedIn) during the consultation period to promote awareness of the public consultation period.
- PPN engagement.
- Adjoining Local Authority engagement via Online webinar.
- Cross-Border engagement with Derry City and Strabane District Council.
- Notification to Prescribed Bodies.

A total of 20 valid submissions and observations were received.

Where arising from the above submissions, as well as other valid submissions led to proposed changes to the CAP, these were screened for likely significant environmental effects from the SEA and were also subject to screening under the EU Habitats Directive. The respective screening reports can be found in Annex B of the SEA ER and the final NIS.

1.3.1 Approval of the CAP

The SEA process was considered at each stage of the making of the Plan. Having considered the plan and supporting SEA ER and NIS, the Donegal County CAP 2024 -2029 was approved by the Members of Donegal County Council at the 21st February 2024 meeting.

2 Reasons for choosing the CAP as adopted, in light of other reasonable alternatives considered

The alternatives considered in preparing the draft CAP in the first instance related to the strategic approach in how to most effectively facilitate, through policy and/or actions, the implementation of the proposed CAP. The alternatives considered in this regard are set out below:

- Alternative 1 - Prioritise reducing Greenhouse Gas (GHG) emissions from largest GHG emitting sectors in the County to mitigate against climate change impacts.
- Alternative 2 - Adopt a multi-pronged approach and focus on a range of priority areas to mitigate against and adapt to climate change impacts.
- Alternative 3 -: Adopt a multipronged approach - that has a strong community engagement emphasis - and focus on a range of priority areas to mitigate against and adapt to climate change impacts.

A 'Do Nothing' or 'Do Minimum' alternative is not a reasonable alternative in this instance as the preparation of an effective LACAP is a statutory requirement under Section 16 of the Climate Act

2.1.1 Key environmental challenges at plan scale

In addition to the environmental sensitivity map presented in Chapter 4, the following key environmental issues are relevant to the CAP and alternatives under consideration:

- Flood risk;
- Energy efficiency and adaptation to climate change;
- Seeking a meaningful reduction in the growth in demand for private transport;
- Ensuring that land use and transportation planning are integrated;
- Protection of the built and cultural heritage of the area;
- Protection of the environment by minimising waste and pollution;
- Promote the involvement of the local community in decision making and encourage social inclusion.

2.1.2 Climate Hazard Impacts

The key results from the Climate Change Risk Assessment including impacts experienced to date in Donegal County and future risks are summarised below in Figure 2.1

FIGURE 2-1 CLIMATE CHANGE RISK ASSESSMENT IMPACTS EXPERIENCED TO DATE AND FUTURE RISKS



- Recent experiences of **river** and **pluvial flooding** events (e.g., 2017, 2018, 2019 and 2022) have resulted in damages to homes and buildings (e.g. Elm Park, Buncrana), and infrastructure, disruption of transport networks (e.g. Road networks and Sli na Sliante path) and impacts on business (e.g. New Row in Donegal town) and local economy. Projected increases in the frequency of extreme precipitation events will result in increased surface water and riverine flood risk for County Donegal.



- **Coastal erosion** and **coastal flooding** already pose a significant risk for County Donegal and have resulted in temporary inundation of buildings, loss of transport infrastructure, damage to water treatment and wastewater infrastructure. Rising sea levels will increase the rate of coastal erosion and frequency of coastal inundation, resulting in an increased coastal erosion and flood risk for County Donegal.



- **Severe windstorms** are currently experienced on a frequent basis in County Donegal and result in wide-ranging impacts, including disruption to energy supply, communications infrastructure and transport networks. Projections indicate no significant change to this frequency.



- County Donegal experienced both a **heatwave** and **drought** in 2018, with heatwaves also recorded in 2021 and 2022. These events resulted in damage to road surfaces (e.g. boiling tar in Killyclug), increased demand placed on water resources (hosepipe ban) and recreational areas and detrimental impacts on freshwater quality and fish populations. Projected increases in the frequency of heatwaves and drought conditions will mean that events currently experienced on an infrequent basis will become more frequent.



