



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

**Strategic Environmental
Assessment (SEA)
Scoping Issues Paper for the**

**Review of the County Donegal
Development Plan 2018-2024 (as
varied) and Preparation of a New
County Donegal Development Plan
2024-2030.**

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1.2 SEA GUIDANCE

The SEA methodology for the proposed Plan Review will be based on Legislative Requirements, and Guidelines including the “Strategic Environmental Assessment, Guidelines for Regional Authorities and Planning Authorities (March 2022)”, and Environmental Protection Agency (EPA) guidance.

1.3 SCOPING STAGE

The main objective of the Scoping Stage is to identify the key environmental issues that may arise as a result of implementing the new County Donegal Development Plan 2024-2030 so that they may be addressed appropriately in the Environmental Report. There are a number of tasks at this stage:

- Decide on the environmental issues to be assessed.
- Gather and report on relevant international, national and local plans, objectives and environmental standards that may influence or impact on the proposed County Plan Review
- Develop draft environmental objectives, indicators and targets to allow for the evaluation of impacts.

The output of this process is the Scoping Issues Paper, which will inform and generate comment from statutory consultees and relevant stakeholders about the key environmental issues and the key elements of the County Development Plan.

Similarly the Scoping Stage also allows input from the environmental authorities and relevant stakeholders on the AA process. As part of this scoping exercise, and pursuant to Section 3 (1) – (3) of the Planning and Development Act 2000 (as amended) and Article 13D of the Planning and Development Regulations 2001 (as amended), this report will be circulated to the following statutory bodies as prescribed under Article 13A(4) of said Regulations:

- Environmental Protection Agency (EPA);
- Minister of Housing, Planning and Local Government;
- Minister of Agriculture, Food and the Marine.
- Minister of Communications, Climate Change and Natural Resources.
- Minister of Arts, Heritage, Regional, Rural and Gaeltacht Affairs.
- Any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan – in this case:
 - Consultation with adjoining Counties Leitrim and Sligo
 - Transboundary consultation with Planning Service Northern Ireland
 - Fermanagh & Omagh District Council,
 - Derry City & Strabane District Council
 - Causeway Coast and Glens Borough Council
 - Transboundary consultation with Northern Ireland Environment Agency

2 THE GEOGRAPHIC AREA

The proposed County Donegal Development Plan 2024-2030 relates to the entire geographical area of County Donegal, see figure below. There is however the potential for impacting upon neighbouring counties Leitrim and Sligo, and transboundary counties, Derry, Tyrone and Fermanagh.

Figure 2: Map of County Donegal



Source: www.osi.ie

3 THE NATURE OF THE COUNTY DONEGAL DEVELOPMENT PLAN 2024-2030 and ITS INTENDED LIFESPAN

3.1 THE NATURE OF THE COUNTY DONEGAL DEVELOPMENT PLAN 2024-

The County Donegal Development Plan 2024-2030 will be the principal statutory land use plan for the County and will set out a vision for the future growth and development of the county over a 6-year period from 2024-2030. This spatially based strategic framework shall seek to manage and co-ordinate sustainable land use in the County.

3.2 THE PLANNING HIERARCHY FOR THE COUNTY DONEGAL DEVELOPMENT PLAN REVIEW

Figure 3 demonstrates the context of the County Donegal Development Plan relative to other plans and programmes that have been adopted at National, Regional and County level. In addition, the new County Development Plan must have due regard to all relevant environmental protection standards and legislation – the full suite of all relevant legislation, programmes and standards will be contained in the Environmental Report.

Fig 3: National Planning Hierarchy



3.3 THE LIKELY SCALE, NATURE AND LOCATION OF DEVELOPMENT WITHIN THE AREA DURING THE LIFETIME OF THE PLAN

The County Donegal Development Plan shall provide a framework for the sustainable growth of the whole of County Donegal over a 6-year period from 2024-2030 and beyond. It is a statutory land use plan of a strategic nature that falls

below a hierarchy of national legislation, national guidelines, and regional strategies at a higher level, and above a hierarchy of local and lower tier plans and strategies at a sub-county level. The nature and scale of potential developments along with their use and location shall be governed by a set of objectives and policies in the plan; the nature and scale of a county plan is such that it is not possible to gauge the type/nature of development that shall be proposed but the County Plan shall provide the necessary structure to appropriately consider potential sustainable development. In addition, the plan shall spatially identify the most appropriate locations for development, including housing and infrastructure as examples identified using an evidenced based approach and established in-house GIS expertise.

4 POSSIBLE ENVIRONMENTAL EFFECTS ARISING FROM THE IMPLEMENTATION OF THE PLAN

Possible Environmental effects arising from the implementation of the Plan will be considered under the following headings (1-11) through the Environmental Report:

1. Biodiversity, Flora and Fauna
2. Population and Human Health
3. Soils, Geology and Hydrology
4. Water
5. Climate Change and Air Quality
6. Marine and Coastal Resource
7. Material assets
8. Cultural, Archaeological and Architectural Heritage
9. Landscape
10. Inter-County and Transboundary Issues
11. Interrelationships between the foregoing

Owing to the myriad of elements within a County development Plan, and the multiple potential impacts (both positive and negative) in the above listed environmental headings, this Scoping Issues Paper does not contain detailed analysis at this early stage in the process.

4.1 Biodiversity, Flora and Fauna

It is of paramount importance that the impact of development on habitats and species is minimal; in particular the EU protected Natura 2000 sites (SPAs and SACs) as well Nationally protected sites, NHAs, pNHAs, and other habitats of ecological and biodiversity importance.

