

# STRATEGIC ENVIRONMENTAL ASSESSMENT SCOPING REPORT

---

FOR THE

## DRAFT SLIGO COUNTY DEVELOPMENT PLAN 2023-2029

**for: Sligo County Council**

County Hall  
Riverside  
Sligo



**by: CAAS Ltd.**

1<sup>st</sup> Floor  
24-26 Ormond Quay Upper  
Dublin 7



**APRIL 2022**

# Table of Contents

<b>Section 1</b>	<b>Introduction and Background .....</b>	<b>1</b>
1.1	Introduction and Terms of Reference .....	1
1.2	Overview of the Draft Plan, SEA and AA Processes .....	1
1.3	Process Detail .....	3
<b>Section 2</b>	<b>Details on the Likely Content of the Draft Plan .....</b>	<b>25</b>
<b>Section 3</b>	<b>Scope of Environmental Baseline Data to be used in the Assessment .</b>	<b>26</b>
3.1	Introduction .....	26
3.2	Biodiversity and Flora and Fauna.....	26
3.3	Population and Human Health.....	27
3.4	Soil.....	28
3.5	Water.....	28
3.6	Air and Climatic Factors.....	29
3.7	Material Assets .....	33
3.8	Cultural Heritage .....	35
3.9	Landscape .....	36
<b>Section 4</b>	<b>Other Issues Relevant to the Scope of the SEA .....</b>	<b>37</b>
4.1	Environmental Issues and Components .....	37
4.2	Guidelines and Legislation .....	37
4.3	Relationship with other plans and programmes .....	38
4.4	Consideration of Potential Significant Environmental Effects .....	38
4.5	Appropriate Assessment and Strategic Flood Risk Assessment .....	38
4.6	Alternatives.....	39
4.7	Mitigation.....	39
4.8	Monitoring .....	39
<b>Section 5</b>	<b>What happens next? .....</b>	<b>40</b>

# Section 1 Introduction and Background

## 1.1 Introduction and Terms of Reference

Sligo County Council intends to review the existing Sligo County Development Plan 2017-2023 (as varied) and prepare new Sligo County Development Plan 2023-2029 under Sections 11 and 12 of the Planning and Development Act 2000 (as amended).

As the Development Plan will cover an area the population of which exceeds 10,000 persons, Strategic Environmental Assessment (SEA)<sup>1</sup> is required by the Planning and Development (SEA) Regulations (as amended) to be undertaken on the Plan.

This SEA Scoping Report communicates and defines the scope of the environmental issues which are to be dealt with by the SEA together with the level of detail to which it is intended to address these issues, as per the SEA Guidelines<sup>2</sup>. It has been informed by SEA consultations with environmental authorities.

## 1.2 Overview of the Draft Plan, SEA and AA Processes

Figure 1.1 provides an overview of the integrated Plan-preparation, SEA, Appropriate Assessment (AA)<sup>3</sup> and Strategic Flood Risk Assessment (SFRA)<sup>4</sup> processes. The preparation of the Draft Plan, SEA, AA and SFRA are taking place concurrently and the findings of the SEA, AA and SFRA will inform the Draft Plan.

Taking into account the scope detailed in this SEA Scoping Report, which has been informed by SEA scoping submissions, environmental impacts will be predicted, evaluated and mitigated. The findings of the assessment will be presented in an SEA Environmental Report that will accompany the Draft Plan on public display as part of the required statutory public consultation. The findings of both the AA and SFRA will be integrated into the SEA Environmental Report. AA and SFRA documents will also accompany the Draft Plan on public display. The SEA will follow elements of Integrated Biodiversity Assessment<sup>5</sup>.

Submissions received following public consultation on the Draft Plan and associated documents will be responded to in the Second Chief Executive's report, with updates made to the SEA and AA documentation where relevant.

Material Alterations, where proposed, will be screened for the need to undergo SEA and AA and full, detailed assessments will be undertaken where required. The SEA and AA documents would accompany the Proposed Material Alterations, if made, on public display. Submissions from that round of public consultations, if needed, would be responded to in the Third Chief Executive's report on public consultation, with updates made to the SEA and AA documentation where relevant.

Any proposed modifications would be examined to ensure that they would not be likely to affect the Natura 2000 network of designated ecological sites and to ensure that they would not be likely to result in significant environmental effects.

When the Plan is adopted, the SEA, AA and SFRA documents will be finalised and SEA Statement, which will include information on how environmental considerations were integrated into the Plan, will be prepared. The Plan will be implemented and environmental monitoring will be undertaken.

---

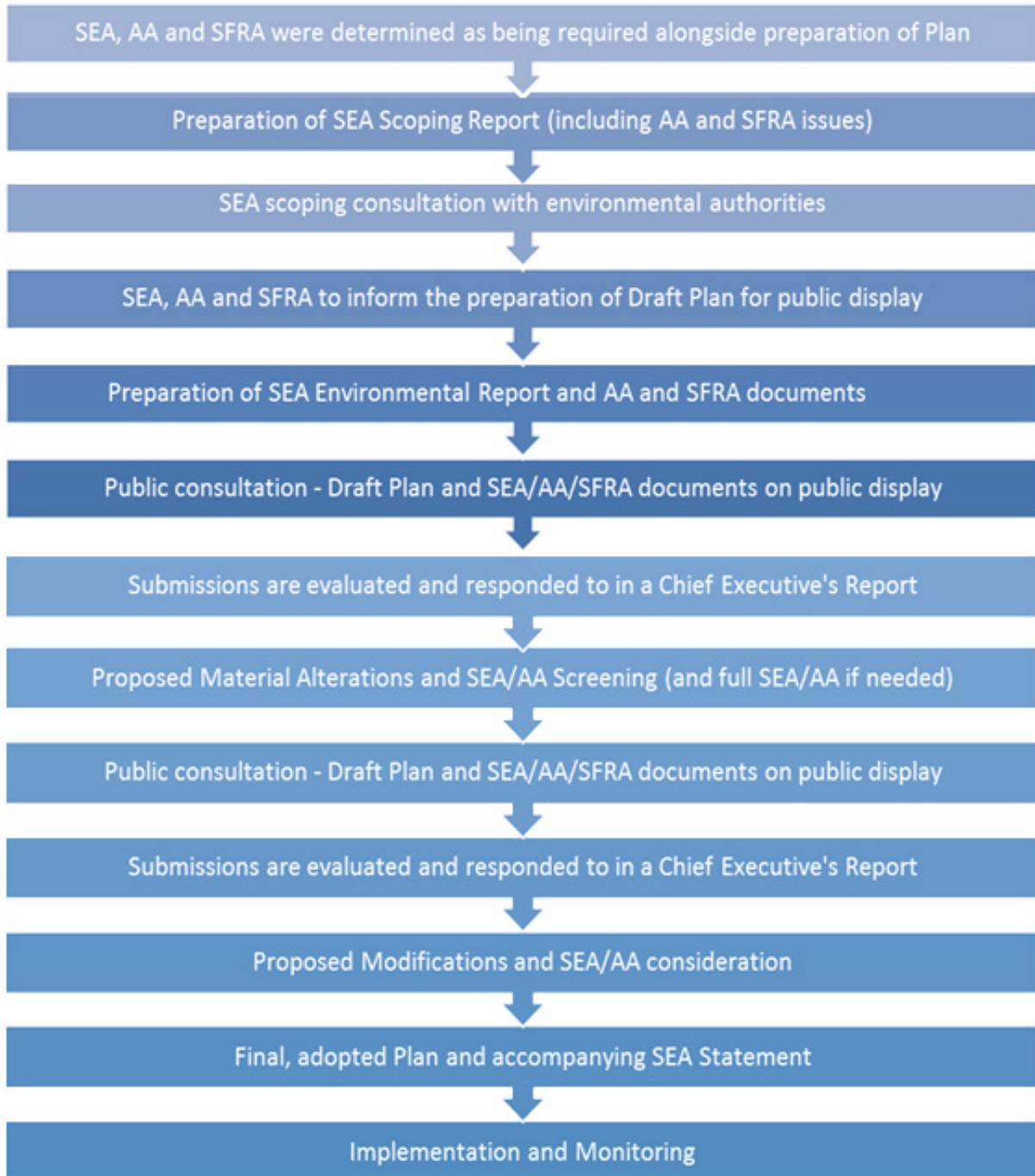
<sup>1</sup> SEA is the formal, systematic evaluation of the likely significant environmental effects of implementing a plan or programme before a decision is made to adopt it.

<sup>2</sup> Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities (Department of Housing, Local Government and Heritage, 2022)

<sup>3</sup> AA is a focused and detailed impact assessment of the implications of a strategic action or project, alone and in combination with other strategic actions and projects, on the integrity of a European site in view of its conservation objectives.

<sup>4</sup> SFRA is an area-wide examination of the risks of flooding to support spatial planning decisions such as the zoning of particular areas for development.

<sup>5</sup> As detailed in the EPA's 2013 Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes: Practitioner's Manual.



**Figure 1.1 Overview of the SEA Process in the Review and Preparation of the County Development Plan (including AA and SFRA processes)**

## **1.3 Process Detail**

### **1.3.1 Legislative Context for SEA**

Directive 2001/42/EC on the Assessment of the Effects of Certain Plans and Programmes on the Environment, referred to hereafter as the SEA Directive, introduced the requirement that SEA be carried out on plans and programmes which are prepared for a number of sectors, including land use planning. The SEA Directive was transposed into Irish Law through the European Communities (Environmental Assessment of Certain Plans and Programmes) Regulations 2004 (Statutory Instrument Number (S.I. No. 435 of 2004) and the Planning and Development (SEA) Regulations 2004 (S.I. No. 436 of 2004). Both sets of Regulations became operational on 21 July 2004. The Regulations have been amended by the European Communities (Environmental Assessment of Certain Plans and Programmes) (Amendment) Regulations 2011 (S.I. No. 200 of 2011) and the Planning and Development (SEA) (Amendment) Regulations 2011 (S.I. No. 201 of 2011).

### **1.3.2 Appropriate Assessment**

Screening for Appropriate Assessment (AA), and possibly subsequent stages of assessment, will be undertaken alongside the preparation and adoption of the Draft Plan. AA is an impact assessment process concerning European sites (which collectively comprise the Natura 2000 network) - these sites have been designated or proposed for designation by virtue of their ecological importance. The Habitats Directive<sup>6</sup> requires, inter alia, that plans and programmes undergo an AA process to establish the likely or potential effects on the integrity of European sites arising from implementation of the Plan. If the effects are deemed to be significant, potentially significant or uncertain, then the Plan must undergo Stage 2 AA.

### **1.3.3 Strategic Flood Risk Assessment**

A Strategic Flood Risk Assessment (SFRA) will also be undertaken alongside the preparation and adoption of the Draft Plan, identifying and assessing flood risk to inform the content of the Plan including policies, objectives and land use zoning. The requirement for SFRA is provided under 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Circular PL 2/2014 (Department of Environment, Community and Local Government).

### **1.3.4 Outcomes of the SEA and AA Processes**

The SEA, AA and SFRA processes will facilitate the integration of environmental considerations into the Plan, including: policies and objectives contributing towards environmental protection and management and the sustainable development; and the integration of environmental considerations into the land use zoning included as part of the Plan.

### **1.3.5 Scoping and consultations with environmental authorities**

As part of the SEA scoping process, environmental authorities<sup>7</sup> specified under the Planning and Development (SEA) Regulations (as amended), were notified that a submission or observation in relation to the scope and level of detail of the information to be included in the SEA Environmental Report can be made to the Council. Submissions were received from the following:

- Environmental Protection Agency;
- Department of Environment, Climate and Communications (one from the Geological Survey Ireland and one from the Waste Policy and Resource Efficiency Division);

<sup>6</sup> Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora

<sup>7</sup> The following authorities were notified: Environmental Protection Agency; Department of Environment, Climate and Communications; Department of Agriculture, Food and the Marine; Department of Housing, Local Government and Heritage; Leitrim County Council; Mayo County Council; and Roscommon County Council.

- Department of Agriculture, Food and the Marine (Fisheries Division); and
- Department of Housing, Local Government and Heritage.

The issues raised in these submissions and associated SEA responses are detailed on Table 1.1 below. Other submissions received as part of the Council's pre-draft consultation, including submissions from Inland Fisheries Ireland<sup>8</sup> and Office of Public Works<sup>9</sup>, will be taken into account throughout the SEA process.

**Table 1.1 SEA Scoping Submissions and SEA Responses**

Ref.	Issue raised in submission	SEA Response
<b>1. Submission from the Environmental Protection Agency</b>		
<b>A</b>	The EPA is one of the statutory environmental authorities under the SEA Regulations. In our role as an SEA environmental authority, we focus on promoting the full and transparent integration of the findings of the Environmental Assessment into the Plan and advocating that the key environmental challenges for Ireland are addressed as relevant and appropriate to the plan. Our functions as an SEA environmental authority do not include approving or enforcing SEAs or plans.	Noted.
<b>B</b>	As a priority, we focus our efforts on reviewing and commenting on key sector plans. For land use plans at county and local level, we provide a 'self-service approach' via the attached guidance document ' <i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i> '. This document is updated regularly and sets out our key recommendations for integrating environmental considerations into Local Authority land use Plans. We recommend that you take this guidance document into account in preparing the Plan and SEA.	The ' <i>SEA of Local Authority Land Use Plans – EPA Recommendations and Resources</i> ' document has been considered in the preparation of this SEA Scoping Report and will be kept on file for reference throughout the SEA process.
<b>C</b>	In preparing the Plan, Sligo County Council should also ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategy for the Northern & Western Region.	The SEA will seek to ensure that the Plan aligns with key relevant higher-level plans and programmes and is consistent with the relevant objectives and policy commitments of the National Planning Framework and the Regional Spatial and Economic Strategy for the Northern & Western Region.
<b>D</b>	<b>Specific Scoping/Issues Paper Comment</b> As well as our attached guidance, we include here some key environmental considerations which should also be taken into account in preparing the Plan. The EPA may provide additional comments upon receipt of the SEA Scoping Report for the Plan.	Noted.
<b>E</b>	<i>Community Engagement</i> One of the key messages from the State of the Environment Report (EPA, 2016) is the importance and value of Community Engagement. In preparing the Plan and carrying out the SEA (including developing alternatives), the need to proactively engage local communities should be a core consideration.	The public (including the local community) will be provided with an opportunity to make a submission on the Draft Plan and associated environmental documents during public display.
<b>F</b>	<i>Sustainable Development Goals</i> Describing the links with the UN Agenda 2030 for Sustainable Development and the related Sustainable Development Goals (SDGs) would help to frame the Plan (and SEA) within the context of the wider sustainable development agenda and ensure that the Plan is consistent with achieving the SDGs. Relevant targets and actions in Ireland's SDG Implementation Plan (DCCA, 2018) should be integrated as appropriate into the Plan.	The UN Sustainable Development Goals (SDGs) and relevant targets and actions in Ireland's SDG Implementation Plan (DCCA, 2018) have been considered in the preparation of this SEA Scoping Report and will be kept on file for reference throughout the SEA process, as

<sup>8</sup> The Chief Executive's recommendation in response to this submission relating to the protection of water quality, riparian zones and aquatic habitats was that the following should be considered when drafting the Plan: sections relating to the protection of water quality, riparian zones and aquatic habitats shall be prepared taking account of the Planning for Watercourses in the Urban Environment guidance document and considering the recommendations made by the IFI as part of pre-draft consultation.

<sup>9</sup> The Chief Executive's recommendation in response to this submission was that the preparation of the Draft Plan and associated Strategic Flood Risk Assessment should be informed by the Planning System and Flood Risk Management Guidelines (2009), the Flood Risk Management Plans and flood maps relevant to County Sligo.