- Recent experiences of **cold spells** and **heavy snowfall** events in 2018 (e.g. Storm Emma) demonstrated the wide range of impacts for County Donegal. These included, amongst others, increase in the frequency of trips and falls, disruption to road networks, power outages and impacts on water resources and on business and local economy. Projected increases in average temperature and decreases in the frequency of snowfall indicate a decrease in the frequency of cold spells, heavy snowfall, and their associated impacts

2.1.3 Preferred alternative

Following the above evaluation and assessment, the preferred strategic alternative for the approach to the CAP 2024 -2029 is Alternative 3. This is based on the following:

- In terms of all SEOs, Alternative 3 is identified as creating most positive interactions as it provides greater environmental performance overall and also allows for a greater environmental gain, than may be achieved through Alternatives 2 and 1.
- In addition, the multi- faceted approach contributes to greater co-benefits by providing for a wider range of environmental effects particularly around nature-based solutions and resource management.
- The inclusion of measures for citizen engagement and awareness raising through the CAP option is also positive for several SEOs.

3 Monitoring Measures

It is proposed, in accordance with the SEA Directive, to base monitoring on a series of indicators which measure changes in the environment, especially changes which are critical in terms of environmental quality, for example water pollution levels. Monitoring will focus on the aspects of the environment that are likely to be significantly impacted upon by the implementation of the CAP.

It is proposed, in accordance with the SEA Directive, to base monitoring on a series of indicators which measure changes in the environment, especially changes which are critical in terms of environmental quality, for example water pollution levels. Monitoring will focus on the aspects of the environment that are likely to be significantly impacted upon by the implementation of the CAP 2024-2029.

The targets and indicators are derived from the Strategic Environmental Objectives (SEOs) presented in Table 1.2. The target underpins the objective whilst the indicators are used to track the progress of the objective and targets in terms of monitoring of impacts. The monitoring programme will consist of an assessment of the relevant indicators and targets against the data relating to each environmental component. Similarly, monitoring will be carried out frequently to ensure that any changes to the environment can be identified.

This Climate Action Plan will be implemented by Donegal County Council. Implementation of the CAP and in turn monitoring and reporting will be pivotal in demonstrating commitment and leadership in climate action at the local level.

A key part of the CAP is the provision of key performance indicators (KPIs) and annual reporting. Therefore, the suggested monitoring table below, whilst adapted for the SEA monitoring prepared for the draft Donegal CDP 2024-2030 should cross reference and integrate the KPIs identified for the CAP 2024 -2029.

These will be used in annual reports to inform the performance of the local government sector on climate action, as part of the local government DECA 2030 Strategy. In accordance with part 3(w) of the Local Authority Climate Action Charter, Donegal County Council will report annually to the Department of the Environment, Climate and Environment on progress on climate action at local level as part of the delivery of the national climate objective. Progress on all actions will be reported via a reporting tool developed by CARO.

Key implementation and reporting activities that Donegal County Council will undertake are:

1. **Planning for Implementation:** Devising an approach for the implementation of actions on an annual basis.
 2. **Tracking and reporting progress through Key Performance Indicators:** Development and inclusion of plan level KPIs to track, measure and report on progress.
- Please see Table 3.1 overleaf for the monitoring measures.

Table 3-1 SEA Monitoring from Draft Donegal County Development Plan 2024 -2030

Environmental Category	Targets/Thresholds (e.g. Good Water Quality Status)	Indicators (e.g. WFD Water Quality Status)	Monitoring Agency (e.g. DCC, NPWS etc)	Monitoring Frequency (e.g. Annual)	Remedial Actions
Biodiversity	Maintain or restore of favourable conservation status of the Qualifying Interests of all Natura 2000 sites. (Article 2 of Habitats Directive Refers)	Status and Trends of Qualifying Interests (Habitats and Species) related to Natura 2000 sites affected by the CDP 2024 detailed in reports and conservation assessments prepared under Article 17 of the Habitats Directive.	NPWS	Article 17 Reporting every 6 years	Rigorous assessment of proposed developments and enforcement of planning requirements related to permitted developments within the zone of influence of Natura 2000 sites or likely to impact upon the Qualifying Interests of Natura 2000 sites.
Climate	Contribute toward achievement of International, European and National Greenhouse Gas Emission targets (e.g. 51% reduction in Greenhouse gases by 2030 and a climate neutral economy by 2050)	<ul style="list-style-type: none"> National greenhouse gas emission data. Increase in no. of persons commuting by sustainable travel modes (e.g. public transport walking and cycling). Proportion of new residential units granted within walking (400m) or cycling (800m) distance of public transport or local services. No. of developments permitted within Flood Zones A and B. No. of developments permitted utilising SUDS flood attenuation 	EPA CSO DCC DCC DCC	Annual Ongoing Biennial Biennial Biennial	<ul style="list-style-type: none"> Reduce transport related Greenhouse Gas Emissions by promoting more sustainable modes of transportation through full implementation of transport related elements of plan including: <ul style="list-style-type: none"> Compact growth through strict adherence to the zoning and policy framework within the plan. The provision of a local transport interchange hub. The delivery of a local public transport system. The provision of a local walking and cycling links including intra