Objectives and policies must be carefully planned and managed so as not to compromise the integrity of any sites, that could potentially result in subsequent impacts to biodiversity. The tables below set out baseline data of areas upon which possible environmental effects could arise from the implementation of the Plan (Sections 4.1-4.9)

BIODIVERSITY, FLORA AND FAUNA	
Special Areas of Conservation; and Special Protection Areas (Natura 2000 sites)	<p>Surveillance information for Ireland's Natura sites is contained in: <i>'The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report.'</i> The following information in relation to the current state of these sites in Donegal has been extracted from this document.</p> <p>44 Annex I Habitats as listed in the Habitats Directive are represented within SACs in County Donegal;</p> <p>Current State of SAC's in Donegal (by reference to Protected Habitats and Species)</p>

Status	No. of Habitats
Favourable	4
Inadequate	21
Bad	19

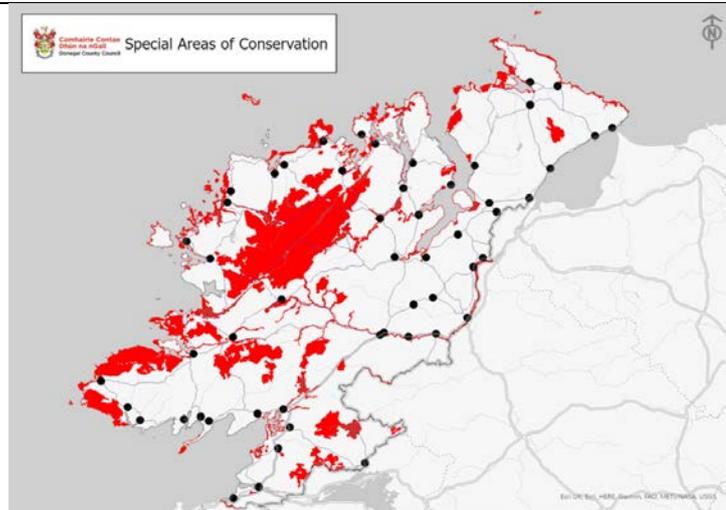
Source: Extracted from *The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report, 2019.*

Similar information is not available for SPAs.

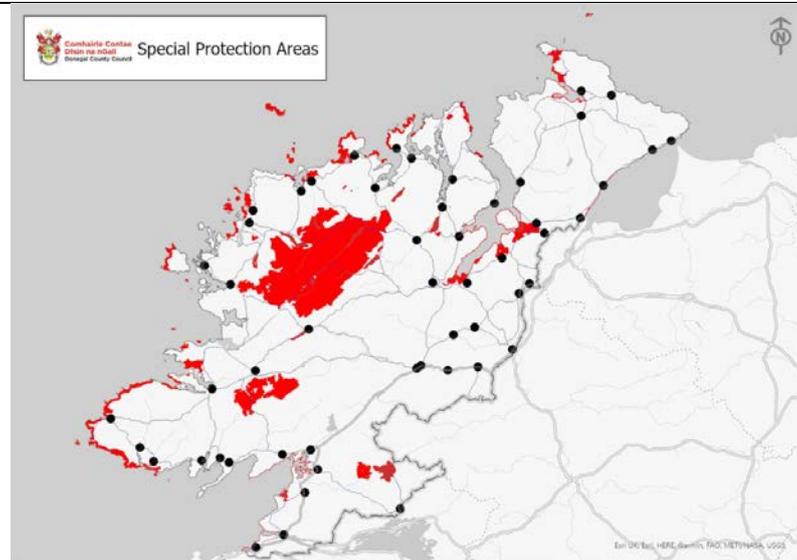
There is no information available on the status of the Natura 2000 sites buffer areas.

A full schedule of the designated Natura 2000 sites. Figures below show the extents of the respective SAC and SPA 'portfolios' both within and without the jurisdiction of the Planning Authority.

Special Areas of Conservation (SACs)



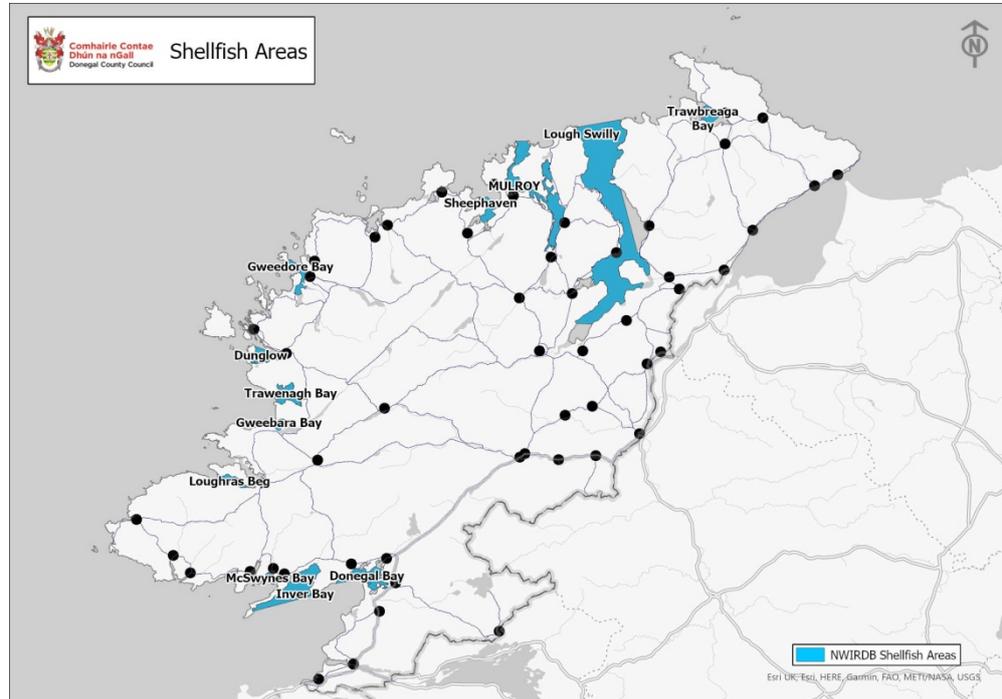
Special Protection Areas (SPAs)