Ref.	Issue raised in submission	SEA Response
		relevant and appropriate to the Plan.
<b>G</b>	<p><i>Critical service infrastructure</i></p> <p>In proposing and in implementing the Plan, you should ensure that the Plan is consistent with the need for proper planning and sustainable development. Adequate and appropriate critical service infrastructure should be in place, or required to be put in place, to service any development proposed and authorised during the lifetime of the Plan.</p>	Noted. The SEA will seek to ensure that the Plan requires adequate and appropriate critical service infrastructure to be in place to service developments authorised under the Plan.
<b>H</b>	<p><i>Integration of transport &amp; land-use planning</i></p> <p>The Plan should support the need for compact growth and better integration of transport and land-use planning, including walking and cycling infrastructure, public transport, park-and-ride facilities, etc.</p>	The SEA will seek to ensure that the Plan supports compact growth and sustainable transport solutions.
<b>I</b>	<p><i>Biodiversity</i></p> <p>The Plan should include specific actions/objectives and commitments to protect designated habitats and protected species (and associated ecological corridors/linkages) within, and adjacent to, the Plan area. The EPA has published guidance on '<i>Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes. Best Practice Guidance.</i>' The aim of this guidance is to inform practitioners, plan/project proponents and consent authorities on integrating SEA, EIA and AA processes and requirements to streamline biodiversity considerations. This may be useful to consider in preparing the Plan and SEA.</p>	The cited guidance will be considered as part of the preparation of the Plan and associated environmental assessments. The SEA will seek to ensure that the Plan includes specific actions/objectives and commitments to protect designated habitats and protected species (and associated ecological corridors/linkages) within, and adjacent to, the Plan area.
<b>J</b>	<p><i>Climate Action</i></p> <p>You should ensure that the Plan aligns with national commitments on climate change mitigation and adaptation, including those set out in the Climate Action Plan 2019, as well as incorporating any relevant recommendations and measures in sectoral, regional and local climate adaptation and mitigation plans.</p> <p>Key climate-related aspects to consider in the Plan and SEA include:</p> <ul style="list-style-type: none"> <li>• Direct and indirect impacts of the Plan on greenhouse gas emissions and removals (Mitigation);</li> <li>• Direct and indirect impacts of climate change on the implementation of the Plan, e.g. the resilience of critical water service infrastructure to flooding and drought (Adaptation);</li> <li>• The linkages between mitigation and adaptation (inter-relationships).</li> </ul>	The SEA will seek to ensure that the Plan aligns with national commitments on climate change and adaptation, as well as relevant sectoral, regional and local adaptation plans.
<b>K</b>	<p>The following resources may be of assistance in incorporating these factors into the Plan and SEA:</p> <ul style="list-style-type: none"> <li>• <i>Ireland's Greenhouse Gas Emissions Projections for 2018-2040</i></li> <li>• <i>Integrating Climatic Factors into the Strategic Environmental Assessment Process in Ireland</i></li> <li>• <i>Local Authority Adaptation Strategy Development Guideline</i></li> <li>• <i>Integration of Climatic Factors into SEA in Ireland</i></li> </ul>	These resources will be considered by the Plan and associated environmental assessments.
<b>L</b>	<p><i>Key Plans and Programmes</i></p> <p>Some suggested national/regional/sectoral plans to consider in preparing the Plan and SEA are listed below.</p> <p><u><i>Spatial Planning</i></u></p> <ul style="list-style-type: none"> <li>- Local Authority Development Plans</li> </ul> <p><u><i>Sustainable Development</i></u></p> <ul style="list-style-type: none"> <li>- National Implementation Plan for the Sustainable Development Goals</li> </ul> <p><u><i>Tourism</i></u></p> <ul style="list-style-type: none"> <li>- National Greenways Strategy</li> <li>- Local authority tourism strategies</li> </ul> <p><u><i>Climate</i></u></p> <ul style="list-style-type: none"> <li>- Relevant sectoral, regional and local authority climate adaptation and mitigation plans/strategies – including Climate Change Adaptation Plan for Built and Archaeological Heritage (DCHG, in preparation).</li> <li>- Relevant OPW Flood Risk Managements Plans and associated flood risk mapping</li> <li>- National Climate Action Plan 2019</li> <li>- National Energy and Climate Plan (DCCAE, in preparation)</li> <li>- National Mitigation Plan</li> <li>- National Adaptation Framework</li> </ul> <p><u><i>Biodiversity</i></u></p> <ul style="list-style-type: none"> <li>- National Biodiversity Action Plan</li> <li>- All Island Pollinator Plan</li> <li>- Any available biodiversity/heritage plans and habitat mapping</li> </ul> <p><u><i>Water &amp; Water Services</i></u></p>	These plans and programmes (and any new, subsequent versions) will be considered as part of the preparation of the Plan and associated environmental assessments, as relevant.

Ref.	Issue raised in submission	SEA Response
	<ul style="list-style-type: none"> <li>- River Basin Management Plan for Ireland 2018-2021</li> <li>- Water Services Strategic Plan / Capital Investment Programme and Draft National Water Resources Plan (Irish Water)</li> <li>- National Marine Planning Framework (draft)</li> <li><u>Transport</u></li> <li>- Planning Land Use and Transport – Outlook 2040 (DTTAS, in preparation)</li> <li><u>Air &amp; Noise</u></li> <li>- Local Authority Noise Action Plans</li> <li>- National Clean Air Strategy (DCCAIE, in preparation)</li> <li>- National Air Pollution Control Programme (DCCAIE, 2019)</li> </ul>	
<b>M</b>	<p><b>Available Guidance &amp; Resources</b></p> <p>Our website contains various SEA resources and guidance, including:</p> <ul style="list-style-type: none"> <li>- SEA process guidance and checklists</li> <li>- Inventory of spatial datasets relevant to SEA</li> <li>- topic specific SEA guidance (including Good practice note on Cumulative Effects Assessment (EPA, 2020), Guidance on SEA Statements and Monitoring (EPA, 2020), Integrating climatic factors into SEA (EPA, 2019), Developing and Assessing Alternatives in SEA (EPA, 2015), and Integrated Biodiversity Impact Assessment (EPA, 2012))</li> </ul> <p>You can access these guidance notes and other resources at:  <a href="https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/sea-topic-and-sector-specific-guidance/">https://www.epa.ie/our-services/monitoring--assessment/assessment/strategic-environmental-assessment/sea-topic-and-sector-specific-guidance/</a></p>	<p>These resources and guidance have been considered in the preparation of this SEA Scoping Report and will be accessed, as relevant, for reference throughout the SEA process.</p>
<b>N</b>	<p><b>Environmental Sensitivity Mapping (ESM) Webtool</b></p> <p>The ESM Webtool is a new decision support tool to assist SEA and planning processes in Ireland. The tool brings together over 100 datasets and allows users to explore environmental considerations within a particular area and create plan-specific environmental sensitivity maps. These maps can help planners anticipate potential land-use conflicts and help identify suitable development locations, while also protecting the environment. The ESM Webtool is available at <a href="http://www.enviromap.ie">www.enviromap.ie</a>.</p>	<p>The ESM Webtool has been considered in the preparation of this report and will be considered throughout the SEA process, where relevant.</p>
<b>O</b>	<p><b>EPA SEA WebGIS Tool</b></p> <p>Our SEA WebGIS Tool has been updated recently and is now publicly available at <a href="https://gis.epa.ie/EPAMaps/SEA">https://gis.epa.ie/EPAMaps/SEA</a>. It allows public authorities to produce an indicative report on key aspects of the environment in a specific geographic area. It is intended to assist public authorities in SEA screening and scoping exercises.</p>	<p>Available online EPA resources, including mapping resources, have been considered in the preparation of this report and will be considered throughout the SEA and AA processes.</p>
<b>P</b>	<p><b>EPA WFD Application</b></p> <p>Our WFD Application provides a single point of access to water quality and catchment data from the national WFD monitoring programme. The Application is accessed through EDEN <a href="https://wfd.edenireland.ie/">https://wfd.edenireland.ie/</a> and is available to public agencies. Publicly available data can be accessed via the <a href="http://Catchments.ie">Catchments.ie</a> website.</p>	
<b>R</b>	<p><b>EPA AA GeoTool</b></p> <p>Our AA GeoTool application has been developed in partnership with the NPWS. It allows users to select a location, specify a search area and gather available information for each European Site within the area. It is available at: <a href="https://gis.epa.ie/EPAMaps/AAGeoTool">https://gis.epa.ie/EPAMaps/AAGeoTool</a>.</p>	
<b>S</b>	<p><b>State of the Environment Report – Ireland’s Environment 2020</b></p> <p>In preparing the Plan and SEA, the recommendations, key issues and challenges described within our State of the Environment Report Ireland’s Environment – An Assessment 2020 (EPA, 2020) should be considered, as relevant and appropriate to the Plan. This should also be taken into account, in preparing the Plan and SEA.</p>	<p>The recommendations, key issues and challenges described within the current version of Ireland’s Environment will be considered in the preparation of the Plan and SEA.</p>
<b>T</b>	<p><b>Transition to a low carbon climate resilient economy and society</b></p> <p>You should ensure that the Plan aligns with national commitments on climate change mitigation and adaptation, as well as relevant sectoral, regional and local adaptation plans.</p>	<p>The SEA will seek to ensure that the Plan aligns with national commitments on climate change and adaptation, as well as relevant sectoral, regional and local adaptation plans.</p>
<b>U</b>	<p><b>Environmental Authorities</b></p> <p>Under the SEA Regulations, you should consult with:</p> <ul style="list-style-type: none"> <li>• Environmental Protection Agency;</li> <li>• Minister for Housing, Local Government and Heritage;</li> <li>• Minister for Tourism, Culture, Arts, Gaeltacht, Sport and Media (formerly Minister for Culture, Heritage and the Gaeltacht (functions transferred from Minister for Environment, Heritage and Local Government/ Minister for Housing, Planning and Local Government to Minister for Culture, Heritage and the Gaeltacht by S.I. 192 of 2011);</li> <li>• Minister for Environment, Climate and Communications; and</li> <li>• Minister for Agriculture, Food and the Marine.</li> <li>• any adjoining planning authority whose area is contiguous to the area of a planning authority which prepared a draft plan, proposed variation or local area plan.</li> </ul>	<p>Notice has been given to relevant environmental authorities as part of the SEA scoping process.</p>

Ref.	Issue raised in submission	SEA Response
<b>2. Submission from the Department of the Environment, Climate and Communications (from the Geological Survey Ireland)</b>		
<b>A</b>	<p>Geological Survey Ireland is the national earth science agency and is a division of the Department of the Environment, Climate and Communications. We provide independent geological information and advice and gather various data for that purpose. Please see our website for data availability. We recommend using these various data sets, when conducting the EIAR, SEA, planning and scoping processes. Use of our data or maps should be attributed correctly to 'Geological Survey Ireland'. With reference to the email from Sligo County Council received on the 29 July 2021, concerning the preparation of Sligo CDP 2023-2029 – SEA Scoping Notice, 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 datasets.</p>	Noted. Relevant GSI data sets have been considered in the preparation of this report and will be considered throughout the SEA process.
<b>B</b>	<p><b><u>Geoheritage</u></b>  The Geological heritage county audit was completed in 2004. We would encourage the inclusion of County Geological Sites (CGSs) as specific policy objectives within the draft CDP.  The following points are suggested by the Geological Heritage Programme of Geological Survey Ireland, as appropriate ways in which to address the need to protect geological heritage in any one of Ireland's local authority areas:  As a minimum, Geological Survey Ireland would like the Local Authority to include a policy objective with wording such as:  "to protect from inappropriate development the scheduled list of geological heritage sites [Appendix X]." Or "to protect from inappropriate development the following list of County Geological Sites"  The Geological Heritage Programme views the Local Authorities as critical partners in protecting, through the planning system, those CGS which fall within their county limits. In many cases these are often sites of high amenity or educational value, already zoned or listed in the plan. Listing in the CDP provides protection of the sites against potentially damaging developments that normally require planning permission, such as building, quarrying, landfilling or forestry. It is also important that the democratic process of public consultation and approval by councillors of the CDP means that stakeholders in the sites and all the local community can buy into the process.  CGSs have been adopted in the National Heritage Plan, and will form a major strand of geological nature conservation to complement the various ecological and cultural conservation measures.  It is important to note however, that management issues for the majority of geological heritage sites may differ from ecological sites, and in some cases development may facilitate enhanced geological understanding of a site by exposing more rock sections - for example, in a quarry extension. Consultation at the earliest stages can identify any issues relevant to an individual site or proposed development. County Geological Sites are the optimal way of addressing the responsibility of each authority under the Planning and Development Act 2000 and its amendments, to protect sites of geological interest. It would also be necessary to include a policy objective to protect geological NHAs as they become designated and notified to the Local Authority, during the lifetime of the Plan.  As always we are available if you require any further information, please feel free to contact Clare Glanville (Clare.Glanville@gsi.ie).</p>	This information will be considered when preparing the Draft Plan and undertaking the SEA.
<b>C</b>	<p><b><u>Culture and Tourism</u></b>  Over the past number of years geology has become a large part of Irish tourism. Ireland currently has three UNESCO Global Geoparks, and a number of other geotourism projects. These Geoparks, along with other tourism initiatives such as the Wild Atlantic Way, Irelands Ancient East, and Irelands Hidden Heartlands have bolstered tourism in various parts of Ireland and helped to increase its levels in areas that were previously not as popular with tourists. We would encourage Sligo County Council to continue this trend, and to use the geological audit information making it easily available to the general public. We would encourage geology to be a significant part of any tourism initiative that may be introduced.</p>	This information will be considered when preparing the Draft Plan and undertaking the SEA, where relevant.
<b>D</b>	<p><b><u>Dimension Stone/Stone Built Ireland</u></b>  Stone Built Ireland is a 2 year research collaboration agreement between Geological Survey Ireland, Trinity College Dublin &amp; the office of Public Works. The project aims to document building and decorative stone in Ireland to inform government agencies,</p>	This information will be considered when preparing the Draft Plan and undertaking the SEA, where relevant.