Environmental Category	Targets/Thresholds (e.g. Good Water Quality Status)	Indicators (e.g. WFD Water Quality Status)	Monitoring Agency (e.g. DCC, NPWS etc)	Monitoring Frequency (e.g. Annual)	Remedial Actions
		solutions.			<p>neighbourhood links.</p> <ul style="list-style-type: none"> ○ Provision of public electric charging infrastructure. ● Reducing greenhouse gas emissions in new residential and commercial developments through achieving greater energy efficiency in the siting, orientation and design of new developments. ● Carbon sequestration through the provision of tree planting and the retention of existing trees as an integral part of new developments as part of the development management process. ● Rigorous assessment of new development proposals vis-a-vis climate related flood risk (e.g. fluvial, pluvial and coastal). ● Enhanced use of SUDS flood attenuation measures through the development management process.
	Take the requisite measures to maintain the population of the species referred to in Article 1 at a level which corresponds in particular to	Status and trends of bird species related to Natura 2000 sites affected by the CDP 2024 detailed in reports prepared under Article 12 of the Bird Directive	NPWS	Article 12 Reporting every 6 years	Rigorous assessment of proposed developments and enforcement of planning requirements related to permitted developments within the zone of influence of Natura 2000 sites or likely to impact upon the Qualifying Interests of Natura

Environmental Category	Targets/Thresholds (e.g. Good Water Quality Status)	Indicators (e.g. WFD Water Quality Status)	Monitoring Agency (e.g. DCC, NPWS etc)	Monitoring Frequency (e.g. Annual)	Remedial Actions
	<p>ecological, scientific and cultural requirements, while taking account of economic and recreational requirements, or to adapt the population of these species to that level. (Article 2 of Bird Directive refers)</p> <p>Preserve, maintain or re-establish a sufficient diversity and area of habitats for all the species of birds referred to in Article 1 of the Bird Directive. (Article 3 of Bird Directive refers).</p>	Irish Wetland Bird Survey (I-WeBS) Results in relation to bird species constituting the qualifying interests in Natura 2000 sites.			2000 sites.
	Protect the habitat and species of Ramsar Sites, Nature Reserves Natural Heritage Areas, and proposed Natural Heritage Areas.	Overall extent of woodland habitat and diversity of species within Ramsar Sites, Nature Reserves Natural Heritage Areas, and proposed Natural Heritage Areas	NPWS and DCC	Biannual	<ul style="list-style-type: none"> Rigorous assessment of proposed developments and enforcement of planning requirements related to permitted developments to ensure that do not negatively impact on Ramsar Sites, Nature Reserves Natural Heritage Areas, and proposed Natural Heritage Areas.
	Compliance with the Pollution Reduction Programme for the Designated Shellfish Areas	<ul style="list-style-type: none"> WFD Waterbody Status for rivers, lakes, transitional and coastal water bodies. Annual Environment Reports for Uisce Éireann WWTPs. DCC compliance data arising 	EPA and DCC	<p>Every 5 Years</p> <p>Annual</p> <p>Ongoing</p>	<ul style="list-style-type: none"> Collaborate with Uisce Éireann to ensure compliance with WWTP Wastewater Discharge Licence Emission Limit Values. Rigorous assessment of proposals for domestic WWT systems vis-a-vis EPA Code of Practice Wastewater Treatment Systems for