Shellfish Waters

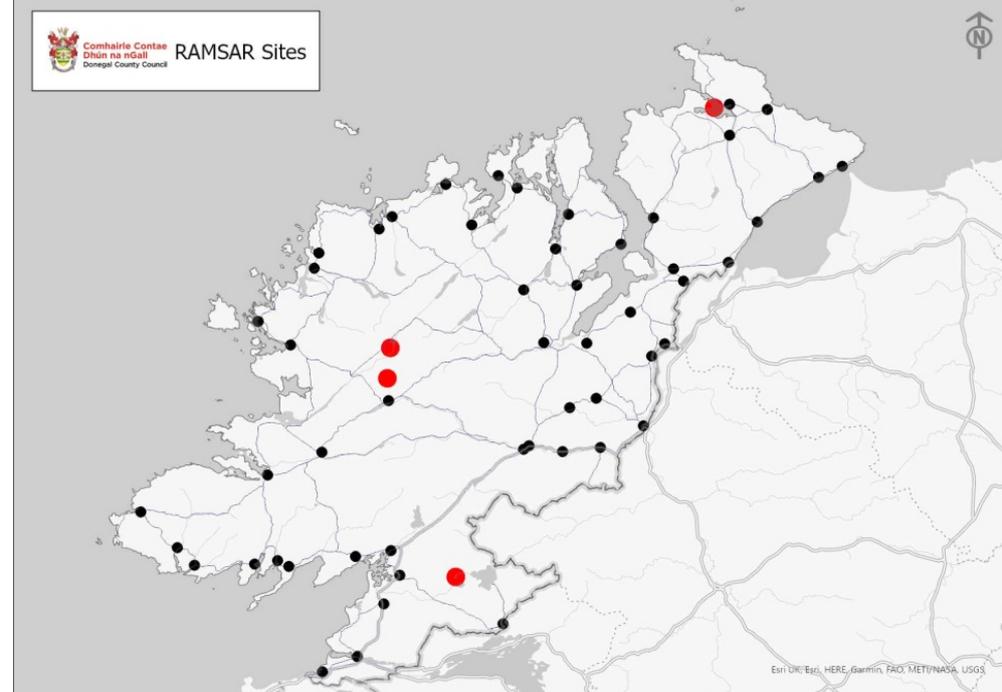
There are 12 such designated waters at various locations along the coastline.

The most recent information available is from 2021 Characterisation Reports published/updated by the Department of Housing, Heritage and Local Government in March, 2021. These reports indicated that 7 of the 12 'sites' has 'no key pressures', 4 were the subject of potential risks arising from wastewater systems and agriculture, 1 was subject to risks from wastewater systems only, and 1 from both wastewater systems and port activities.



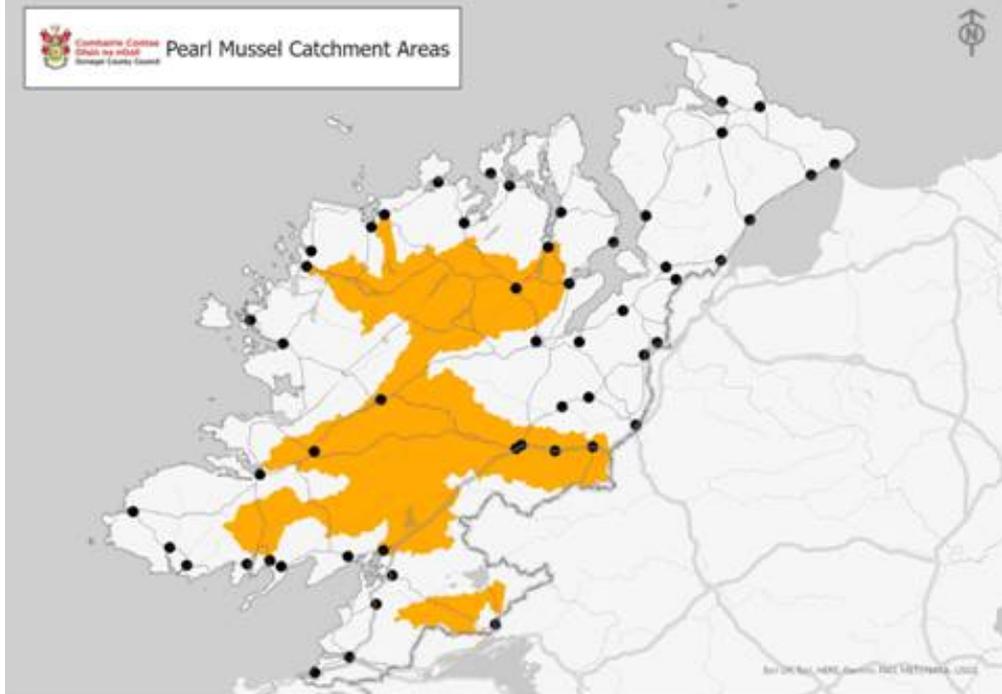
Wetlands of significant value for nature.

4 sites in the north, west and south of the County at: Meenachullion Bog; Pettigo Plateau Code; Trawbreaga Bay; and Lough Barra Bog, collectively covering a total of 2,273 hectares.



Freshwater Pearl Mussel Populations and Catchments

There are 6 extensive populations, and 7 other known populations in Donegal contained within, 5 of the County's SACs



Protected Habitats and Species

In 2019, the NPWS prepared a detailed assessment of a total of 68 protected species listed in Ireland. Of these 68 species, 40 are found within Special Areas of Conservation in Donegal. The overall status at a national level of the 40 species found in Donegal SACs is set out in the table below.