Ref.	Issue raised in submission	SEA Response
	<p>building owners and conservationists of the sources for suitable replacement stone in restoration work and to develop a greater awareness among the general public. In addition to promoting citizen science and awareness of local materials, the inventory will aid the public in complying with part 4 of the Planning and Development Act 2000, which requires owners to conserve protected structures. It will also assist local authorities in issuing Section 57 Declarations, which outline 'the type of works which it considers would or would not materially affect the character of the structure or any element of the structure'.</p> <p>This project will build on work already completed funded by the Irish Research Council (March 2019 - September 2020) that carried on primary research on the topic and developed a simple database and web-based platform as well as hosting various heritage displays at venues.</p>	
<b>E</b>	<p><b><u>Groundwater</u></b>            Geological Survey Ireland's Groundwater and Geothermal Unit, provides advice, data and maps relating to groundwater distribution, quality and use, which is especially relevant for safe and secure drinking water supplies and healthy ecosystems. Proposed developments need to consider any potential impact on specific groundwater abstractions and on groundwater resources in general. We recommend using the groundwater maps on our Map viewer which should include: wells; drinking water source protection areas; the national map suite - aquifer, groundwater vulnerability, groundwater recharge and subsoil permeability maps. For areas underlain by limestone, please refer to the karst specific data layers (karst features, tracer test database; turlough water levels (gwlevel.ie). Background information is also provided in the Groundwater Body Descriptions. Please read all disclaimers carefully when using Geological Survey Ireland data.            Our Groundwater and Geothermal Unit run GWClimate which is a groundwater monitoring and modelling project that aims to investigate the impact of climate change on groundwater in Ireland. This is a follow on from a previous project (GWFlood) and the data may be useful in relation to Flood Risk Assessment (FRA) and management plans. Groundwater maps and data are available on the Map viewer.</p>	<p>Impacts on groundwater will be considered by the SEA.</p> <p>Aquifer productivity and vulnerability mapping will be included in the SEA Environmental Report.</p> <p>The SEA will reference datasets available from GSI that may be useful to lower-tier project planning, including those relating to Aquifer Productivity, Aquifer Vulnerability, Bedrock Geology, Quaternary Geology, Mineral deposits, Aggregate Potential, Groundwater Resources, Geohazards, such as Landslide Events and Landslide Susceptibility Mapping, Physiographic Units Mapping, Geochemistry data, Geophysical data of soils and rocks and GSI Marine and Coastal Unit data.</p>
<b>F</b>	<p><b><u>Geological Mapping</u></b>            Geological Survey Ireland maintains online datasets of bedrock and subsoils geological mapping that are reliable and accessible. We would encourage you to use these data which can be found here, in your future assessments.</p>	
<b>G</b>	<p><b><u>Geohazards</u></b>            Geohazards can cause widespread damage to landscapes, wildlife, human property and human life. In Ireland, landslides, flooding and coastal erosion are the most prevalent of these hazards. We recommend that geohazards be taken into consideration, especially when developing areas where these risks are prevalent, and we encourage the use of our data when doing so.            Geological Survey Ireland has information available on landslides in Ireland via the National Landslide Database and Landslide Susceptibility Map both of which are available for viewing on our dedicated Map Viewer. Associated guidance documentation relating to the National Landslide Susceptibility Map is also available. Geological Survey Ireland also engaged in a national project on Groundwater Flooding. The data from this project may be useful in relation to Flood Risk Assessment (FRA) and management plans, and is described in more detail under 'Groundwater' above.            Coastal Vulnerability while seen as a potential geohazard, is discussed in more detail under our marine and coastal unit information below.</p>	<p>Regarding geothermal energy, SEA considers the environmental effects of Plan policies and objectives – including any providing for geothermal energy. Potential environmental effects arising from geothermal energy may include contributions towards greenhouse gas emission targets and effects on water quality, ecology, soil stability. Inclusion of Geothermal Suitability mapping is not within the scope of the SEA, however where it forms part of Plan policies/objectives, it would be considered by the SEA.</p>
<b>H</b>	<p><b><u>Geothermal Energy</u></b>            Geothermal energy harnesses the heat beneath the surface of the Earth for heating applications and electricity generation, and has proven to be secure, environmentally sustainable and cost effective over long time periods. Geothermal applications can range in depth from a few metres below the surface to several kilometres. Ireland has widespread shallow geothermal resources for small and medium-scale heating applications, which can be explored online through Geological Survey Ireland's Geothermal Suitability maps for both domestic and commercial use. We recommend use of our Geothermal Suitability maps to determine the most suitable type of ground source heat collector for use with heat pump technologies. Ireland also has recognised potential for deep geothermal resources.            The Roadmap for a Policy and Regulatory Framework for Geothermal Energy was launched at the Geoscience 2020 Conference in November 2020. The Assessment of Geothermal Resources for District heating in Ireland and the Roadmap for a Policy and Regulatory framework for Geothermal Energy in Ireland documents have been developed to support the Government's commitments under the Climate Action Plan 2019 and the Programme for Government.</p>	<p>Mineral resources will be recognised as a material asset by the SEA.</p>

Ref.	Issue raised in submission	SEA Response
	For further information please see our Geoenergy pages on our website or contact the Groundwater and Geothermal Unit of the Geological Survey Ireland directly.	
<b>I</b>	<p><b><u>Natural Resources (Minerals/Aggregates)</u></b></p> <p>Geological Survey Ireland is of the view that the sustainable development of our natural resources should be an integral part of all development plans from a national to regional to local level to ensure that the materials required for our society are available when required.</p> <p>Geological Survey Ireland highlights the consideration of mineral resources and potential resources as a material asset which should be explicitly recognised within the environmental assessment process.</p> <p>Geological Survey Ireland provides data, maps, interpretations and advice on matters related to minerals, their use and their development in our Minerals section of the website. The Active Quarries, Mineral Localities and the Aggregate Potential maps are available on our Map Viewer.</p>	
<b>J</b>	<p><b><u>Physiographic Units</u></b></p> <p>Geological Survey Ireland maintains online datasets of geological mapping that are reliable and accessible. Physiographic units are cartographic representations of the broad-scale physical landscape of a region. They delineate physical regions showing internal uniformity with respect to one or more environmental attributes that can be clearly differentiated from neighbouring regions. They are valuable for regional land-use planning, and in studies of the influence of physical landscape on the ecological environment. This map is produced in support of the actions to be implemented in National Landscape Strategy for Ireland 2015 – 2025. We would encourage you to use our physiographic units map data which can be found here.</p>	
<b>K</b>	<p><b><u>Geochemistry of soils, surface waters and sediments</u></b></p> <p>Geological Survey Ireland provides baseline geochemistry data for Ireland as part of the Tellus programme. Baseline geochemistry data can be used to assess the chemical status of soil and water at a regional scale and to support the assessment of existing or potential impacts of human activity on environmental chemical quality. Tellus is a national-scale mapping programme which provides multi-element data for shallow soil, stream sediment and stream water in Ireland. At present, mapping consists of the border, western and midland regions. Data is available at <a href="https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx">https://www.gsi.ie/en-ie/data-and-maps/Pages/Geochemistry.aspx</a>. This page also hosts Geochemical Mapping of Agricultural and Grazing Land Soil of Europe (GEMAS) and litho-geochemistry (rock geochemistry) from southeast Ireland datasets. Geological Survey Ireland and partners are undertaking applied geochemistry projects to provide data for agriculture (Terra Soil), waste soil characterisation (Geochemically Appropriate Levels for Soil Recovery Facilities) and mineral exploration (Mineral Prospectivity Mapping).</p>	
<b>L</b>	<p><b><u>Geophysical data</u></b></p> <p>Geological Survey Ireland produces high-resolution geophysical data (Magnetic field, electrical conductivity, natural gamma-ray radiation) of soils &amp; rocks as part of the Tellus programme. These data currently cover approximately 75% of the country and provide supporting geological information on a regional scale useful for assessing environmental impact and risk.</p>	
<b>M</b>	<p><b><u>Marine and Coastal Unit</u></b></p> <p>Our marine environment is hugely important to our bio-economy, transport, tourism and recreational sectors. It is also an important indicator of the health of our planet. Geological Survey Ireland's Marine and Coastal Unit in partnership with the Marine Institute, jointly manages INFOMAR, Ireland's national marine mapping programme; providing key baseline data for Ireland's marine sector. The programme delivers a wide range of benefits to multi-sectoral end-users across the national blue economy with an emphasis on enabling our stakeholders. Demonstrated applications for the use of INFOMAR's suite of mapping products include Shipping &amp; Navigation, Fisheries Management, Aquaculture, Off-shore Renewable Energies, Marine Leisure &amp; Tourism and Coastal Behaviour.</p> <p>Of particular interest to tourism is the extensive database of shipwrecks mapped by the INFOMAR programme, many lost close to the coast and with engaging human interest stories associated with them <a href="https://www.infomar.ie/maps/story-maps/shipwrecks">https://www.infomar.ie/maps/story-maps/shipwrecks</a>.</p> <p>INFOMAR also produces a wide variety of seabed mapping products that enable public and stakeholders to visualize Ireland's seafloor environment <a href="https://www.infomar.ie/maps/downloadable-maps/maps">https://www.infomar.ie/maps/downloadable-maps/maps</a>. Story maps have also been developed providing a different perspective of some of the bays and harbors of the Irish coastline <a href="https://www.infomar.ie/maps/story-maps/exploring-dingle-bay-different-perspective">https://www.infomar.ie/maps/story-maps/exploring-dingle-bay-different-perspective</a>. We would therefore recommend use of our Marine and Coastal Unit datasets available on our website and Map Viewer.</p> <p>The Marine and Coastal Unit also participate in coastal change projects such as CHERISH (Climate, Heritage and Environments of Reefs, Islands, and Headlands) and</p>	

Ref.	Issue raised in submission	SEA Response
	are undertaking mapping in areas such as coastal vulnerability and coastal erosion. Further information on these projects can be found here.	
<b>3. Submission from the Department of the Environment, Climate and Communications (from the Waste Policy and Resource Efficiency Division)</b>		
<b>A</b>	In respect of waste in the within documentation, we would be obliged if the local authority would consult directly with their respective Regional Waste Management Planning Office regarding development of the final plans.	Noted. The Draft Plan will be placed on public display in the future and submissions will be invited. Any submissions made on the Draft Plan and associated environmental assessments will be taken into account before the Plan is finalised.
<b>4. Submission from the Department of Agriculture, Food and the Marine</b>		
<b>A</b>	Commercial sea fishing is a long standing, pre-existing and traditional activity in the marine environment. The evaluation and consideration of potential impacts on any commercial sea fishing activities needs to be given consideration as part of any planning/proposal process and during the development process itself. It is imperative that engagement should be sought with the fishing industry and other relevant stakeholders at as early a stage as possible to discuss any changes that may affect them to afford a chance for their input. Fishers' interests and livelihoods must be fully recognised, supported, and taken into account.	Noted. These issues will be taken into account in the Plan preparation and associated SEA process, where relevant. Fisheries will be recognised as a material asset by the SEA.
<b>5. Submission from the Department of Housing, Local Government and Heritage</b>		
<b>A</b>	<p><b>Nature Conservation</b>  <u>Context of Observations:</u>  The following observations are made by the Department in its role as the authority with overarching responsibility for nature conservation and the nature directives (i.e. the Birds and Habitats Directives). The observations are not exhaustive but are intended to assist the planning authority in meeting its obligations in relation to nature conservation, European sites, biodiversity and environmental protection in the process of reviewing and preparing the County Development Plan 2023-2029 for Sligo, hereafter referred to as the CDP. The Department welcomes the opportunity to provide observations at this early 'Issues Paper' stage of the review process.</p>	Noted.
<b>B</b>	<p><b>1. Government policy in relation to nature conservation:</b>  We are in the midst of a national and global biodiversity crisis. The recent (2019) Article 17 report on the Status of EU Protected Habitats and Species in Ireland and Article 12 report on the status and trends of Ireland's bird species have shown that even with strict protection these habitats and species are continuing to deteriorate. Ireland's 6th National Report to the Convention on Biological Diversity has identified that although some progress has been made by Ireland in achieving the 20 UN Aichi Biodiversity targets, progress is at an insufficient rate. These reports are available at <a href="http://www.npws.ie">www.npws.ie</a>.  Government policy on nature conservation is clearly set out in the National Biodiversity Action Plan 2017-2021 (NBAP) and Ireland is also fully committed to putting Europe's biodiversity on the path to recovery by 2030 for the benefit of people, climate and the planet as set out in the EU Biodiversity Strategy to 2030 and is a signatory to the United Nations (UN) Convention on Biological Diversity Strategic Plan for Biodiversity 2011-2020. These policies are reflected in Ireland's vision for biodiversity:  'That biodiversity and ecosystems in Ireland are conserved and restored, delivering benefits essential for all sectors of society and that Ireland contributes to efforts to halt the loss of biodiversity and the degradation of ecosystems in the EU and globally'.  Never before has this statement been more relevant, the recent Covid-19 pandemic has highlighted the value of biodiversity in relation to our physical and mental wellbeing, now more than ever there is an urgent need to protect our natural resources for present and future generations.  Objective 1 in the NBAP is to 'Mainstream biodiversity into decision-making across all sectors' and this objective is reflected in Regional Policy Objective (RPO) 5.5 of the North Western Regional Spatial Economic Strategy 2020-2032 that 'there is no net contribution to biodiversity loss arising from development supported in this strategy'.  In support of these objectives, the Department would recommend including objectives in the development plan to implement and monitor the actions as set out in the NBAP; the conservation of biodiversity is an essential component of sustainable development. The Department also provides support to local authorities in carrying</p>	The information provided will be integrated into the SEA ER as appropriate. The SEA will seek to ensure that the Plan contributes towards the protection and management of biodiversity and flora and fauna. The SEA and AA, as relevant, will take account of the issues raised and will identify the likely significant effects of implementing the Plan.

Ref.	Issue raised in submission	SEA Response
	<p>out actions under the NBAP through the Local Authority Biodiversity Grant scheme. This funding for biodiversity action in local areas, made available through the National Parks and Wildlife Service of the Department, is an important element of the overall NBAP implementation.</p> <p>The Department welcomes Sligo's intention to implement major changes to the core strategy by ensuring 'green growth' is at the centre of all policies and objectives of the new plan. In support of this vision and to help build a county that is a healthy place for its people and visitors the Department would recommend, in reviewing the CDP, the local authority is fully cognisant of Ireland's International, European and National commitments to biodiversity. The protection, conservation and enhancement of biodiversity will help create the foundations for a 'smart' and 'green' economy and will provide for other valuable ecosystem services such as; food production, clean air and water, improved mental and physical health.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> Ensure all developments arising from this plan include measures to conserve, protect and enhance biodiversity.</li> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To support the aims of the National Biodiversity Action Plan 2017-2021 and County Sligo Heritage Plan 2016 -2020 and any subsequent plans in this regard over the lifetime of this plan.</li> </ul>	
<b>C</b>	<p><b>2. Environmental assessments and nature conservation:</b></p> <p>It is important that the CDP sets out the legislative requirements in relation to the protection of designated sites and protected species under both European (EU Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC)) and national legislation (i.e. Wildlife Act 1976-2018), but the CDP should also ensure that Government policy on biodiversity can be delivered in County Sligo. It is imperative that environmental assessments (Strategic Environmental Assessment (SEA), Appropriate Assessment (AA) and Strategic Flood Risk Assessment (SFRA)) in relation to the CDP are fully integrated with the plan-making process and apply the precautionary principal to ensure there is no further deterioration of habitats and species both within and outside designated across the county and its zone of influence. The council should ensure that ecological expertise is available to it in undertaking these assessments. The Department recommends that there is an overarching commitment in the CDP to undertake Appropriate Assessment (AA), Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Ecological Impact Assessment (EcIA) as required and appropriate in relation to all downstream plans and projects. Where development projects arising from the CDP are not subject to EIA, assessment of the impacts to biodiversity will best be facilitated through the preparation of an Ecological Impact Assessment (EcIA). The Department recommends including an objective in the CDP in this regard. Surveys carried out for the preparation of NIS/NIR, ER, EIAR or EcIA generally generate biodiversity data, and the Department encourages the Council to include an objective to ensure these data are made available to the National Biodiversity Data Centre (NBDC) on an ongoing basis. This will strengthen the county's biodiversity knowledge base and ultimately aid its protection.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To ensure all downstream plans and projects arising from this plan will be required to undertake Appropriate Assessment (AA), Strategic Environmental Assessment (SEA), Environmental Impact Assessment (EIA) and Ecological Impact Assessment (EcIA) as required and appropriate.</li> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> Biodiversity data generated, during the lifetime of this plan, for the preparation of environmental assessment reports (e.g. ER, EIAR, NIS/NIR or EcIA) shall be submitted to the National Biodiversity Data Centre (NBDC).</li> </ul>	<p>This topic will be addressed as relevant in the description (mapped and textual) of the environmental baseline, in Strategic Environmental Objectives, indicators and targets and in the identification of likely significant environmental effects, if any, and in the updating of existing Plan provisions (arising from superseded legislation, guidelines, etc.) and the inclusion of new Plan provisions for environmental protection and sustainable development.</p> <p>The information provided will be integrated into the SEA ER as appropriate. The SEA will seek to ensure that the Plan contributes towards the protection and management of biodiversity and flora and fauna.</p> <p>The SEA and AA, as relevant, will take account of the issues raised and will identify the likely significant effects of implementing the Plan and will seek to ensure that the Plan aligns with national commitments on nature conservation.</p>
<b>D</b>	<p><b>3. Nature conservation within the plan:</b></p> <p>The Department notes the council's existing strong commitment to biodiversity protection under the current CDP 2017-2023, and it is hoped that this focus on biodiversity protection will continue when reviewing the natural heritage objectives as part of the CDP review process. The Department would like to commend the council on their achievements to date and in particular the funding and promotion of the County Sligo Swift Survey 2019 and their on-going support and commitment to the All-Ireland Pollinator Plan. The council should build on this commitment and seek to strengthen biodiversity protection within the CDP area and its zone of influence. There are real opportunities to protect and enhance biodiversity when considered early in any development proposal and in particular at strategic plan level. The Department recommends that biodiversity considerations are integrated into all sections of the plan and are taken into account when zoning lands for development.</p>	<p>The information provided will be integrated into the SEA ER as appropriate. The SEA will seek to ensure that the Plan contributes towards the protection and management of biodiversity and flora and fauna.</p> <p>The SEA and AA, as relevant, will take account of the issues raised and will identify the likely significant effects of implementing the Plan and will</p>