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		<p>from the National Inspection Plan for Domestic Wastewater Treatment Systems.</p> <ul style="list-style-type: none"> Information from DCC Environment Section with regard to compliance with Section 4 Wastewater Discharge Licences. Quality of shellfish Growing Areas as reported by DEHLG. 			<p>Single Houses.</p> <ul style="list-style-type: none"> Ensure compliance with relevant Water Pollution legislation vis-a-vis domestic WWT systems through DCC environment section. Ensure compliance with Commercial Wastewater Discharges Licences to Groundwater issued under Section 4 of the Water Pollution Act through DCC environment section.
	<p>Maintain or Restore the favourable conservation status of the Freshwater Pearl Mussel of all affected Natura 2000 sites.</p> <p>Compliance with Sub-Basin Management Plan Catchment Plans for Freshwater Pearl Mussel.</p> <p>Compliance with the measures detailed in the River Basin Management Plan.</p>	<p>Freshwater Pearl Mussel status and Trends detailed in reports and conservation assessments prepared under Article 17 of the Habitats Directive.</p>	NPWS	Every 5 Years	
	<p>Ensure conservation of species protected under the Wildlife Act 1976(as amended)</p>	<p>Species data available on the National Biodiversity Data Centre website: https://www.biodiversityireland.ie/</p>	Heritage Council, Department of Housing, Local	Ongoing	<p>Rigorous assessment of proposed development and enforcement of planning requirements/conditions related to permitted developments in relation to species Protected Under the Wildlife Act.</p>

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			Government and Heritage		
	Conserve and restore biodiversity and ecosystem services in the wider countryside and the marine environment in accordance with 4 th National Biodiversity Action Plan	Species data available on the National Biodiversity Data Centre website: https://www.biodiversityireland.ie/	Heritage Council, Department of Housing, Local Government and Heritage	Ongoing	Ensure minimal impact on existing biodiversity and provision of additional biodiversity assets through the rigorous protection of biodiversity in the development management and planning enforcement systems.
Population and Human Health	Increase population in Donegal in accordance with growth projections set out in the NPF Implementation Roadmap.	Census Results for Donegal	CSO	Every 5 Years	<ul style="list-style-type: none"> • Ensure full implementation of the Housing for All Plan at the local level including as appropriate the utilisation of site activation measures (e.g. Compulsory Purchase Orders).
	Growth in employment opportunities	Employment Growth	CSO	Monthly	<ul style="list-style-type: none"> • Ensure delivery of key transport infrastructure projects (e.g. TEN-T PRIPD, sustainable and active travel projects in settlements) • Ensure implementation of key urban regeneration projects. • Collaborate with Uisce Éireann to ensure delivery of the requisite Water and Wastewater infrastructure to facilitate new

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					<p>development.</p> <ul style="list-style-type: none"> Review spatial allocation of residential and general employment lands.
	Promotion of Social Inclusion and reduction in social deprivation.	<ul style="list-style-type: none"> Mix of housing types, tenures, densities, and size (including proportion of social and affordable housing) in newly permitted developments. Distance from newly permitted residential areas to local services (e.g. schools, neighbourhood centre, healthcare facilities etc). 	DCC and Department of Housing,	Annual	<ul style="list-style-type: none"> Ensure appropriate mix of housing types, tenures densities and sizes (including the provision of social and affordable housing) is provided in suitably located residential areas through the Development Management process. Ensure deliver of the Housing For All plan at the local level including provision of social and affordable housing projects. Utilise state funding mechanisms such as the Buy and Renew Scheme to refurbish vacant housing for social housing use.
	Growth in active travel	Proportion of people walking and cycling to work/school etc in Donegal.	DCC, CSO		Ensure delivery of walking and cycling infrastructure within settlements.
	Compliance with the European Drinking Water Directive.	EPA Annual Drinking Water Quality Reports	EPA	Annual	Collaborate with Uisce Éireann with regard to delivering the infrastructure necessary to improve drinking water supplies.
	Limit Noise Pollution	Noise Mapping prepared for the Draft Donegal Noise Action Plan 2018-2023.	DCC	Every 5 Years	Ensure full implementation of the measures contained in the Draft Donegal Noise Action Plan 2018-2023 as appropriate and where practicable.