National Status of Protected Species Found Within SAC's in Donegal

Status	No. of Species
Favourable	28
Inadequate	4
Bad	4
Unknown	4

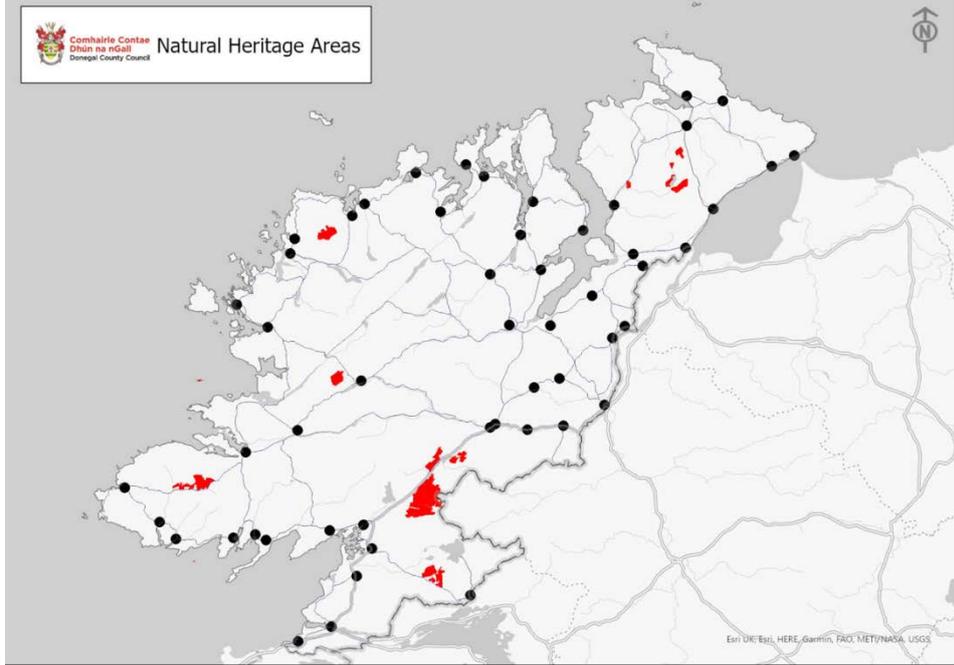
Source: Extracted from 'The Status of EU Protected Habitats and Species in Ireland. Volume 1: Summary Overview. Unpublished NPWS report, 2019.'

Ecological Networks

No information available. Ecological networks are not identified at a County scale and are more appropriately considered in lower level plans/ at application stage.

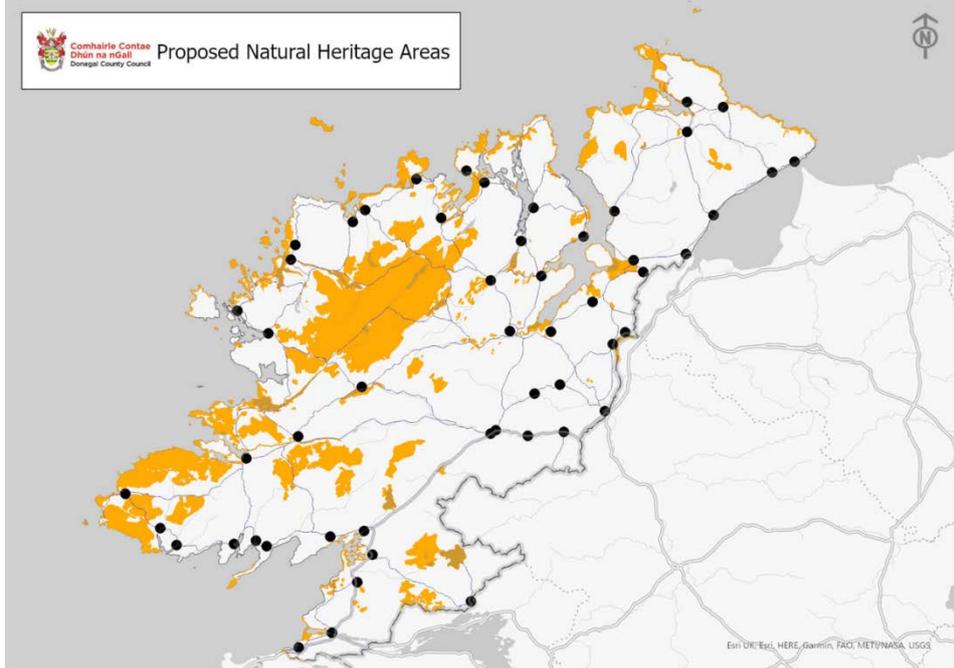
Natural Heritage Areas

There are 14 Natural Heritage Areas throughout the County.