Ref.	Issue raised in submission	SEA Response
	<p>It is also important, when biodiversity measures are incorporated into development proposals, that the measures are appropriate to the particular situation and they can be sustained long term (i.e. evidence based solutions to biodiversity protection and enhancement). The incorporation of advice from a professional ecologist early in spatial planning processes can assist in addressing these matters and is recommended by the Department.</p> <p>Whilst reviewing the CDP policies and objectives the Department would like to advise the planning authority of the importance of avoiding policies and objectives that undermine or are in direct conflict with natural heritage policies and objectives. The review of the plan's policies and objectives should take place with a view to streamlining and strengthening policies and ensuring that they are consistent with current European and National plans, reports, guidance documents and case law relating to biodiversity (i.e. policies and objectives must be biodiversity-proofed).</p> <p>The Department recommends that natural heritage objectives are clear and robust, and there is an objective to protect, conserve and enhance biodiversity both within and outside protected sites. The CDP should provide a list of proposed Natural Heritage Areas within the county with a clear objective to protect and conserve these sites of high nature value. This will be critical if the council is to meet its obligations in relation to nature conservation and Ireland is to meet its target to halt the loss of biodiversity.</p> <p>The council should continue to lead by example by ensuring the CDP has a strong policy commitment to positive biodiversity actions. For example, the Department would welcome the inclusion of an objective whereby all public buildings and public open spaces in the county incorporate positive biodiversity measures as standard practice. Actions can include simple measures, e.g. all new public buildings incorporate nesting boxes for swifts, bat boxes and/or bat bricks, the creation of wildlife habitats on public open spaces, to more ambitious measures that will ensure 'biodiversity net gain' in public development schemes. The Department would recommend the inclusion of objectives to promote the National Pollinator Plan 2021-2025, this plan has particular actions that are targeted for implementation by local authorities.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To ensure the conservation and protection of all areas of high biodiversity value within the county, (e.g. European and Nationally designated sites, Statutory Nature Reserves, Refuges for Fauna, Ramsar Sites and proposed Natural Heritage Areas).</li> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To promote the objectives of the National Pollinator Plan 2021-2025 and in particular within local authority managed or owned lands.</li> </ul>	<p>seek to ensure that the Plan aligns with national commitments on nature conservation.</p>
E	<p><b>4. Climate change and biodiversity:</b></p> <p>There is growing acknowledgement that restoring and protecting nature is one of the best strategies for tackling climate change. The strategy of using nature as a defence against climate impacts is called Ecosystem-based Adaptation (EbA)<sup>5</sup>. The Department's Biodiversity Climate Change Sectoral Adaptation Plan 2019<sup>6</sup> includes the objective to 'Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change'. The Department highlights that rapid climate change is likely to result in more immediate effects in the coastal zone and recommends that development projects or plans located in Sligo's coastal zone should be future proofed for worst case scenarios. It is imperative that Sligo's natural defence systems are protected, restored and enhanced to build resilience to this real and growing threat and any development in the coastal zone should be planned and considered accordingly adopting an ecosystem service approach. The CDP should be cognisant of the new functions of local authorities outlined under the National Marine Planning Framework and the Marine Planning and Development Management Bill. The Department would recommend that the CDP set out a policy framework for development projects and plans within Sligo's coastal zone (i.e. within the councils remit). This framework should consider the context of rapidly changing environmental conditions, legal obligations under SEA, EIA and AA for the protection of designated sites and habitats and/or species of nature conservation interest as well as the protection of biodiversity in the coastal zone as stipulated by the National Biodiversity Action Plan 2017 – 2021.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> Protect, restore and enhance biodiversity to increase the resilience of natural and human systems to climate change, with greater consideration given to nature based solutions.</li> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To develop a framework where all developments, (including local authority developments), within Sligo's coastal zone will adequately consider changing environmental conditions due to climate change, legal</li> </ul>	<p>The information provided will be integrated into the SEA ER as appropriate. The SEA will seek to ensure that the Plan contributes towards the protection and management of biodiversity and flora and fauna and climate change mitigation and adaptation.</p> <p>The SEA and AA, as relevant, will take account of the issues raised and will identify the likely significant effects of implementing the Plan and will seek to ensure that the Plan aligns with national commitments on climate change adaptation and mitigation.</p>

Ref.	Issue raised in submission	SEA Response
	obligations under SEA, EIA and AA for the protection of designated sites, habitats and/or species of nature conservation interest as well as the protection of biodiversity in the coastal zone as stipulated by the National Biodiversity Action Plan 2017 – 2021.	
F	<p><b>5. Green Infrastructure (GI):</b></p> <p>The incorporation of Green Infrastructure (GI), as defined by the EU Commission<sup>7</sup>, in spatial planning is one of the ways in which the National Biodiversity Action Plan 2017 -2021 seeks to address the main drivers of biodiversity loss in Ireland. This is also a National Policy Objective of the National Planning Framework<sup>8</sup>. Sligo is predominately a rural county and developments should avoid the fragmentation of landscape features, including ecological corridors which allow for the mobility of species in a changing climate. It is apparent that native hedgerows are being removed during development projects and being replaced by post and rail fencing and non-native hedge species throughout the county. The Department recommends that the council include the objective that all hedgerows will be retained and subject to appropriate long-term management in any new development and where removal is absolutely necessary that the same length of compensatory hedgerow will be planted using appropriate native species.</p> <p>It is an objective of the National Planning Framework to promote compact growth in larger urban centres and the Department would advise that the promotion of GI should be integrated into these developments with a commitment to reverse the loss of green urban ecosystems. The Department notes that the local authority has developed a Public Realm Plan (PRP) for Sligo City and this plan has identified areas which could benefit from enhancements in order to create 'high quality urban spaces'. It is imperative that the local authority has the appropriate ecological advice available to it as it undertakes any actions arising from this PRP.</p> <p>The Department would welcome a commitment in the CDP to the preparation of an overall green infrastructure strategy for the county, (i.e. a network of natural areas), in accordance with the EU Strategy on Green Infrastructure<sup>9</sup>. The Department would recommend the inclusion of clear objectives with regard to the protection of trees, hedgerows and other habitats which contribute to GI in the county.</p> <p>A clear distinction should be made between GI and Greenways, Blueways and Peatways within the plan. As advised in the National Greenway Strategy<sup>10</sup>, greenways and other associated linear trails should be designed to take into account, and avoid where necessary, the sensitivities of natural heritage. Whilst the development of Greenways, Blueways and Peatways is welcomed, the same risks to biodiversity can be associated with these type of trails, as with any other road or infrastructure development, and the Department recommends that such proposals are subject to route/site selection processes to ensure that impacts to biodiversity and nature conservation interests are avoided. The Department also notes the need to apply the precautionary principle when screening for Appropriate Assessment (AA) and/or undertaking AA for Greenways, Blueways and Peatways.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To develop a Green Infrastructure Strategy for the county. This Strategy will provide for a strategic approach to green space planning in County Sligo</li> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To ensure the protection and enhancement of biodiversity and ecological networks within the plan area in accordance with Article 10 of the Habitats Directive. This will ensure landscape features, which act as ecological corridors and stepping stones, will improve the overall coherence of the Natura 2000 network and biodiversity in general.</li> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To ensure biodiversity and nature conservation interests are fully incorporated into route/site selection processes during the development of Greenways, Blueways and Peatways.</li> </ul>	<p>Green infrastructure will be considered in the SEA process to ensure the provisions of the Plan will contribute towards protection of the environment with regard to impacts arising from material assets.</p> <p>The SEA and AA, as relevant, will take account of the issues raised and will identify the likely significant effects of implementing the Plan and will seek to ensure that the Plan aligns with national legislation.</p>
G	<p><b>6. Threats and pressures to nature conservation in County Sligo:</b></p> <p><b>6.1 Water Quality:</b></p> <p>Sligo is experiencing increased demands from an expanding population and associated urban development and these demands, particularly in relation to the supply of clean drinking water, frequently manifest as impacts on key ecological features and protected habitats or species within the county (e.g. Lough Hoe Bog Special Area of Conservation, Site Code 000633, incorporating Lough Talt). The Department highlights that current pressure levels may already be beyond the carrying capacity of the natural environment and the ramifications of continuing 'as is' may be significant for the natural environment. The Department recommends that future development planning should take account of current pressure levels on the natural environment, any future pressures including impacts arising from climate</p>	<p>This topic will be addressed as relevant in the description (mapped and textual) of the environmental baseline, in Strategic Environmental Objectives, indicators and targets and in the identification of likely significant environmental effects, if any, and in the updating of existing Plan provisions (arising from superseded legislation, guidelines, etc.) and the</p>

Ref.	Issue raised in submission	SEA Response
	<p>change and the need for sustainable development throughout the entire county, including in urban areas. The Department recommends that the CDP explicitly acknowledges the constraints to development arising from the need to protect European and Nationally important sites and the need for adequate resources in the council to support informed decision making regarding ecological assessment and sustainable development.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To ensure all developments arising from the plan adhere to the concept of sustainable development and no developments will be permitted that adversely impact on the integrity of European designated sites (Special Areas of Conservation and Special Protection Areas) and biodiversity in general.</li> </ul>	<p>inclusion of new Plan provisions for environmental protection and sustainable development.</p> <p>The SEA will use information from the EPA regarding surface water status, including that contained within Integrated Water Quality Reports. The SEA will also include information on groundwater status.</p> <p>Pressures on waterbodies, such as forestry or domestic waste water treatment systems, that are failing to meet the WFD's overall objective of good status will be identified by the SEA and policy responses will be recommended as necessary.</p>
H	<p><b>6.2 Invasive Alien Species (IAS):</b> The spread of Invasive Alien Species (IAS) is recognised as a significant cause of global biodiversity loss, (IBPES 2019)<sup>11</sup>. The recent (2019) Article 17 report on the Status of EU Protected Habitats and Species in Ireland has also noted the significant threat IAS poses to the protection of biodiversity in Ireland. The presence of the invasive plant species such as Japanese Knotweed, Rhododendron, Himalayan Balsam and Giant Hogweed is of particular concern in County Sligo. The Department is aware that Local Authority Waters Programme (LAWPRO) is working with local communities and councils in a number of areas across the country on the eradication of IAS from water courses and would encourage the inclusion of objectives in the CDP in relation to the containment and control of invasive species with reference to the requirements of the EC (Birds and Natural Habitats) Regulations, 2011 - 2021.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To control and prevent the spread of Invasive Alien Species (IAS), all developments, where IAS is a known threat, will be required to provide an IAS management plan as part of the planning process and to comply with the provisions of the European Communities Birds and Habitats Regulations 2011, as amended.</li> </ul>	<p>Management of invasive species will be addressed by the Plan.</p>
I	<p><b>6.3 Light Pollution:</b> The Department wishes to highlight the impacts of light pollution on wildlife in general and in particular to bat species. The Department would recommend that the CDP includes a lighting policy that will reduce these impacts and the planning authority should refer to the EUROBATS guidelines<sup>12</sup> and Dark Sky lighting recommendations<sup>13</sup> for further information in this regard. It is important to note that the correct LEDs and light fittings can ensure these impacts are avoided or minimised and can also reduce carbon emissions.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To develop a public lighting policy for the county that will ensure proposals to upgrade or expand artificial lighting will consider the impacts to biodiversity and climate change.</li> </ul>	<p>Light pollution will be addressed by the Plan.</p>
J	<p><b>6.4 Wetlands:</b> The Department notes that wetlands across the county are particularly vulnerable to development pressure due to changes in drainage systems, siltation, infilling, and recreational use. The Department would like to highlight recent guidance produced by Inland Fisheries Ireland with respect to development around waterways and in urban habitats. Wetlands provide an essential service in relation to flood alleviation and in particular the Department wishes to highlight the significant role of peatlands in relation to climate sequestration. It is recommended that the CDP include an objective to support the aims of the National Peatlands Strategy 2015<sup>15</sup> and the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022<sup>16</sup>. The protection and restoration of both designated and undesignated peatland sites can assist Sligo in meeting its climate action objectives.</p> <ul style="list-style-type: none"> <li>• <b>The Department recommends a clear policy objective in the draft CDP:</b> To ensure development on wetlands, including peatlands, are subject to the requirements of the planning code as provided for in the Planning and Development Act, 2000 (as amended) and the Planning and Development Regulations, 2001 (as amended) and environmental assessment in this regard.</li> </ul>	<p>This topic will be addressed as relevant in the description (mapped and textual) of the environmental baseline, in Strategic Environmental Objectives, indicators and targets and in the identification of likely significant environmental effects, if any, and in the updating of existing Plan provisions (arising from superseded legislation, guidelines, etc.) and the inclusion of new Plan provisions for environmental protection and sustainable development.</p>

Ref.	Issue raised in submission	SEA Response
	<ul style="list-style-type: none"> <li><b>The Department recommends a clear policy objective in the draft CDP:</b> To support the aims of the National Peatlands Strategy and the implementation of the National Raised Bog Special Areas of Conservation Management Plan 2017-2022.</li> </ul>	
<b>K</b>	<p><b>7. Monitoring the impacts of the plan on biodiversity:</b> As stated in the 'Issue Papers' the development plan will be subject to environmental assessments and the Department would advise that particular attention should be placed on the requirements of Article 10 of the Strategic Environmental Assessment (SEA) Directive 2001/42/EC, whereby Member States are required to monitor the significant environmental effects of the implementation of plans. Monitoring during plan implementation should allow for corrective action and intervention if environmental damage is noted and it will provide a learning opportunity for practitioners and decision makers for future land use plans. Monitoring can use existing sources of information including data collected by other government departments or agencies but the loss or enhancement of biodiversity due to development can only be adequately monitored and recorded through the planning process. The Department would welcome a clear and specific monitoring plan to be included with the Strategic Environmental Report that would clearly outline how it is proposed to record the impacts of plan implementation on biodiversity, both in terms of biodiversity loss and biodiversity enhancement during the lifetime of the plan. The Department would also welcome the publishing of such reports.</p> <ul style="list-style-type: none"> <li><b>The Department recommends a clear policy objective in the draft CDP:</b> To monitor and record biodiversity loss and enhancement as a result of any development proposals arising from plan implementation and Sligo County Council will ensure such reports are available for public inspection. The Department is available to assist in clarifying any of the observations raised in this submission should this be of further assistance to Sligo County Council in the process of preparing the County Development Plan.</li> </ul>	The SEA and AA will include information on the nature and frequency of monitoring to be carried out and organisations responsible for carrying out the monitoring. Emerging guidance from the EPA will be taken into account in this regard.
<b>L</b>	<p><b>Architecture:</b> The Department recommends that built heritage is considered as an integral part of the wider built environment and should be dealt with holistically throughout the development plan. As part of awareness raising of the county's built heritage resource the Department recommends the appointment of a Conservation Officer with expert skills and practical experience to support the council in its stewardship of the county's rich architectural heritage legacy, to guide and implement policy and best practice in terms of leading heritage-led regeneration, the reuse and the adaptation of historic buildings to climate change, to support the implementation of national grant schemes such as the Historic Towns Initiative, the Irish Walled Towns Network and the Built Heritage Investment Scheme and to support the securing of urban regeneration funding and to coordinate major infrastructural projects i.e. urban regeneration, transport and flood relief works.</p> <p><i>Overview of policy context;</i> The renewal of a number of key national policy documents pertaining to archaeology and built heritage, including (Draft) Heritage Ireland 2030 and the Climate Change Sectoral Adaptation Plan for the Built and Archaeological Heritage, the Built Vernacular Strategy and the National Policy on Architecture (pending), provide the context for this response. The Department welcomes where possible that the policies and objectives of these core documents be inserted into future development plans and notes that research into the symbiotic relationship between cultural heritage and the biodiversity provides opportunities to build capacity as per the National Biodiversity plan 2017 – 2021 actions and the national heritage plan, Heritage Ireland 2030.</p> <p>The development of these new policy documents, position archaeology and built heritage as a central and integrated theme within all government policy, planning &amp; funding frameworks. These new policies are of strategic importance in terms of our alignment with EU policies and funding programmes ensuring resilience in the face of significant challenges particularly the impacts of Brexit, climate change and COVID 19 pandemic. The Department recognises that is an important time to be working collaboratively and strategically with Local Authorities particularly with regard to vulnerable built heritage sites, the safeguarding of vacant buildings and the promoting/enabling reuse and repurposing of existing cultural assets. In this regard, the Department notes the importance of new areas of interest including our built vernacular architecture and its setting both rural and urban, the focus on historic town centres and their vitality post the impact of COVID -19 pandemic and the protection and uniqueness of planned and designed landscapes.</p> <p>The Programme for Government supports the 17 No. Sustainable Development Goals adopted by the United Nations and built on the principle of 'leaving no one behind'. Cultural and natural Heritage as part of the wider built environment is represented by Goal No. 11- make cities and human settlements inclusive, safe, resilient and</p>	<p>This topic will be addressed as relevant in the description (mapped and textual) of the environmental baseline, in Strategic Environmental Objectives, indicators and targets and in the identification of likely significant environmental effects, if any, and in the updating of existing Plan provisions (arising from superseded legislation, guidelines, etc.) and the inclusion of new Plan provisions for environmental protection and sustainable development.</p> <p>The SEA Environmental Report will include information on the architectural heritage of County Sligo, including that relating to designations such as the Record of Protected Structures.</p> <p>The information provided will be integrated into the SEA ER as appropriate. The SEA will seek to ensure that the Plan contributes towards the conservation, protection and management of cultural heritage including architecture.</p>