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	Air Quality	See Section on Air Quality			
	Water Quality	See Section on Water Quality			
Soil	To Protect Soils and Geology	EPA/Teagasc Soil Mapping Project. Geological Heritage Sites	Teagasc, Geological Survey of Ireland		Ensure minimal impact on soils and geology through rigorous assessment of new development proposals within the development management system.
Water	<ul style="list-style-type: none"> Compliance with the Water Framework Directive in respect of surface waters, transitional bodies and ground water including achieving 'good' status in all waters and otherwise ensuring that water quality does not deteriorate. Compliance with the Emission Limit Values for the Wastewater Treatment Plants Compliance with individual Commercial Wastewater Discharge Licences to Groundwater issued under Section 4 of the Water Pollution Act 1977. 	<ul style="list-style-type: none"> Water Framework Directive Surface Water and At-Risk Status for rivers, lakes, transitional and coastal water bodies. Annual Environment Reports for WWTPs. DCC compliance data arising from the National Inspection Plan for Domestic Wastewater Treatment Systems. DCC Compliance data with regard individual Commercial Wastewater Discharge Licences to Groundwater issued under Section 4 of the Water Pollution Act 1977. Upgrading of existing and provision of new Wastewater Treatment Plants. 	EPA and DCC Uisce Éireann DCC DCC	Every 5 Years Annual Ongoing Ongoing	<ul style="list-style-type: none"> Collaborate with Uisce Éireann to ensure compliance with WWTP Wastewater Discharge Licence Emission Limit Values. Rigorous assessment of proposals for new domestic and commercial independent WWT systems vis-a-vis relevant EPA Code of Practices. Ensure compliance with relevant Water Pollution legislation vis-a-vis existing domestic WWT systems through DCC environment section. Ensure compliance with individual Commercial Wastewater Discharge Licences to Groundwater issued under Section 4 of the Water Pollution Act 1977 through DCC environment section. Review approval of further independent WWT systems for commercial premises.

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Air	<ul style="list-style-type: none"> Compliance with the Ambient Air Quality and Cleaner Air For Europe (CAFE) Directive including associated limit values for specific pollutants (e.g. PM_{2.5}, PM₁₀ and SO₂) Compliance with the WHO Air Quality Guidelines for specific pollutants 	<ul style="list-style-type: none"> Air Quality Index for Health (AQIH) rating for the Letterkenny and Buncrana Air Quality Monitoring station. PM_{2.5}, PM₁₀ and SO₂ emission levels as measured at the Air Quality Monitoring station. 	EPA	Ongoing	<ul style="list-style-type: none"> Reduce PM pollution by ensuring full implementation of the Smokey Coal ban including fuel supply, distribution and use of fuels through the DCC Environment Section. Reduce transport related air pollution by promoting more sustainable modes of transportation through full implementation of transport related elements of plan including: <ul style="list-style-type: none"> Compact growth through strict adherence to the zoning and policy framework within the plan. The provision of a local transport interchange hub. The delivery of a local public transport system. The provision of a local walking and cycling links including intra neighbourhood links. Provision of public electric charging infrastructure.
Climate	<ul style="list-style-type: none"> Contribute toward 	<ul style="list-style-type: none"> National greenhouse gas 	EPA	Annual	<ul style="list-style-type: none"> Reduce transport related Greenhouse Gas

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	<p>achievement of International, European and National Greenhouse Gas Emission targets (e.g. 51% reduction in Greenhouse gases by 2030 and a climate neutral economy by 2050)</p>	<p>emission data.</p> <ul style="list-style-type: none"> • Increase in no. of persons commuting by sustainable travel modes (e.g. public transport walking and cycling). • Proportion of new residential units granted within walking (400m) or cycling (800m) distance of public transport or local services. • No. of developments permitted within Flood Zones A and B. • No. of developments permitted utilising SUDS flood attenuation solutions. 	<p>CSO</p> <p>DCC</p> <p>DCC</p> <p>DCC</p>	<p>Ongoing</p> <p>Biennial</p> <p>Biennial</p> <p>Biennial</p>	<p>Emissions by promoting more sustainable modes of transportation through full implementation of transport related elements of plan including:</p> <ul style="list-style-type: none"> ○ Compact growth through strict adherence to the zoning and policy framework within the plan. ○ The provision of a local transport interchange hub. ○ The delivery of a local public transport system. ○ The provision of a local walking and cycling links including intra neighbourhood links. ○ Provision of public electric charging infrastructure. <ul style="list-style-type: none"> • Reducing greenhouse gas emissions in new residential and commercial developments through achieving greater energy efficiency in the siting, orientation and design of new developments. • Carbon sequestration through the provision