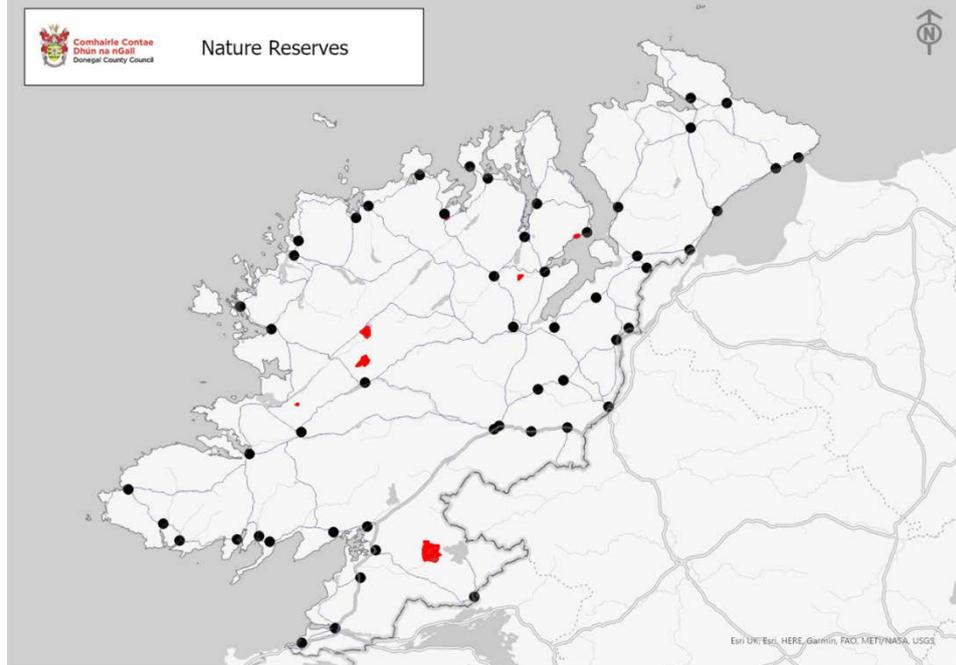


Proposed Natural Heritage Areas

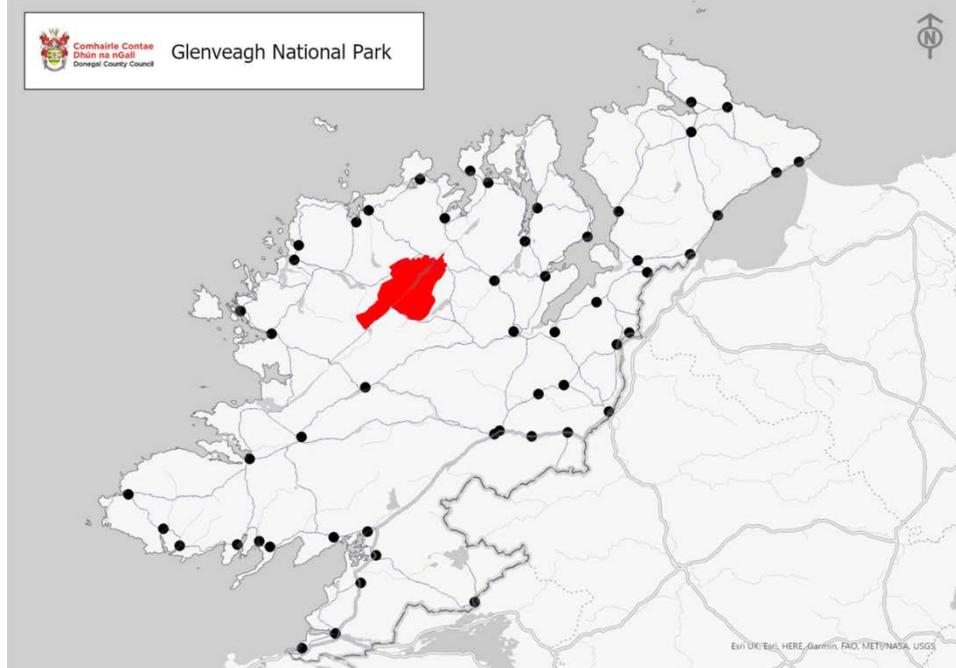
There are 78 sites dispersed throughout the County.

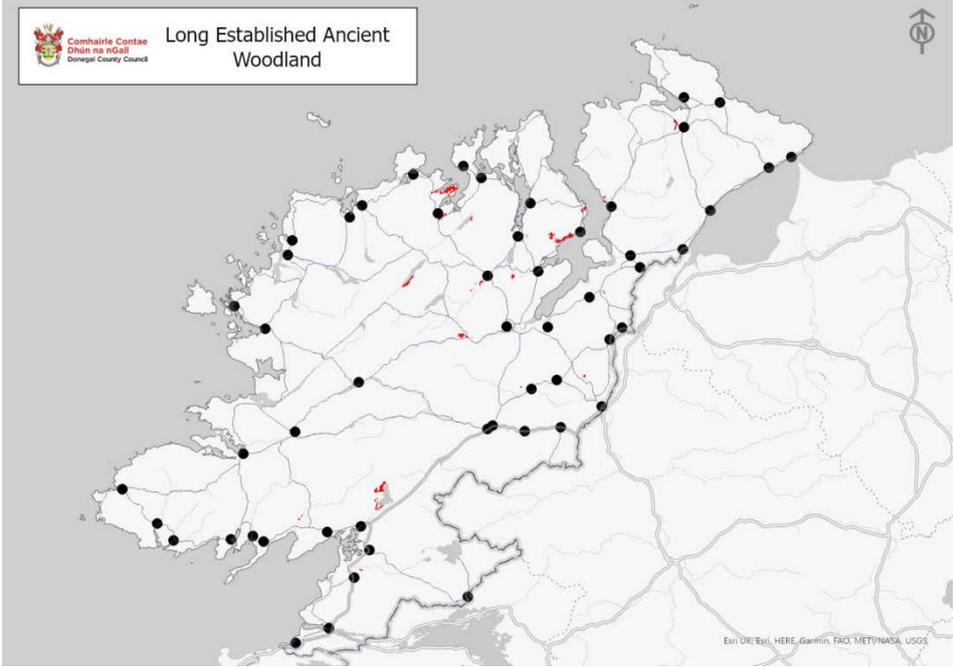
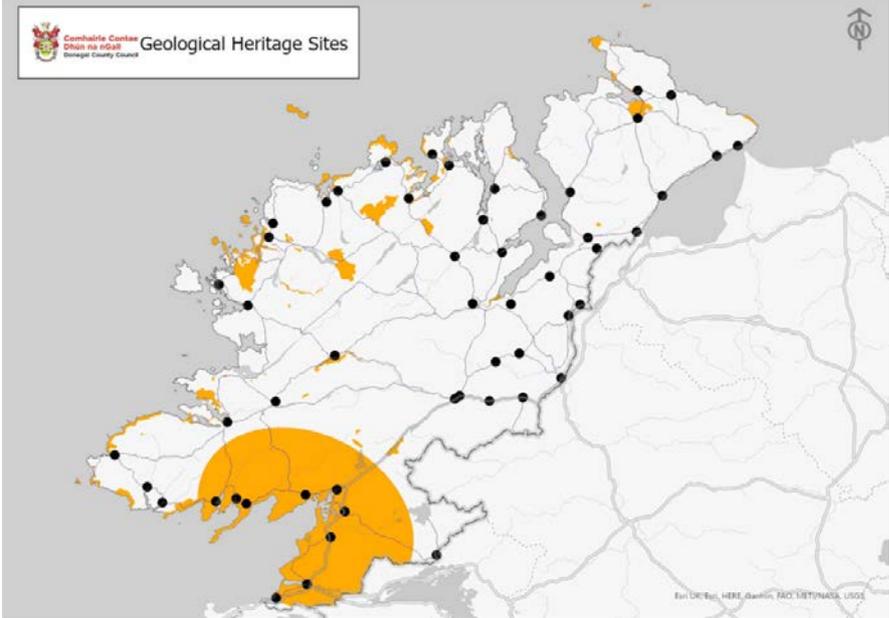


Nature Reserves:
There are 7 designated Nature Reserves and 3 Nature Reserves which are not officially designated.



National Parks
Glenveagh National Park.