Ref.	Issue raised in submission	SEA Response
	<p>sustainable. Targets to be achieved are wide-ranging including the adoption and implementation of integrated policies and plans towards 'inclusion, resource efficiency, mitigation and adaptation to climate change, resilience to disasters and implement holistic disaster risk management at all levels', whilst targets for cultural and natural heritage are focused on strengthening its protection.</p> <p>The Sustainable Development Goals speak to formulation of the National Policy on Architecture – Places for People, which is currently progressing with support from several governmental departments and the OPW. The Department recognises the strategic importance of the role of the Local Authorities and the welcomes their leadership of them in implementing the actions of the a National Policy on Architecture; in all aspects of research, design, procurement and communication as the basis for securing funding programmes and delivering a high – quality built environment for everyone particularly in urban areas.</p> <p>Historic urban centres – cities, towns and villages, have become the focus of government due to the negative economic impact of COVID -19 pandemic on urban centres and their communities. Home working imposed by lockdown has seen a desire by many to re-balance live-work arrangements and to improve quality of life and has led them to consider relocation to dwindling country towns to avoid long commutes. These societal shifts are an opportunity for vacant town centre buildings and for Local Authorities to support the reuse of underutilised buildings to meet community needs by putting in place skilled teams to enable appropriate and sustainable development within this context. The Department is supportive of consideration of the quality of the wider built environment as the setting for our lives, our work and recreation and the role of cultural heritage as the infrastructure for societal wellbeing, innovation and for social cohesion. Our built and archaeological heritage provide the structure and form of our historic towns and villages, where cultural layers, buildings and spaces have evolved and continue to develop over time. Our urban places have distinctive characteristics arising from traditional means of construction and craftsmanship and high-quality repairs and upgrade create local employment as well as ensuring climate change resilience and greener performance. The COVID-19 lockdown has demonstrated the importance of cultural and natural heritage sites and their often-shared amenity, which supported well-being in communities particularly in urban centres during the pandemic lockdown. The Department supports the holistic integration of heritage – led strategies to deliver key infrastructural projects such as rural broadband and its sensitive installation in historic towns, the heritage-led regeneration of urban sites and the incorporation of transgenerational housing, accessible services such as health care centres adapting key town buildings and the wider consideration of cultural heritage and the opportunities for its presentation in relation to flood relief works mitigation, upgrade and enhancement</p> <p>The Department welcomes the opportunity for making cultural heritage more accessible and better integrated with wider tourism and recreational opportunities of the county. This will be strategically important to enhancing as well as spreading the tourism capacity through the county's heritage sites and historic towns along the Wild Atlantic Way. The Department supports the integration and communication of multiple strands of cultural and natural heritage, particularly through the implementation of blue and green infrastructural projects that holistically deal with all aspects of archaeological, built and natural heritage. By delivering high quality renewal and enhancement to existing places the social, environmental and economic objectives for sustainable development of communities will be met and cultural heritage significance, conservation best practice, preservation and protection of biodiversity of these places will be raised in general.</p> <p>The Local Authorities leadership in the on-going support of conservation practice and the development of expertise across the heritage sector is of strategic importance in maintaining finite resources and the nurturing of specialist skills and knowledge for guiding maintenance, repair, remaking, adaptation and conservation of built heritage to best conservation practice. It is envisaged that significant development in the skills capacity is required to address conservation / repurposing / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works and to retain regional distinctiveness. In the context of the EU Commission's rebuilding strategies including the Renovation Wave, the renewal of the Leipzig Charter and the EU Urban Agenda and the concept of innovation and collaboration amongst creative classes the New European Bauhaus ( a new culture of building well for everyone drawing on the skills and resources of our time), the Department welcomes the Local Authorities support for research and promotion and communication of appropriate, well-informed energy efficiency design as well as the sensitive upgrades to historic buildings through the dissemination of factual and relevant information to the general public. By reusing, repairing, adapting and upgrading buildings in a sensitive and holistic way communities will be supported to</p>	

Ref.	Issue raised in submission	SEA Response
	<p>move towards a low-carbon society achieving a circular economy integral to supporting local craftsmen and trades. This approach will support heritage-led regeneration, address vacancy and heritage loss and support communities to undertake built and archaeological heritage projects of high quality design and conservation.</p> <p>In summary there are a number of new areas of interest that the Department consider require greater attention and focus in future development plan and policies of Local Authorities including;</p> <p>a. National Policy on Architecture (NPA) – The priorities of the National Policy on Architecture are categorised into three critical areas to illustrate the synergies and supports that the NPA can provide to the implementation of Project Ireland 2040, specifically to National Planning Framework and also to the National Development Plan. These areas are: strengthening the evidence base (research and education); utilisation (capacity, leadership and innovation) and benefits (environmental, social and cultural awareness and appreciation).The National Policy has objectives addressing key issues including societal well-being, climate change and urban regeneration. The adaptation of existing as well as the design of new buildings will be critical to meet the targets set by the Climate Action Plan. It will play an integral part in implementing the State’s vision for the future, providing policy actions that will encourage best quality in researching, understanding, managing, enhancing and reusing our existing built environment assets as well as delivering sustainable new places and spaces. The consultation phase highlighted the importance of knowledge, leadership, innovation and communication to delivering high quality, generous and accessible places and spaces. This vision is carried through four objectives which summarise the environmental, social, economic and cultural benefits of high quality architecture and built environment:</p> <ul style="list-style-type: none"> <li>• Design places for climate neutrality, climate resilience, circularity and sustainability</li> <li>• Design quality architecture and spaces for everyone</li> <li>• Advocate for leadership to prioritise quality architectural outcomes</li> <li>• Foster cultural awareness of architecture as both art and science, which adds value for people, place and planet.</li> </ul> <p>This report is to be published 2021.</p> <p>b. Heritage Ireland 2030 (pending)– 3 strands to be embedded and the importance of communication, digital opportunities and community engagement as part of the delivery of built heritage policies.</p> <p>c. National Inventory of Architectural Heritage – Cultural landscapes, vernacular architecture and early urban buildings to address the incremental damage and cultural loss of early settlements and their settings due to the lack of awareness, vacancy and demolition.</p> <p>d. Built Vernacular Strategy (pending) to enhance the understanding, minding and handing-on of our built vernacular.</p> <p>e. Pleasure landscape – the inclusion of policies for planned/designed landscapes their long terms survival and evolution.</p> <p>f. Climate Change Action – delivering built heritage resilience and sustainability as part of the overall response to climate change, consideration of appropriate measures to ensure the long term survival of historic structures, significant heritage sites as well as traditional buildings to ensure their appropriate thermal upgrade, reuse and contribution to the sense of place.</p> <p>g. Town revitalisation - Enhanced policies for heritage-led urban regeneration based on an understanding of their cultural layering/transmission of cultural significance/high quality adaptation, condition, reuse and renewal of historic fabric and remaking of vibrant historic places as a key objective of Project Ireland 2040.</p> <p>i. The identification, reuse and repair of early urban buildings – raising awareness of the cultural significance of early building fabric as an integral part of historic urban centres and supporting the develop of multi-disciplinary practice between archaeologist and conservation experts.</p> <p>ii. Flood Relief works – attenuation, upgrading and repair of existing infrastructure, high quality design of new infrastructure and coordination with public realm/recreational amenity in urban centres</p> <p>iii. Tall buildings in historic urban centres – mitigation of negative impact on historic character areas and urban landscape in relation to large ground scappers as well as tall buildings through the consideration of design criteria and guidance to safeguard the historic built heritage context.</p> <p>The renewal of Local Authority development plans is timely in terms of the global climate change challenges and presents opportunities for the potential of built heritage to be fully considered in future county development plans as a central theme. The impact of climate change is already been focused through Local Authority Climate Action Regional Offices (CARO) on urban settlements, their resilience, adaptation and consolidation. The Department welcomes the Local Authority initiating research,</p>	

Ref.	Issue raised in submission	SEA Response
	<p>implementing policy, raising awareness and providing guidance to owners of historic buildings on such issues as thermal upgrading and building repair requires in-house expertise to provide coherent and coordinated advice and a key recommendation is the appointment of key resources such as Conservation Architect, Archaeologist and Heritage Officer to undertake the delivery of the Department's policies.</p> <p><b>The following themes are recommended for inclusion along with objectives and policies that accord with the 'Built Heritage' to be coordinated:</b></p> <p>Local Authority Climate Change Adaptation Strategy:</p> <p>Under the Climate Action and Low Carbon Development Act 2015, the Department prepared a climate change adaptation sectoral plan for the Built and Archaeological Heritage and engaged with the Climate Action Regional Offices (CAROs) through a Climate Change Advisory Group to ensure a consistent approach to protection and adaptation of heritage across the country. Ongoing engagement with the CAROs is welcomed to assist the successful implementation of the built and archaeological heritage sectoral plan.</p> <p>While the architectural heritage of this country has survived well in the past, changing climatic conditions may make it less able to cope. Climate change can alter and accelerate decay or can overwhelm the capacity of older structures to deal with severe weather events, increased extremes of wetting and drying, or cold or heat. There is also a significant threat to architectural heritage from climate action posed by maladaptation, i.e. poor quality or illadvised adaptation works leading to damage to heritage, whether directly or indirectly.</p> <p>In the preparation of the local authority adaptation strategies, there are a number of issues regarding protection of architectural heritage that it is recommended should be taken into account to identify the architectural heritage at risk in its area, to assess its vulnerability to climate change and develop disaster risk reduction policies for direct and indirect risks. For example, the strategy should undertake to:</p> <ul style="list-style-type: none"> <li>• Identify the architectural heritage in the local authority area, which may be under threat, directly or indirectly, due to climate change. This should include, but not necessarily be restricted to, the protected structures and architectural conservation areas designated in the local authority Development Plan but also contextual buildings that provide the setting for significant heritage sites. It is noted that due to the COVID -19 lockdown of urban centres that many town buildings have been left vacant and inaccessible and many may struggle to re-open. Buildings that are left with poorly forming rainwater goods, roof coverings and badly secured will be very vulnerable in inclement weather. <ul style="list-style-type: none"> <li>○ Include objectives to carry out climate change risk assessments for the historic structures and sites in the local authority's functional area particularly those in the authority's own remit.</li> <li>○ Include objectives to develop disaster risk reduction policies addressing direct and indirect risks to the architectural heritage in its area.</li> <li>○ Include objectives to develop resilience and adaptation strategies for the architectural heritage in its area.</li> <li>○ Develop the skills capacity within the local authority to address adaptation / mitigation / emergency management issues affecting historic structures and sites in order to avoid inadvertent loss or damage in the course of climate change adaptation or mitigation works.</li> </ul> </li> </ul> <p>It is recommended that, where such officers are employed, the architectural conservation officer and/or heritage officer should be included on the local authority's Adaptation Steering Group.</p> <p><u>The revitalisation of Historic Urban Centre – cities, towns and villages:</u></p> <p>The Department is a key stakeholder in promoting the revitalisation of historic urban centres and has had a central role in the development of innovative town centre first policy (pending), and integral to that heritage-led regeneration and best practice in the reuse of existing buildings and the development of high quality public realm, approaches which have been supported through annual funding programme of the Heritage Council for towns and their building fabric. In support of the vision of the National Development Plan, the Department is developing a National Policy on Architecture (NPA), under several themes, all of which are applicable to the future sustainable development of town centres i.e. research strategies required to inform planning and development, heritage-led regeneration and climate change adaptation and the design of high quality places for people. During the consultation phase of the NPA, the Department, has received many significant contributions and presentations - the Collaborative Town Health Check Programme (CTHCP) demonstrated its strategic importance to informing future town management policy by providing the point of engagement with a business community, the compilation of baseline data for</p>	

Ref.	Issue raised in submission	SEA Response
	<p>assessing and visualising the well-being, quality and economic vitality of a town centre and allowing comparison to be made with European counterparts on the significance of the current vacancy rates presenting in Irish towns, pre COVID -19 lockdown. The Department welcomes the establishment of baseline data for town centres and its use to inform future heritage-led development strategies based on enabling and reuse of under-utilised buildings.</p> <p>As Ireland emerges from lockdown, the Government has acknowledged the need to provide economic stimulus to assist society in its recovery. The EU is similarly posed to providing support to Member States with policies and funding being aligned to deliver the upgrade existing building stock as an integral part of climate change adaptation, town revitalisation and economic prosperity. The Department's built heritage grant schemes have been revised to tackle climate change resilience and to gather information to inform future funding strategies and practices for towns. The Architectural Conservation Officer has a key role in the implementation of such scheme, communicating their benefit, developing best practice and supporting traditional skills to retain the local character.</p> <p>Acknowledging that a greater percentage of inhabitants now live in urban centres than the countryside, urban centres provide the opportunity to focus on the challenges and opportunities that climate change adaptation and the re-purposing of our extant building stock will bring. Historic building refurbishments and conversions in small settlements and rural areas have helped to accommodate new uses, facilitating rural economic diversification. Historic areas often provide the focus for leisure facilities, from theatres and art installations to restaurants and bars. Historic buildings, areas and waterways can serve as catalysts for the repopulation of inner-city areas and development of new and sometimes more specialised housing, retail and leisure markets.</p> <p>Programmes such as the CTHCP health check surveys provide the imperative to the Local Authority as well as the basis to become more attentive of the well-being of towns as providing an understand of the opportunity to focus through a single lens and to ascertain the benefit of interconnecting government policies and funding to greater effect and benefit of rural society. The adoption of governance tools within Local Authorities such as the Health Check Programme, Conservation Plans for special sites, Living Town Initiatives and their respective setting up of one-stop –shops to promote and coordinate the planning and building regulatory aspects of urban regeneration is regarded as a positive and proactive means to enabling built heritage to be reused and adapted successfully, It is a planning model that may be applied to the various scale of urban settlement as necessary.</p> <p><u>Policy:</u></p> <p>To consider concepts of historic urban landscapes as a collection of buildings at the various scales of settlement, the origins of Irish cities, towns and villages which give rise to their special characteristics. These include setting, topography and natural features. The conservation and reuse of early traditional structures, roofscapes of historic centres and the recognition of interrelationships between sites and landscape features in terms of the insertion of new buildings and managing their impact on the historic environment.</p> <p>To consider a Town Centre First approach to the revitalisation of historic urban centres, the appointment of a Local Authority multi-disciplinary team which communicates the historical, architectural context and focuses on the repair and upgrade of existing historic buildings and their adaptation to new uses with regard to their architectural character and significance.</p> <p>To promote the development of heritage-led regeneration, to plan for the reuse and conservation of core built heritage and archaeological sites within urban centres as an integral part of the evolution of the historic place and its significance.</p> <p>To consider the identification of built heritage at risk registrar as the basis for actively managing, attracting funding and resources, drawing on the legislative provisions to safeguard protected structures and their setting i.e. enabling works to ensure their long terms survival, appropriate moth-balling and inspection to prevent further deterioration or loss.</p> <p>To promote best conservation practice and to lead by example through the management and safe-guarding of historic properties in the ownership of the Local Authority.</p> <p>To support the development of sustainable infill to the town back lands that is appropriate in scale and character to that of the historic centre, that transitions and accommodates surviving structures and retain the historic streetscape form particularly within sensitive areas of built and archaeological importance. To ensure the strategic housing development support rather than detract from the vitality and overall character of historic town centres in terms of their scale, connection and mobility strategies.</p>	