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					<p>of tree planting and the retention of existing trees as an integral part of new developments as part of the development management process.</p> <ul style="list-style-type: none"> • Rigorous assessment of new development proposals vis-a-vis climate related flood risk (e.g. fluvial, pluvial and coastal). • Enhanced use of SUDS flood attenuation measures through the development management process.
Material Assets	<ul style="list-style-type: none"> ○ Delivery of strategic road projects (e.g. TEN-T PRIPD). ○ Delivery of new walking and cycling and public transport infrastructure including a local transport hub. ○ Delivery of key urban regeneration projects (e.g. SEED Project, Empowering Buncrana) ○ Delivery new of public and private housing units 	<ul style="list-style-type: none"> ○ Progress on strategic road projects (e.g. TEN-T PRIPD) ○ Progress on new walking and cycling and public transport infrastructure ○ Completion of key urban regeneration projects (e.g. SEED Project, Empowering Buncrana) ○ No. of new of public and private housing units completed. ○ No. and floor space of new retail 	DCC, OPW, TII and NWRA	Ongoing	<ul style="list-style-type: none"> ○ Collaborate with strategic partners (e.g. TII, Department of Transport etc) to ensure full delivery of strategic roads projects. ○ Collaborate with strategic partners (e.g. National Transport Authority, Department of Transport) to ensure delivery of new walking and cycling and public transport infrastructure. ○ Utilise funding streams such as the Urban Regeneration and Development Fund to ensure delivery of key urban regeneration projects. ○ Ensure full implementation of the Council's public housing programme including

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	<p>completed in line with growth ambition detailed in the Core Strategy.</p> <ul style="list-style-type: none"> ○ No. and floor space of new retail and commercial developments. ○ Reduction in retail and commercial vacancy levels. ○ Extension of the water and wastewater infrastructure to poorly or unserved areas ○ Provision of new green infrastructure ○ Delivery of the Flood Relief schemes. ○ Reduction in flood damage to buildings and infrastructure. 	<p>and commercial developments.</p> <ul style="list-style-type: none"> ○ Retail and commercial vacancy levels. ○ Upgrading of existing and provision of new Wastewater Treatment Plants. ○ Completion of the Flood Relief Scheme. ○ No. of buildings and infrastructure assets damaged by flooding. 			<p>collaborating with the Department of Housing.</p> <ul style="list-style-type: none"> ○ Collaborate with private developers in relation to the provision of new private housing development including the provision of enabling infrastructure. ○ Collaborate with Uisce Éireann in relation to the upgrading and provision of water and wastewater infrastructure to facilitate new residential and commercial development. ○ Collaborate with strategic partners to ensure delivery new green infrastructure. ○ Collaborate with strategic partners (e.g. OPW) to ensure delivery of Flood Relief Schemes.
Cultural	<ul style="list-style-type: none"> ○ Protect and preserve 	<ul style="list-style-type: none"> ○ No. and condition of structures 	DCC,	Ongoing	<ul style="list-style-type: none"> ○ Utilise built heritage funding (e.g. Built

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Heritage	<p>architectural heritage including structures on the Record of Protected Structures, vernacular and historic structures.</p> <ul style="list-style-type: none"> ○ Protect and enhance the Cathedral Quarter Architectural Conservation Area. ○ Protect and enhance the integrity of Archaeological Monuments. 	<p>on the Record of Protected Structures and other vernacular and historic structures within Donegal.</p> <ul style="list-style-type: none"> ○ No. and condition of historic structures within the Cathedral Quarter Architectural Conservation Area. ○ No. and condition of archaeological monuments within Donegal. 	Department of Housing, Local Government and Heritage		<p>Heritage Investment Scheme and Historic Structures Fund) to maintain and improve the condition of existing built heritage.</p> <ul style="list-style-type: none"> ○ Ensure compliance of new developments proposals with built heritage protection policies of the plan through the development management process. ○ Expeditious use of the planning enforcement system to prevent unauthorised loss of built and archaeological heritage.
Landscape	To protect and manage the local landscape including landscape and visual features elements and characteristics of specific relevance to Donegal	Impact of new developments on landscape and visual features elements and characteristics.	DCC	Biennial	<ul style="list-style-type: none"> ○ Ensure rigorous assessment of development proposals in Especially High Scenic Amenity and High Scenic Amenity areas. ○ Ensure compliance with the zonings objective of areas zoned Open Space and Recreation. ○ Review zonings on lands which spatially interact with key landscape and visual features, elements and characteristics as necessary.