<p>Ancient Woodlands</p> <p>There are 5 such woodlands in Donegal identified by NPWS</p>	
<p>Invasive Species</p>	<p>No information available. Location and nature of invasive species are not identified at a County scale and are more appropriately considered in lower level plans/ at application stage.</p>
<p>County Geological Sites: The Geological Heritage Audit of Donegal, 2019 identifies a total of 102 CGS, 22 have been recommended as NHAs.</p>	

4.2 Population and Human Health

Population

The population of County Donegal is 159,200¹ distributed across 24 identified towns and villages, small settlements and the rural area. Various developments could affect the population in different ways and to different extents and these shall be considered in detail in the Environmental Report.

(Sources: Census and DCC GIS)

4.3 Soils, Geology and Hydrology

Soils

Objectives and policies of the County Development Plan have the potential to result in pressures on water quality and soil degradation or replacement, thereby damaging vegetation, hydrology and landscape as well as destroying vital carbon sinks. Consideration of same shall be a key consideration in the Environmental Report

4.4 Water

Donegal is a county with numerous freshwater lakes and rivers, many estuaries and a long coastline including larger river basin systems such as the Finn/Foyle, and large tidal estuaries such as Lough Swilly, Lough Foyle and Mulroy Bay. These water bodies not only act as environmental habitats for flora and fauna, but also provide a source of drinking water and recreational resource for human populations. Groundwaters are also locally important sources of drinking water supply. The protection of such water bodies is therefore a major environmental concern and a priority for the Development Plan.

Similar to its biodiversity richness, Donegal also contains a large number, range and geographical spread of valuable waterbodies. Table 3.1 below identifies the overall number of waterbodies as being 468.

An important sub-group of this overall range of waterbodies is the group of 138 such sites identified as Protected Areas in accordance with the EU Water Framework Directive. These include designated areas: 1.) for the abstraction of water intended for human consumption under Article 7; 2.) for the protection of

¹ www.cso.ie

economically significant aquatic species; 3.) as recreation, including areas designated as bathing waters under Directive 76/160/EEC; 4.) as Nutrient-sensitive areas, including areas designated as vulnerable zones under Directive 91/676/EEC and areas designated as sensitive areas under Directive 91/271/EEC; and for the protection of habitats or species where the maintenance or improvement of the status of water is an important factor in their protection, including relevant Natura 200 sites designated under Directive 92/43/EEC (1) and Directive 79/409/EEC.

A further important sub-group is comprised of those identified as having High Status Waterbody Objectives. The second cycle River Basin Management Plan, 2018 (*) identified high status environmental objectives for 310 waterbodies in the country including 26 in Donegal.

Finally, it should also be noted that there are 85 shared waterbodies between Donegal and Northern Ireland.

Table 3.1: Global Waterbodies Data, Donegal

Overall No. of Waterbodies (*)						Water Framework Directive ANNEX IV Protected Areas of Direct Relevance for Wind Energy (*)						Water Framework Directive High Status Objective Waterbodies			
						Associated With Public Health									
River	Lakes	Trans' Water	Coast. Water	Ground water	Tot	Drink. Water Surface Water bodies	Bath. Water	Sh'fish	Salmon Rivers	Natura (water-based)	Tot	River	Lake	Transit. Waters	Coast. Water
266	110	20	28	44	468	33	21	12	6	56	138	17	7	1	1

[Source: Compiled from the 3rd Cycle Draft Catchment Reports for each of the six River Basin Catchments in Donegal; EPA Catchments, August, 2021] nb excludes information for the Erne Catchment as the vast majority of that catchment is outside of Donegal County Council Jurisdiction.