Ref.	Issue raised in submission	SEA Response
	<p>To draw on the historic environment viewer, to compile core data information about the built and archaeological evolution of historic places to draw on the readily accessible resources such as historic mapping and databases, i.e. to inform future development strategies and progress based on an awareness of the cultural significance of a place.</p> <p>To coordinate significant infrastructural projects such as public realm works, flood relief works or new transport routes and alternative modes of transport to the benefit of surviving historic sites in order to improvement their enjoyment, presentation and enhanced accessibility. The Department notes, in this regard, examples from European counterparts of the removal of traffic from urban centres and the resulting improvement in air quality which has been exemplified by the recent COVID-19 lockdown and the perceived enjoyment of urban living in Ireland. These transitions support a return to sustainable and attractive urban living.</p> <p><u>The National Inventory of Architectural Heritage (NIAH):</u> Under Section 53 of the Planning and Development Acts 2000-2012, the Minister, may, in writing, make recommendations to a planning authority concerning the inclusion of particular structures, specific parts of particular structures, or specific features within the attendant grounds of particular structures for inclusion in local authority Records of Protected Structures. Local authorities must have regard to such recommendations, where they relate to structures recorded by the National Inventory of Architectural Heritage (NIAH) and rated as being of International, National or Regional significance. In development planning, any proposals for development must take account of the possible impact on the historic interest of these structures. If the Council, after considering a recommendation made by the Minister, decides not to comply with the recommendation, it must inform the Minister in writing of the reason for its decision.</p> <p>In the case of Sligo County Council, the Minister has recommended a number of sites for inclusion in the Record of Protected Structures. To date, the Council has included a number of sites as Protected Structures in their own right and as part of Architectural Conservation Areas. The structures that are not formally protected benefit from a form of protection through Section 53(2) of the legislation, which allows the planning authority to have regard to the Minister's recommendations where a building is subject to a planning application. The purpose of the NIAH is to identify, record and evaluate the post-1700 architectural heritage of Ireland, uniformly and consistently, as an aid in the protection and conservation of the built heritage. A key part of the work of the NIAH is to raise awareness of the richness of the architectural heritage and in this regard, the NIAH maintains a website, <a href="http://www.buildingsofireland.ie">www.buildingsofireland.ie</a>, that features all structures recommended by the Minister, in descriptive, photographic and map form. This website is also a useful link to a range of other material, including information about grants, and downloadable publications relating to practical buildings conservation. The NIAH has produced illustrated books for all counties and cities, constituting short introductions to the architectural heritage.</p> <p>While the NIAH has carried out surveys for all counties, such surveys are representative rather than comprehensive. It is envisaged that all counties will be updated over time, with further ministerial recommendations for inclusion in the Record of Protected Structures.</p> <p><i>Policy:</i> To consider the inclusion of all structures identified by the National Inventory of Architectural Heritage (NIAH) and recommended by the Minister for the Department of Housing, Local Government &amp; Heritage (D/HLGH), in the Local Authority's Record of Protected Structures. To consider that all such structures be regarded as 'Candidate Protected Structures', pending verification by the Council and inclusion in the Record of Protected Structures. To direct users of relevant local authority services to the information resources of the NIAH website <a href="http://www.buildingsofireland.ie">www.buildingsofireland.ie</a>.</p> <p><u>Built Vernacular Architecture:</u> Vernacular architecture is rooted in our traditions and accumulated wisdom and encapsulates our identity. It is characteristic of local communities and environments. Many vernacular houses and farmyards are maintained with pride by their owners, while contributing to the aesthetic appearance of the landscape, with benefits for wellbeing, tourism and the local economy. Importantly, our vernacular architecture also contributes to the world's cultural diversity.</p> <p>The majority of surviving vernacular buildings, date from the eighteenth and nineteenth centuries, although older examples are also known; the majority of unnamed buildings on the early Ordnance Survey maps are vernacular. Due to the spread of urban centres previous stand-alone structures may have merged with the urban conglomeration and awareness of their importance is diminished. Houses are</p>	

Ref.	Issue raised in submission	SEA Response
	<p>commonly small and single-storey, but may be lofted, and there are two-storey examples; all have relatively low wall-head and door heights and small, irregularly-placed windows; and many have corrugated-iron roofs (perhaps over thatch). The interiors of such houses, particularly the old kitchen and hearth, are essential to their character. Other building types include the most numerous, farm buildings, but also include, for example, settlements and groupings of farmyards, small-scale industrial items (e.g. limekilns, mills, culm crushers), field systems and lazy-beds, some piers/quays, boat pens, field paths, mass houses, holy wells (and similar features) and stones and other natural features with traditional associations.</p> <p>Vernacular buildings were constructed by the occupants, users and neighbours and thus no two can be exactly alike. This characteristic extends to house internal layouts, walling and roofing materials, farmyard forms, and even whole settlements. The vernacular tradition differs greatly from formal architectural design, this latter being created by professional builders and designers, influenced by imported styles, and includes most high-status dwellings, public buildings and even social housing.</p> <p>Vernacular buildings, through their siting, orientation and materials, display an intimate connection with their landscape. Natural materials, including field or quarried stone, mud and sometimes local brick for walls; wattles for hearth canopies and partitions; straw, reed and other vegetable materials and stone flag or slate for roofs and floors; and timber from the bog or hedgerow are all distinctively local. Corrugated iron, despite its origins, has become part of the vernacular palette. Vernacular building crafts also have a local or regional character, and the work of the blacksmith, for example, is evident in hearth cranes, farm equipment and gates.</p> <p>Vernacular materials and methods are most appropriate for the repair of vernacular buildings, but also offer potential for new work. Vernacular buildings are inherently good in terms of energy efficiency, with openings placed to maximise light but minimise heat loss, and thick walls that retain heat and gradually release it, and absorb moisture and release it easily, allowing them to 'breathe'. Some modern practices and products, such as use of impermeable materials and making spaces too airtight, can be harmful and simpler, low-tech solutions are almost always better.</p> <p>Vernacular settlements survive in many counties, usually as farming or fishing hamlets and comprise small groups of houses and yards arranged in a deceptively haphazard manner.</p> <p>They frequently have an attractive visual character and atmosphere and some may have medieval origins.</p> <p>Thatch covers some older (and some recent) buildings, but now often survives better under corrugated iron. Loss of historic thatch layers and roof structures also represents a loss for agricultural and botanical heritage. Regular maintenance is essential and costs can be considerable, although there is a thatching grant available from the Department of Housing, Local Government and Heritage (D/HLGH) and Heritage Council might also provide financial assistance.</p> <p>Our stock of vernacular architecture has diminished alarmingly in recent decades, with many buildings neglected or replaced, due to changing aspirations and demands. Viable new uses and careful rehabilitation can contribute to sustainable development and encourage social and economic regeneration. The Government Policy on Architecture 2009–2015 encourages the sustainable reuse of the existing building stock, whether or not such buildings have protected status, and this is particularly pertinent to vernacular architecture.</p> <p><u>Policies and objectives:</u></p> <p><b><i>In high-level introduction to development plan</i></b> Recognize that vernacular buildings are characteristic of our local communities and environments and contribute to their authenticity, and to their cultural, traditional, architectural, archaeological, historical and social interest and diversity. Promote the appropriate rehabilitation, revitalization and reuse of vernacular buildings, wherever feasible, employing best conservation practice and using traditional, especially vernacular, building methods and materials.</p> <p><b><i>Rural housing/settlement policy</i></b> Proposals for sensitive rehabilitation of disused vernacular houses will not be subject to the Rural Settlement Strategy for housing in the countryside that applies to new dwellings, assuming that their vernacular character is not compromised, that their fabric is repaired using appropriate techniques and materials, and that the structure was previously a dwelling. Where a building is derelict, measures should be taken to support and protect the building from collapse prior to and during works. There will be a presumption against the demolition of vernacular buildings where restoration or adaptation is a feasible option. To consider the uniqueness of vernacular buildings and ensembles in terms of their focused and specific relationship with their immediate environment as a model and guide for the development of modern design approaches in rural and other appropriate settings.</p>	

Ref.	Issue raised in submission	SEA Response
	<p><b><i>Climate change and sustainability/energy efficiency</i></b>  To recognize the inherent sustainability of vernacular buildings by virtue of their use of natural and renewal materials of local origin.  To ensure the continued sensitive and appropriate rehabilitation and reuse of vernacular buildings in the interest of sustainability.  To ensure the conservation and reuse of traditional materials in the interest of sustainability, good conservation practice and maintaining the long-term viability of such buildings and their associated features.  The retention and careful rehabilitation of historic buildings in our landscapes, including vernacular houses and other structures, whether urban or rural, allows the materials and embedded energy of these structures to be harnessed for present and future generations. Removal and replacement of such buildings represents a waste of their embedded energy and such proposals should be subject to rigorous scrutiny. Where permission is sought to demolish a vernacular building on the grounds of structural defects or failure, or that it is not reasonably capable of being made structurally sound, such a contention must be convincingly demonstrated through a detailed report on the existing condition produced by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. As part of such justification, details will be required of remedial works normally used in similar circumstances and setting out why these would not be appropriate.  Where a building has been destroyed by fire or accident, the Council may consider demolition to be appropriate, but a report by a professional with appropriate conservation expertise, specifying the cause and extent of damage, will be required. As a minimum, a vernacular building proposed for demolition should be fully recorded to an agreed professional standard. If a disused vernacular house is demolished or replaced with a replica, the Rural Settlement Strategy will apply.  Ensure that measures to upgrade the energy efficiency of vernacular buildings acknowledge their inherent vernacular characteristics, techniques and materials and do not have a detrimental physical or visual impact.  Promote and support appropriate and well-informed energy efficiency upgrades to vernacular buildings through the dissemination of factual and relevant information to the general public.</p> <p><b><i>Rural development/farm diversification/tourism</i></b>  Encourage and facilitate the sensitive reuse of vernacular houses or farm buildings for farm diversification, agri-tourism and rural development, including self-catering accommodation, arts or craft workshops and small-scale manufacturing. Guidance and information can be found in Traditional Buildings for Irish Farms (2005) published by the Heritage Council and Teagasc, and Reusing Farm Buildings: A Kildare Perspective (2006) published by Kildare County Council.</p> <p><b><i>Architectural heritage/conservation</i></b>  To protect, maintain and enhance the established character and setting of vernacular buildings, farmyards and settlements.  Development proposals affecting vernacular buildings will be required to be accompanied by a detailed measured survey, photographic record and written report carried out by a professional with appropriate conservation expertise and, preferably, an understanding of vernacular buildings. Early consultation with the planning authority is strongly advised.  Facilitate appropriate, high-quality design solutions for adaptations of vernacular buildings that carefully consider their vernacular qualities in terms of design, scale, setting and finishes. While new design can be expressed in contemporary architectural language, consideration should be given to exploring the use of appropriate vernacular features, building techniques and materials.  Where it is proposed to extend a vernacular house, the design, scale, footprint and materials should be sympathetic to the existing building and its setting. Extensions should generally be located to the rear and not obscure the form or layout of the existing building; substantial removal of walling is not generally recommended; connecting the existing building and extension should minimize the number of new openings and ideally use existing openings; sometimes, an outbuilding contiguous to a dwelling can be successfully incorporated.  Promote the protection and maintenance of the character and setting of vernacular buildings, farmyards and settlements, including historic gateways, boundaries and other features.  Ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.  Promote the protection and maintenance of thatched buildings (domestic or non-domestic), particularly those with historic layers and roof structures.</p>	

Ref.	Issue raised in submission	SEA Response
	<p>To maintain an up-to-date record of thatched buildings, promote available grant schemes and facilitate engagement with owners in the maintenance of these buildings.</p> <p><b>Rural settlement/architectural conservation</b></p> <p>Consider the protection of vernacular settlements by means of Architectural Conservation Area designation, promote the reuse of disused or unoccupied buildings within them, and ensure that developments proposed within or adjacent to vernacular settlements respect and enhance their spatial character, building forms, features, details and materials.</p> <p><i>National Inventory of Architectural Heritage – Garden Survey/Cultural Landscapes:</i></p> <p>The National Inventory of Architectural Heritage (NIAH) has compiled a record of significant historic designed landscapes, demesnes and gardens throughout the country. The objective is to begin a process of understanding and appreciating the extent of this rich heritage.</p> <p>County Sligo boasts a significant number of such places. A notable example such as Sligo Abbey or Carrownacreevy, thatched house, are considered as county highlights in the NIAH Survey - Buildings of Ireland<sup>17</sup> Other historic places may include private gardens, public parks or landscapes associated with country estates and demesnes.</p> <p>The Department recognises the contribution that these planned landscapes make to the appearance of the countryside, and their significance as a source of information about history and society in the county. These places also hold significant resources for biodiversity because of their wide range of habitats, whether open grassland, water courses and open water, woods and copses, and old buildings and walls. Our designed landscapes, demesnes and gardens provide havens for an enormous variety of animal and plant species and, through careful enhancement and rehabilitation, these can offer significant potential for enhancing biodiversity more generally. Importantly, such places are also helping to mitigate the effects of climate change. Where such places are open to the public, they offer tremendous opportunities in terms of mental and physical health and wellbeing through being in close contact with nature.</p> <p>Since medieval times, demesnes were lands retained by a lord for his own use and occupation, with associated gardens and places for food provision, such as orchards, pigeon houses, rabbit warrens and fishponds, adjacent to the principal residence. Over time, demesnes were developed to include 'naturalistic' parkland, woodlands and additional buildings, such as gate lodges and follies.</p> <p>These historic designed landscapes, demesnes and gardens may not be in the Record of Protected Structures per se, although various constituent elements may be included. Elements of such places include: the demesne house and outbuildings, gates and boundary walls, avenues, walled gardens and pleasure gardens/landscapes, glasshouses and orangeries, icehouses, pigeon-houses, bridges and follies, private chapels, graveyards and mausolea, canals, lakes and duck and fishponds, rabbit warrens, tree-rings, copses, coverts and plantations; also associated features built by the owners of these places (such as workers' houses, schools, etc.). These habitats contain collections of plants and specimen trees that may be of national or international botanical importance and interest. They may also be of significant historical and aesthetic interest, or illustrate aspects of the development of gardening and of gardens and parks, providing insights into changes in society over time.</p> <p>Cork County Council has produced a document, Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings<sup>18</sup> that is an attractive guide for understanding designed landscapes and, in the case of development proposals, facilitating the preparation of appraisals of historic gardens and designed landscapes and possible impacts on their heritage value.</p> <p>Creative Ireland have recently produced a publication in support of Historic Irish Houses – '<i>Historic Irish Houses A Creative Reappraisal</i>'</p> <p><u>Policies:</u></p> <ul style="list-style-type: none"> <li>• To identify significant historic designed landscapes, demesnes and gardens for protection under the development plan.</li> <li>• To designate Architectural Conservation Areas, where considered appropriate, in order to preserve the character of historic designed landscapes, demesnes and gardens.</li> <li>• To identify and protect significant views to or from such places.</li> <li>• To encourage the compilation of Conservation Plans for the long term conservation and</li> <li>• management of cultural landscapes and their components in the ownership of the Local Authority/State.</li> <li>• To cooperate with the National Inventory of Architectural Heritage in assessing and celebrating historic designed landscapes, demesnes and gardens.</li> </ul>	

Ref.	Issue raised in submission	SEA Response
	<ul style="list-style-type: none"> <li>• To encourage and facilitate the retention and careful maintenance of these places and the various components set out in the introduction above.</li> <li>• To encourage the cataloguing of plant collections, trees and habitats within these places to appropriate national standards.</li> <li>• To encourage the cataloguing of fauna within these places to appropriate national standards.</li> <li>• To protect and promote heritage and traditional varieties of plants and trees within our historic designed landscapes, demesnes and gardens.</li> <li>• To promote public awareness, enjoyment of and access to these sites and to seek the cooperation and assistance of other interested parties, including Government Departments and state agencies, in this regard.</li> <li>• To preserve and protect the biodiversity of these places and, where appropriate, to encourage the enhancement of the range of plant and animal species, in order to add to local, regional and national biodiversity.</li> <li>• To promote conservation, renewal and improvement that enhances the character and setting of historic designed landscapes, demesnes and gardens and of former examples of such places, and to resist proposals or developments that would lead to the loss of, or cause harm to the character, principal components, or setting of these places.</li> <li>• To require a detailed appraisal of the potential impacts of any development proposed for within or adjacent to these places, or that might affect its setting. A methodology for preparing such an appraisal can be found in the Guidance Notes for the Appraisals of Historic Gardens, Demesnes, Estates and their Settings (Cork County Council, 2005). Applicants for proposed large-scale developments within historic designed landscapes, demesnes and gardens may be required to produce 3D Digital Survey Modelling to demonstrate that the proposed development does not adversely affect the site or its setting.</li> <li>• To have regard to Guidance Notes for the Appraisal of Historic Gardens, Demesnes, Estates and their Settings (2006) published by Cork County Council and to the Architecture Heritage Protection Guidelines (2011) published by the Department of Culture, Heritage and the Gaeltacht<sup>20</sup> in the appraisal and description of historic designed landscapes, demesnes and gardens.</li> </ul>	

## **Section 2 Details on the Likely Content of the Draft Plan**

The Draft Sligo County Development Plan 2023-2029 will be prepared over the coming months. The Plan will provide a six-year framework for the sustainable development of the County, while considering the conservation and protection of the built and natural environment. It will set out an overall strategy for the proper planning and development of County Sligo in terms of social, cultural, economic and physical development and will consist of a written statement supported by mapping and other appendices indicating the development objectives for the County.

The preparation of the Plan will be informed by a process of public participation and consultation. The Plan represents an important policy document that will form the foundations to support and facilitate new housing, transport, economic development and social, community and educational facilities, while at the same time protecting natural and built heritage.

The Plan will be set within the context of the strategic framework of and be guided by the National Planning Framework and the Regional Spatial and Economic Strategy for the Northern and Western Region. The Plan will consist of a written statement and accompanying maps including a Core Strategy, Policies and Objectives in order to contribute towards balanced and sustainable growth in County Sligo over the Plan period and beyond.

Sligo County Council's Issues Paper for Pre-Draft Consultation (2021)<sup>10</sup> provides more detail on the likely content of the emerging Draft Plan.

---

<sup>10</sup> Available at: <https://consult.sligococo.ie/en/consultation/pre-draft-consultation-preparation-sligo-county-development-plan-2023-2029>

## Section 3 Scope of Environmental Baseline Data to be used in the Assessment

### 3.1 Introduction

The SEA Environmental Report that will accompany the Draft Plan on public display will include information on state of the environment in the County, including maps of individual environmental components, environmental sensitivity mapping and a description under the topics identified by the SEA Directive and transposing Regulations (i.e. biodiversity and flora and fauna, population and human health, soil, water, air and climatic factors, material assets, cultural heritage and landscape). The SEA Environmental Report will consider the zone of influence for the Plan and will include baseline information beyond the Plan boundary for certain environmental components e.g. European sites and the landscape character areas and protected views and prospects of adjacent planning authorities.

### 3.2 Biodiversity and Flora and Fauna

The SEA will consider available information on designated ecological sites and protected species<sup>11</sup>, ecological connectivity (including stepping stones and corridors) and non-designated habitats. The SEA will also identify data sources that may be appropriate to local, project-level development and assessments.

Information to be considered by the SEA under this topic includes:

- Special Areas of Conservation (SACs)<sup>12</sup> and Special Protection Areas (SPAs)<sup>13</sup>;
- Natural Heritage Areas (NHAs)<sup>14</sup> and Proposed Natural Heritage Areas (pNHAs)<sup>15</sup>;
- Certain entries to the Water Framework Directive Register of Protected Areas<sup>16</sup>;
- Wildfowl Sanctuaries (see S.I. 192 of 1979)<sup>17</sup>;

<sup>11</sup> Protected species including: Annex IV (Habitats Directive) species of flora and fauna, and their key habitats (i.e. breeding sites and resting places), which are strictly protected wherever they occur, whether inside or outside the above sites, e.g. Otter and bats; Other species of flora and fauna and their key habitats which are protected under the Wildlife Acts 1976-2000, wherever they occur; 'Protected species and natural habitats' as defined in the European Liability Directive (2004/35/EC) and European Communities (Environmental Liability) Regulations, 2008, including: Birds Directive – Annex I species and other regularly occurring migratory species, and their habitats (wherever they occur) and Habitats Directive – Annex I habitats, Annex II species and their habitats, and Annex IV species and their breeding sites and resting places (wherever they occur).

<sup>12</sup> Designated under the Habitats Directive (Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora). **There are twenty SACs designated within or partially within County Sligo (Source: NPWS), including: Bunduff Lough and Machair/Trawalua/Mullaghmore SAC (000625); Ben Bulbin, Gleniff and Glenade Complex SAC (000623); Cummeen Strand/Drumcliff Bay (Sligo Bay) SAC (000627); Unshin River SAC (0001898); and Ox Mountains Bogs SAC (002006). These and other sites beyond the County border, that could be affected by the Draft Plan, will be considered by the assessments.**

<sup>13</sup> Designated under the Birds Directive (EC Directive 200/147/EC on the conservation of wild birds). **There are eleven SPAs designated within or partially within County Sligo (Source: NPWS), including: Sligo/Leitrim Uplands SPA (004187); Ardboline Island and Horse Island SPA (004135); Aghris Head SPA (004133); Inishmurray SPA (004068); and Lough Arrow SPA (004050). These and other sites beyond the County border, that could be affected by the Draft Plan, will be considered by the assessments.**

<sup>14</sup> NHAs are designated due to their national conservation value for ecological and/or geological/geomorphological heritage. They cover nationally important semi-natural and natural habitats, landforms or geomorphological features, wildlife plant and animal species or a diversity of these natural attributes. NHAs are designated under the Wildlife (Amendment) Act 2000. **There are three NHAs designated within or partially within County Sligo (Source: NPWS): Carrane Hill Bog NHA (002415); Crockauns/Keelogyboy Bogs NHA (002435); and Slieveward Bog NHA (001902). These and other sites beyond the County border, that could be affected by the Draft Plan, will be considered by the assessments.**

<sup>15</sup> pNHAs were published on a non-statutory basis in 1995, but have not since been statutorily proposed or designated. These sites are of significance for wildlife and habitats. **There are over 30 pNHAs designated within, partially within or adjacent to County Sligo (Source: NPWS), including: Dunneill River pNHA (001664); Lough Hoe Bog pNHA (000633); Quarryfield West Turlough pNHA (0001901); Union Wood pNHA (000638); and Streedagh Point Dunes pNHA (001680).**

<sup>16</sup> These areas are those identified as those requiring special protection under existing national or European legislation, either to protect their surface water or groundwater, or to conserve habitats or species that directly depend on those waters. **Various entries to these registers are found within and adjacent to County Sligo.**

<sup>17</sup> Wildfowl Sanctuaries are areas that have been excluded from the 'Open Season Order' so that game birds can rest and feed undisturbed. There are 68 sanctuaries in the State. Shooting of game birds is not allowed in these sanctuaries. **Wildfowl Sanctuaries within/partially within the County include: Lough Gara (WSF-48) and Drumcliff Bay (part) (WSF-49).**

- Ramsar Sites<sup>18</sup>;
- OSPAR Sites<sup>19</sup>;
- Nature Reserves<sup>20</sup>;
- Freshwater pearl catchments<sup>21</sup>;
- Shellfish Waters<sup>22</sup>;
- Salmonid Waters (S.I. No. 293 of 1988)<sup>23</sup>;
- Flora Protection Order (FPO)<sup>24</sup> Sites;
- CORINE Landcover<sup>25</sup>;
- Watercourses, wetlands<sup>26</sup> and peatlands data; and
- Other sites of high biodiversity value or ecological importance<sup>27</sup>.

Potential overlaps in designations and settlements/zoning will be closely scrutinised by the SEA and AA. There are many sites of importance to birds and it will be important to also consider the wording associated with the zoning of lands adjacent to these sites.

The SEA will be informed by the findings of the AA (see Section 1.3.2) and will follow elements of Integrated Biodiversity Assessment with reference made to the EPA's 2013 *Integrated Biodiversity Impact Assessment - Streamlining AA, SEA and EIA Processes: Practitioner's Manual*.

### 3.3 Population and Human Health

In the 2016 Census the total population of County Sligo was 65,535 persons. The NPF Implementation Roadmap provides a transitional set of population projections to inform city and county development plans for the periods to 2026 and to 2031. For County Sligo, the projected future population is circa 71,500-72,500 by 2026 and 74,000-75,500 by 2031.

Sligo Town is Sligo's County Town and the largest settlement in the County with a population of 19,199 persons and is designated in the Regional Spatial and Economic Strategy for the Northern and Western

<sup>18</sup> Ramsar Sites are designated and protected under the Convention of Wetlands of International Importance, especially as Water Fowl Habitat, which was established at Ramsar in 1971 and ratified by Ireland in 1984. Ireland presently has 45 sites designated as Wetlands of International Importance, with surface areas of 66,994 hectares. The objective of a Ramsar site is the conservation of wetlands for wildfowl. While Ireland ratified the Ramsar Convention in 1984 there is no legal backing for Ramsar sites unless they are also Nature Reserves or SPAs and as such are protected by the Wildlife Acts 1976 and 2000 or the Birds or Habitats Directives. **There are four Ramsar Site located within/partially within the County: Killala Bay/Moy Estuary; Easky Bog; Lough Gara; and Cummeen Strand.**

<sup>19</sup> Under the OSPAR Convention to Protect the Marine Environment of the North East Atlantic, Ireland committed to establishing marine protected areas to protect biodiversity (OSPAR MPAs). There are currently 19 OSPAR MPAs in Ireland, which established a number of its cSACs as OSPAR MPAs for marine habitats. **There is one OSPAR MPA partially within/adjacent to the County Sligo coastline: Cummeen Strand/Drumcliff Bay (Sligo Bay) MPA.**

<sup>20</sup> A Nature Reserve is an area of importance to wildlife, which is protected under Ministerial order. There are currently 78 Statutory Nature Reserves. Most are owned by the State but some are owned by organisations or private landowners. **There are three Nature Reserves designated within the County: Easky Bog; Union Wood; and Ballygilgan (Lissadell).**

<sup>21</sup> Freshwater pearl mussel is a globally threatened, long-lived and extremely sensitive species that can be impacted by many forms of pollution, particularly sediment and nutrient pollution and by hydrological and morphological changes, which may arise from developments, activities or changes in any part of the catchment. **Within County Sligo, these areas are found within the Easky and Moy river catchments.**

<sup>22</sup> In order to protect existing shellfish waters and to ensure the future protection of these areas, the European Union introduced the Shellfish Waters Directive (2006/113/EC). The purpose of this Directive is to put in place concrete measures to protect waters, including shellfish waters, against pollution and to safeguard certain shellfish populations from various harmful consequences, resulting from the discharge of pollutant substances into the sea. The Directive applies to the aquatic habitat of bivalve and gastropod molluscs only (includes oysters, mussels, cockles, scallops and clams). It does not include crustaceans such as lobsters, crabs and crayfish. **There are two areas of Shellfish Waters within, partially within or adjacent to the County: Drumcliff; and Sligo Bay.**

<sup>23</sup> Salmonid waters are designated and protected as under the European Communities (Quality of Salmonid Waters) Regulations 1988 (S.I. No. 293 of 1988). Designated Salmonid Waters are capable of supporting salmon (*Salmo salar*), trout (*Salmo trutta*), char (*Salvelinus*) and whitefish (*Coregonus*). **There are 3 sections of rivers within the County designated as a Salmonid Water under these regulations: Moy; Owengarve (Sligo); and Mullaghanoe.**

<sup>24</sup> The Flora (Protection) Order, 2015 (S.I. No. 356 of 2015) gives legal protection to 65 species of bryophytes in the Republic of Ireland (25 liverworts and 40 mosses). **There are 14 locations within County Sligo with FPOs, including: Knocknarea Glen (*Southbya tophacea*); Bunduff (*Petalophyllum ralfsii*); Yellow Strand, Raghly (*Didymodon acutus*); Fiddandarry (*Meesia triquetra*); and Annacoona (*Myurella julacea*).**

<sup>25</sup> Land cover is the observed physical cover, as seen from the ground or through remote sensing, including for example natural or planted vegetation, water and human constructions which cover the earth's surface.

<sup>26</sup> *Sligo County Wetlands Survey 2011* have identified 493 wetland areas in the County.

<sup>27</sup> Including the Tree Register of Ireland (TROI), which was set up in 1999 to compile a comprehensive database of remarkable trees in Ireland. The TROI identified 16 trees in Sligo that are considered environmental value to the County and that such trees should be protected from development where necessary.

Region 2020-2032 as a Regional Growth Centre. Sligo Town is in a strategic position where the Western Region meets the Border Region. It is a significant administrative, employment, commercial, health and education centre for the rural hinterlands. Regional Growth Centres have the capacity and future growth potential to accommodate above average growth in tandem with the requisite investment in employment creation, services, amenities and sustainable transport.

The new population provided for in the Draft Plan will interact with various environmental components. Potential interactions include:

- Recreational and development pressure on habitats and landscapes;
- Increase in demand for wastewater treatment at the municipal level;
- Increase in demand for water supply;
- Potential interactions in flood-sensitive areas; and
- Potential effects on water quality.

With regard to human health, impacts relevant to the SEA are those which arise as a result of interactions with environmental vectors (i.e. environmental components such as air, water or soil through which contaminants or pollutants, which have the potential to cause harm, can be transported so that they come into contact with human beings). Hazards or nuisances to human health can arise as a result of exposure to these vectors arising from incompatible adjacent landuses, for example.

### 3.4 Soil

The predominant soil types within the County generally comprise peats and gleys from glacial drift derived from a mix of limestone, sandstone shale and other rocks. The majority of County Sligo is covered by peat, surface water gleys, luvisols, brown podzolics and brown earths with small areas of groundwater gleys and rendzinas found in the north and south of the County. Areas of alluvium are identified along the main waterways.

Peat soils are often indicative of areas that are the most sensitive to development due to ecological sensitivities and impeded drainage issues. Active blanket bogs and active raised bogs are considered to be priority habitats, listed on Annex I of the EU Habitats Directive. Peatlands are found at many locations across the County and extensively in the western, south-western and north-western parts of the Plan area. The SEA will examine issues including the loss of soils/soil sealing, as a result of greenfield development, and interactions with biodiversity and carbon storage, such as those that can occur as a result of development in peatland areas.

Under the Irish Geological Heritage (IGH) Programme important sites that are capable of being conserved as Natural Heritage Areas (NHA) are being identified. Those not selected for NHA designation are being promoted as County Geological Sites (CGSs). All sites of geological heritage importance are currently classified as CGSs until such time that the most significant sites can be designated as geological NHAs. There are currently 25 (no.) CGSs identified across the County<sup>28</sup>.

Mapping and data from the Geological Survey of Ireland, including Previous Landslide Events Mapping and Landslide Susceptibility Mapping, will be considered by the SEA.