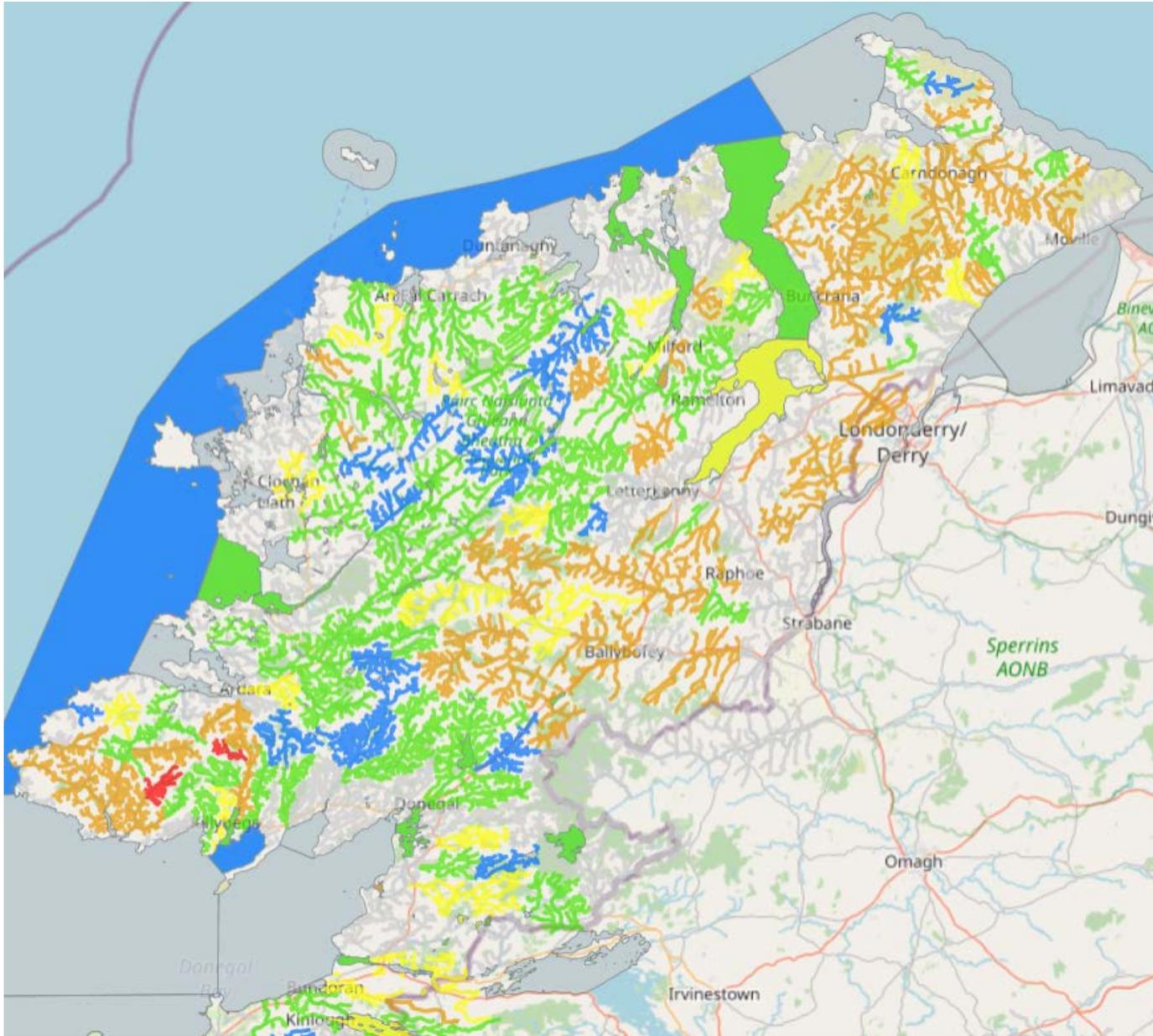


Table 3.2: Current Status of Waterbodies, Donegal

Current Status of Waterbodies (*)						
	High	Good	Moderate	Poor	Bad	Unassigned
Total	26	142	24	70	2	205

[Source: Compiled from the 3rd Cycle Draft Catchment Reports for each of the six River Basin Catchments in Donegal; EPA Catchments, August, 2021] nb excludes information for the Erne Catchment as the vast majority of that catchment is outside of Donegal County Council Jurisdiction.

Table 3.3: Trend in Status of Waterbodies, Donegal

Trend In Status of Waterbodies (*)				
	Improved	Unchanged	Declined	Unassigned
Total	44	178	42	84

[Source: Compiled from the 3rd Cycle Draft Catchment Reports for each of the six River Basin Catchments in Donegal; EPA Catchments, August, 2021] nb excludes information for the Erne Catchment as the vast majority of that catchment is outside of Donegal County Council Jurisdiction.

4.5 Climate Change and Air Quality

Climate Change and Air Quality

Climate change is recognised as one of the biggest threats to the future sustenance of the planet. Potential negative impacts arising from further climate change include impacts on habitats, species, fisheries, aquaculture, tourism, water quality, water safety, flood risk and people. Of increasing concern is the issue of flooding of rivers and flooding at the coast, as well as impacts such as eutrophication which can have devastating impacts on water quality, fish stocks, and human health.

The government is committed to reducing greenhouse gas emissions and meet the target CO2 reductions set by the EU. The Climate Action Plan 2019, sets a goal of reaching net zero carbon emission by 2050 and this shall be a fundamental consideration in the drafting of a new County Development Plan.

There is no evidence of air quality concerns in county Donegal.

4.6 Marine and Coastal Resource

Marine and Coastal Resource

Donegal has 1132km of North Atlantic coastline of great amplitudes hosting a diversity of both marine and terrestrial habitats, flora and fauna. Donegal has:

- 13 Blue Flag Beaches; and
- 5 Green Coast Awards

Development throughout the County has the potential to impact on marine and coastal resources in terms of the development of or near the coast but also factors such as impacts on waterbodies that discharge to the coast.

4.7 Material Assets

Material Assets

The term 'Material Assets' refers to all infrastructure and local services including, transportation, water supply, waste-water treatment and discharge, waste management services, electricity supply, telecommunications etc. Owing to the scale and breadth of material

assets throughout the County, these shall be considered on a strategic basis in the 4 Year Review.

An emerging key issue here relates to vacant and derelict properties as illustrated by the undernoted summary figs. extracted from the NWRA's 'Regional Vacancy and Dereliction Analysis, January, 2022:

- Commercial vacancy Donegal, 2020: 1,219 properties (or 14.2%);
- Vacant and derelict residential stock, 2020: 8,565 properties.

A summary baseline report of, and environmental assessment of potential effects on material assets in the county shall be included in the Environmental Report.

4.8 Cultural Heritage including Architectural and Archaeological Heritage

Developments and associated infrastructural provision, can potentially impact on sites or features of architectural, archaeological, geological or cultural heritage interest. In particular certain developments on or near sites of heritage value have the potential to have a negative impact on the integrity of these sites. An environmental assessment of potential effects on all sites of archaeological, built and cultural heritage throughout the county shall be included in the Environmental Report.

Cultural Heritage including Architectural and Archaeological Heritage

Protected Structures There are currently 385 structures on Donegal County Council's Record of Protected Structures.

Structures of Architectural Heritage Value There are currently 1,656 structures on the National Inventory of Architectural Heritage.

Archaeological Complexes There are currently 29 Complexes protected under the National Monuments Acts 1930-1994.

National Monuments: There are currently 3,504 Monuments protected under the National Monuments Acts 1930-1994.

4.9 Landscape

New development has the potential to affect landscape, including impacts on the natural, built and cultural environment, impacts on the aesthetic landscape and sensitive views, resulting from development as examples.

Landscape designations in current County Donegal Development Plan 2018-2024

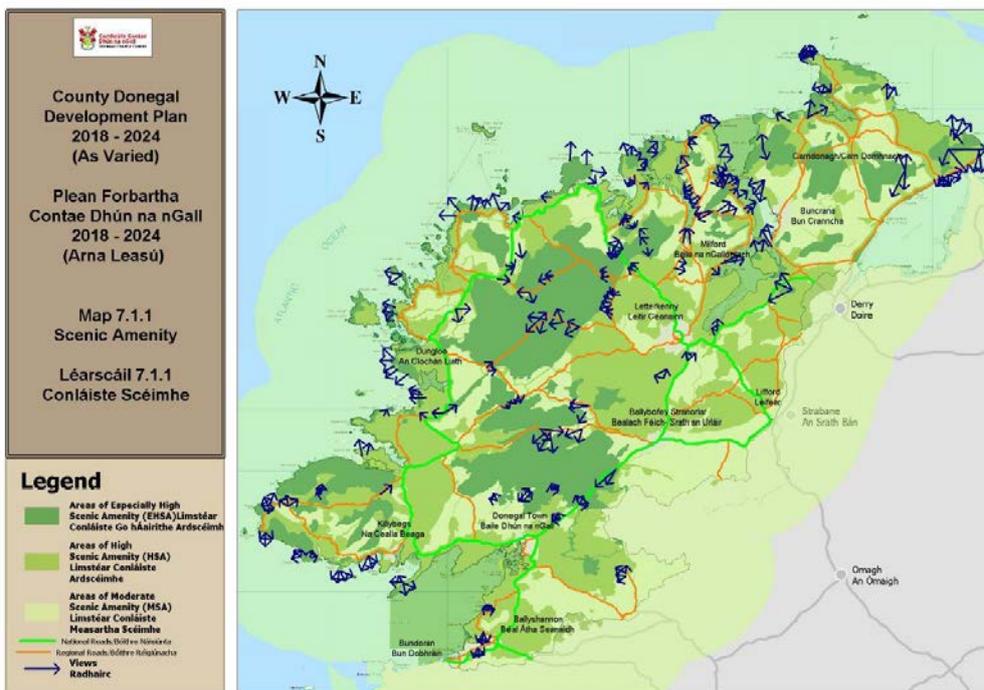
Chapter 7: 'The Natural and Built Heritage' of the CDP categorises the landscape of the County into three layers of value: 'Especially High Scenic Amenity', 'High Scenic Amenity', and 'Moderate Scenic Amenity' areas and identifies these areas in Map 7.1.1: 'Scenic Amenity' (refer Fig. 3.14 below). None of the landscapes have been classified as Low Value. The definitions for each of the areas of landscape value and classification are as detailed below:

Areas of Especially High Scenic Amenity (EHSA): Sublime natural landscapes of the highest quality synonymous with the identity of County Donegal. These areas have extremely limited capacity to assimilate additional development.

Areas of High Scenic Amenity (HSA): Landscapes of significant aesthetic, cultural, heritage and environmental quality that are unique to their locality and are a fundamental element of the landscape and identity of County Donegal. These areas have the capacity to absorb sensitively located development of scale, design and use that will enable assimilation into the receiving landscape and which does not detract from the quality of the landscape, subject to compliance with all other objectives and policies of the plan.

Areas of Moderate Scenic Amenity (MSA) Primarily landscapes outside Local Area Plan Boundaries and Settlement Framework boundaries, that have a unique, rural and generally agricultural quality. These areas have the capacity to absorb additional development that is suitably located, sited and designed subject to compliance with all other objectives and policies of the Plan.

County Donegal Development Plan 2018-2024 (As Varied) Scenic Amenity Map



Source - Donegal County Council
 Poinne - Conláište Contae Dhún na nGall

4.10 INTER-COUNTY AND TRANSBOUNDARY ISSUES

Many of the environmental issues raised in the section above have an inter-county, and cross border (transboundary) dimension. Accordingly, responding to such issues require a coordinated and targeted approach by the many agencies involved in the management of the environment. Of particular note in terms of inter-county and cross border issues include; sensitive landscapes and sites of ecological importance, items and places of cultural heritage, sites of geological interest, water quality, marine and coastal management, and energy supply.

4.11 INTERRELATIONSHIPS BETWEEN THE FOREGOING

The interrelationship between the SEA environmental topics is an important consideration for environmental assessment. The table below sets out anticipated interrelationships between the various environmental topics, which in turn will be addressed in more detail in the environmental report.

Table 1 Interrelationships between Environmental Topics

Component	Biodiversity/Flora/Fauna	Soil/Geo-logy	Water	Air/Climatic Factors	Material Assets	Cultural Heritage	Landscape/Townscape	Population & Human Health
Biodiversity/Flora/Fauna		✓	✓	✓	✓	X	✓	✓
Soil/Geology	✓		✓	✓	✓	X	✓	✓
Water	✓	✓		✓	✓	X	✓	✓
Air/Climatic Factors	✓	✓	✓		✓	X	✓	✓
Material Assets	✓	✓	✓	✓		✓	✓	✓
Cultural Heritage	X	X	X	X	✓		✓	✓
Landscape/Townscape	✓	✓	✓	✓	✓	✓		✓
Population & Human Health	✓	✓	✓	✓	✓	✓	✓	

✓ = Likely interrelationship
 X = No likely interrelationship

5 ALTERNATIVES

The SEA Directive requires that reasonable alternatives be assessed in order to demonstrate how the preferred strategy performs against other forms of action. Alternatives must be developed, described and assessed within the SEA process, with the results presented in the Environmental Report. Alternatives developed are likely to consider:

(i) Business as usual scenario where the CDP remains the same following the review process and no changes are made.

(ii) Scenario with a new County Donegal Development Plan and resultant impacts

Alternatives will be explored further as the process evolves and will be discussed in detail in the Environmental Report.

6 Scope and level of detail of the Environmental Report

The Strategic Environmental Assessment shall be at a County-wide strategic level and shall include the following:

- The legal status of the draft plan, its period of validity, and the geographic area covered (including a map of the plan area and adjacent local authorities, main transport links and main conurbations).
- The extent to which the draft plan incorporates or is guided by strategic objectives from higher level plans or programmes.
- Its objectives and policies.
- The scale, type and location of development envisaged in the area during the life of the plan; and
- It's relationship with other plans or programmes in the area (including land use plans and non-land use planning sectors such as waste management plans, transport plans, water management plans, wind energy strategies), and the extent to which the draft plan will set the strategic context for lower-tier plans, such as Local Area Plans.

7 WHAT HAPPENS NEXT?

The purpose of this report is to identify the likely key environmental issues surrounding the preparation of a new County Donegal Development Plan and thereafter to scope the information to be included in the Environmental Report. The next step is to circulate this report to the prescribed environmental authorities for comment on the scope and level of detail to be included in the Environmental Report.

Therefore, in accordance with Article 13D of the Planning & Development Regulations 2001 (as amended), the prescribed authorities may make a submission or observation in relation to the scope and level of detail of the information to be included in the Environmental Report, within a period of 4 weeks from the date of the accompanying notice. On completion of consultation with the Environmental Authorities, the final scoping report will be prepared