### 3.5 Water

#### 3.5.1 Status and Quality

The Water Framework Directive (WFD) requires that all Member States implement the necessary measures to prevent deterioration of the status of all waters - surface, ground, estuarine and coastal - and protect, enhance and restore all waters with the aim of achieving *good status*. All public bodies are required to coordinate their policies and operations so as to maintain the good status of water bodies that are currently unpolluted and improve polluted water bodies to *good status*.

<sup>28</sup> McAteer, C. & Parkes, M. 2004. The Geological Heritage of Sligo. An audit of County Geological Sites in Sligo. Geological Survey of Ireland ([www.gsi.ie](http://www.gsi.ie)).

Various catchments drain the County, including Sligo Bay, Drowse, Erne, Upper Shannon and Moy and Killala Bay. Lough Gill, Lough Arrow, Lough Talt, the lakes Gara, Easky and Templehouse, together with the rivers Owenmore, Unshin, Moy and Easky, are amongst the main water bodies in County Sligo.

The SEA will use information from the EPA regarding surface water status, including that contained within Integrated Water Quality Reports. The SEA will also include information on groundwater status. The WFD groundwater status (2013-2018) underlying County Sligo is generally identified as being of *good* status.

The status of rivers and streams (2013-2018) draining County Sligo ranges from *high* (sections of rivers and streams including: Unshin; Owenmore, Sligo; Duff; Owenbeg, Coolaney; Easky; Loughanaboll; Owenaher; Lenyvee; Eignagh; and Glenree) to *good* (sections of rivers and streams including: Duff; Drumcliff; Willsborough Stream; Killanummery; Ballysodare; Feorish, Ballyfarnon; Arigna, Roscommon; Unshin; Drumfin; Owenbeg, Coolaney; Killoran Lough Stream; Moy; Eignagh; Owenaher; Easky; Gowlan, Sligo; Brusna, North Mayo; Bellawaddy; Leaffony; Finned; Dunneill; Doonbeakin; and Dunmorán) to *moderate* (sections of rivers and streams including: Grange, Sligo; Unshin; Owenmore, Sligo; Cloneen, Sligo; Corsallagh Stream; Moy; Mad; Buncrowey; Doonflin; Lugdoon Stream; Mullaghnoe; and Black, Sligo) and *poor* (sections of rivers and streams including: Garavogue; Douglas, Sligo; Feorish, Ballyfarnon; Owenmore, Sligo; Tobercurry; Tubbercurry Stream; and Moy).

The status of lakes (2013-2018) in the County ranges from *good* (including lakes: Killsellagh; Talt; and Easky), to *moderate* (including lakes: Glencar; Gill; Arrow; and Gara), and *bad* (including Templehouse Lake).

The status of coastal waterbodies (2013-2018) in the County is *good* (including Sligo Bay and Killala Bay). And the status of transitional waterbodies (2013-2018) in the County is *moderate* (including: Garavogue Estuary; Ballysadare Estuary; and Moy Estuary). In addition, there are a number of *unassigned*<sup>29</sup> rivers, lakes, coastal and transitional waterbodies across County Sligo.

Pressures on waterbodies, such as forestry or domestic waste water treatment systems, that are failing to meet the WFD's overall objective of *good status* will be identified by the SEA and policy responses will be recommended as necessary. The SEA will also provide information on aquifer vulnerability, aquifer productivity and entries to the WFD's Registers of Protected Areas.

### 3.5.2 Flooding

Certain areas across the County are at risk of flooding from various sources including pluvial, fluvial coastal and groundwater, with various historic and predictive indicators of flood risk in the County. A Strategic Flood Risk Assessment (SFRA), as required by 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Circular PL 2/2014 (Department of Environment, Community and Local Government), is being undertaken alongside the preparation of the SEA and the preparation of the Draft Plan. The SFRA will focus on land use zoning provided for by the County Development Plan as well as County-wide flood risk management policy. The SFRA will consider available and emerging information on flood risk indicators, including the OPW's Flood Hazard and Risk Mapping and any flood defences and inter-County interactions.

## 3.6 Air and Climatic Factors

### 3.6.1 Air

The EPA's (2021) *Air Quality in Ireland 2020* identifies that:

- Air quality in Ireland is generally good however there are localised issues.

<sup>29</sup> There is a data gap relating to WFD surface water status data. Overall status is currently not assigned and the term "*unassigned status*" applies in respect of these waterbodies.

- Ireland was above the European Environment Agency reference level for polycyclic aromatic hydrocarbons (PAHs), a toxic chemical, at 4 monitoring sites due to the burning of solid fuel.
- Ireland was above World Health Organization (WHO) air quality guidelines for particulate matter (PM), sulphur dioxide (SO<sub>2</sub>) and ozone at 52 monitoring sites across the country.
- The travel restrictions imposed as a result of Covid-19 had a positive impact on air pollution in our urban areas with up to 50% reductions in traffic pollution.
- Levels of nitrogen dioxide (NO<sub>2</sub>) from transport emissions fell in 2020, however, if long-term changes are not made to modes or patterns of transport it will lead to future exceedances in the urban areas.

With regards to solutions, the report identifies that:

- To tackle the problem of particulate matter:
  - Move away from domestic burning of solid fuel (coal, wood, peat) towards cleaner ways of heating homes such as heat-pump technology.
  - Implement the Government's proposed nationwide smoky fuel ban in 2022 which will facilitate people to make clean air choices.
- To reduce the impact of NO<sub>2</sub>:
  - Implement the transport options (clean public transport and increasing the use of electric vehicles) as identified in the Government's Climate Action Plan.
  - Avoid reverting to pre-COVID traffic levels, maintain pedestrianisation of Ireland's urban areas and continue to improve cycling infrastructure.

The current air quality in County Sligo is identified by the EPA as being *good*<sup>30</sup>.

### 3.6.2 Climatic Factors

#### Requirements for Development Plans and Suggested Responses

Section 10 (2) of the Planning and Development Act 2000 (as amended) requires Development Plans to include various types of objectives, including those detailed Table 3.1 that relate to climate mitigation and adaptation. Table 3.1 also identifies suggested responses to these requirements.

**Table 3.1 Climate Mitigation and Adaption Requirements for Development Plans and Suggested Responses**

Requirement of under the Planning and Development Act 2000 (as amended) Section 10 (2) (n)	Suggested Development Plan Response, including:
(n) the promotion of sustainable settlement and transportation strategies in urban and rural areas including the promotion of measures to:	
(i) reduce energy demand in response to the likelihood of increases in energy and other costs due to long-term decline in non-renewable resources,	<ul style="list-style-type: none"> <li>• Reducing need to travel using population allocations – taking into account emissions from transport</li> <li>• Maximise adjacency between populations, public transport capacity and locations for employment, retail, services and amenities</li> </ul>
(ii) reduce anthropogenic greenhouse gas emissions, and	<ul style="list-style-type: none"> <li>• New compact growth policy for settlements</li> <li>• Improve permeability and reduce car dependency to do short distance journeys</li> <li>• Promote compact mixed-use settlements which will reduce the need for car-based commuting</li> <li>• Written Plan provisions, including for connectivity, permeability and public transport provision in existing and new settlements</li> </ul>
(iii) address the necessity of adaptation to climate change;	<ul style="list-style-type: none"> <li>• Population allocations taking into account water services and assimilative capacity</li> <li>• Land use zoning – taking into account flood risk</li> <li>• Written Plan provisions</li> </ul>
in particular, having regard to:	
location,	<ul style="list-style-type: none"> <li>• Population allocations – water services and assimilative capacity</li> <li>• Land use zoning – taking into account flood risk</li> <li>• Land use zoning – taking into account emissions from transport; and maximising connectivity and accessibilities to employment retail, services and amenities</li> <li>• Written Plan provisions</li> </ul>
layout and design of new development;	<ul style="list-style-type: none"> <li>• Written Plan provisions and maximising permeability and connectivity to facilities and amenities</li> </ul>

<sup>30</sup> 29/03/2022 (<http://www.epa.ie/air/quality/>)

Written Development Plan provisions to address climate mitigation and adaptation are expected to cover the topics of employment uses to serve residents, shared office spaces to serve existing and potential commuters, energy, sustainable mobility, flood risk management and drainage. The SEA will recommend climate action measures for integration into the Plan under headings including: buildings; agriculture, land management and forestry; transport; energy production; minerals; resource management; water management; infrastructure, including flood defences; wildlife and biodiversity; economy and tourism; and human health, risk and insurance.

## Climate Action Plan

The revised National Climate Action Plan 2021 provides a detailed plan for taking decisive action to achieve a 51% reduction in overall greenhouse gas emissions by 2030 and setting us on a path to reach net-zero emissions by no later than 2050, as committed to in the Programme for Government and set out in the Climate Act 2021. The Plan lists the actions needed to deliver on Ireland's climate targets and sets indicative ranges of emissions reductions for each sector of the economy. It will be updated annually, including in 2022, to ensure alignment with Ireland's legally binding economy-wide carbon budgets and sectoral ceilings.

The EPA 2021 publication *Ireland's Greenhouse Gas Emission Projections 2020-2040* provides an assessment of Ireland's total projected greenhouse gas emissions from 2020 to 2040, updated using the latest Inventory data for 2019. The report also includes an assessment of progress towards achieving its emission reduction targets for 2020 and 2030 as set out under the EU Effort Sharing Decision (ESD)<sup>31</sup> and Effort Sharing Regulation (ESR)<sup>32</sup>. Key findings identified as part of the report's package of documents are that:

- Implementation of "Additional Measures" (including those in the 2019 Climate Action Plan) is projected to save 58 Mt CO<sub>2</sub> eq over the period 2021-2030 compared to the "With Existing Measures". This represents a reduction of 1.8% per annum in emissions over the period.
- Ireland's emissions covered by the 2013-2020 EU Effort Sharing Decision target are estimated to have been 7% below 2005 levels in 2020. Ireland is estimated to have cumulatively exceeded its compliance obligations by 12.2 Mt CO<sub>2</sub> eq over the 2013-2020 period, and will need to use credits and/or purchase surplus annual emission allocations from other member states to achieve compliance.
- These Projections indicate that Ireland can meet its non-ETS EU targets over the period 2021 to 2030 assuming full implementation of the 2019 Climate Action Plan and the use of the flexibilities available. Future, more ambitious targets as presented in the European Climate Law and Ireland's Climate Bill will require many (as yet unidentified) additional measures.
- Increased renewable electricity generation, including a projected 5GW of offshore wind generation, is expected to contribute to a 70% contribution of renewable energy in electricity generation by 2030. Energy industries emissions are projected to decrease by one third by 2030 compared to the most recent figures in 2019.
- Agriculture emissions are projected to decline by 1.2% per annum over the 2021- 2030 period, provided the 16.5 Mt CO<sub>2</sub> eq savings from the agriculture sector identified in the 2019 Climate Action Plan are realised. Increase use of protected urea fertilisers and low emission slurry spreading, along with other measures targeting methane emissions from animals, will be required.
- The impact of COVID is projected to have led to a 14% reduction in transport emissions in 2020 compared to 2019. The measures in the 2019 Climate Action Plan include 936,000 electric vehicles on the road by 2030 and are projected to reduce emissions to 25.5% below 2019 levels by 2030. It will be necessary to avoid a post-COVID surge in emissions to achieve that reduction.
- The projected impact of COVID in the residential sector in 2020 is an increase of almost 9% in emissions compared to 2019, driven by increased working from home. This highlights the need for our houses to become far more efficient, particularly in the context of broader home working. Implementing the 2019 Climate Action Plan measure for the installation of over 600,000 heat-pumps by 2030 as well as retrofitting 500,000 homes to a B2 equivalent BER will help achieve this.
- A strong impact from COVID is seen in the emissions projections for 2020 and 2021. A decrease of transport emissions and increase in residential emissions are the most obvious effects projected. Agriculture emissions are projected to have been little affected and energy emissions decreases are not primarily COVID related. As the economy exits from COVID restrictions, a "green recovery" where investment is targeted at measures which reduce or avoid greenhouse gas emissions, can result in better outcomes for society and the environment.
- The scale and pace of the changes needed to achieve the targets set out in the 2019 Climate Action Plan are significant, but the extent of change required to meet the Climate Bill and European Climate Law targets is unprecedented. Further ambitious measures in key sectors such as agriculture, transport and power generation will need to be identified, planned and implemented as soon as possible.

<sup>31</sup> Decision No. 406/2009/EC of 23 April 2009 on the effort of Member States to reduce their greenhouse gas emissions to meet the Community's greenhouse gas emission reduction commitments up to 2020.

<sup>32</sup> Regulation (EU) 2018/842 on binding annual greenhouse gas emission reductions by Member States from 2021 to 2030 contributing to climate action to meet commitments under the Paris Agreement.

In 2020 the sectors with the largest contribution of emissions were agriculture (37.4%), transport (18.4%) and energy industries (14.8%). This projection includes the impact of COVID on the 2020 emissions which due to national lockdowns saw transport emissions decline, but agriculture emissions largely unaffected. The main source of emissions from the transport sector was road transport, accounting for approximately 95% of transport emissions in 2019. The contribution by the transport sector to Ireland's greenhouse gas emissions highlights the need for a concentrated effort to reduce transport emissions.

Ireland's National Policy position is to reduce CO<sub>2</sub> emissions in 2050 by 80% on 1990 levels across the Energy Generation, Built Environment and Transport sectors, with a goal of Climate neutrality in the Agriculture and Land-Use sector. The emissions for all of these sectors are rising, making achievement of long-term goals more difficult.

## **Climate Mitigation**

Climate mitigation describes action to reduce the likelihood of climate change occurring or reduce the impact if it does occur. This can include reducing the causes of climate change (e.g. emissions of greenhouse gases) as well as reducing future risks associated with climate change.

Key issues relating to the preparation of Development Plans in the context of climate mitigation include those relating to greenhouse gas emissions arising from transport and renewable energy development. Development Plans are primarily land use plans. Land use plans and transport are closely linked. By improving sustainable mobility through land use planning, Development Plans have the potential to reduce existing levels of greenhouse gas emissions and limit increases in future emissions. Other beneficial effects arising from climate mitigation include contributions towards reductions in energy consumption, increases in alternative energy usage, maintenance/improvement of air quality and reductions/limits in increase of noise emissions. With regard to renewable energy development, it is expected that the Development Plan will include a Renewable Energy Strategy that will contribute towards the proper planning and sustainable development of Renewable Energy within the County. The use of alternative fuels, including electricity, forms a significant part of government policy to reduce emissions, including from transport. Greater use of alternative fuels, including renewable energy, has the potential to further contribute towards energy security.

The SEA will evaluate the likely significant environmental effects of Development Plan provisions and the reasonable alternatives selected. This assessment will include an analysis of impact of land use zoning on carbon reduction targets.

The Climate Change Advisory Council's Annual Review 2021 identified that when considering national policy goals to 2050, Ireland is presently significantly off-track from paths that deliver long-term transition towards climate neutrality on that timescale. The Council also noted that transport trends are not consistent with a sustainable low-carbon path, making emissions reductions more difficult, while also driving congestion and a host of sustainability problems and costs. It is necessary to accelerate electrification while putting an urgent priority on long-term integrated spatial and mobility planning in Ireland, if a transformational sustainable path is to be delivered.

## **Climate Adaptation**

Climate adaptation is a change in natural or human systems in response to the impacts of climate change. These changes moderate harm or exploit beneficial opportunities and can be in response to actual or expected impacts.

The National Adaptation Framework Department of Communications, Climate Action and Environment, 2018), sets out the national strategy to reduce the vulnerability of the country to the negative effects of climate change and to avail of positive impacts. The National Adaptation Framework outlines a whole of government and society approach to climate adaptation. Under the Framework, a number of Government Departments will be required to prepare sectoral adaptation plans in relation to a priority area that they are responsible for. The statutory Climate Change Adaptation Plan for the Transport Sector was prepared under the Climate Action and Low Carbon Development Act (2015) and the National Adaptation Framework

(2018) and published by the Department of Transport in 2019. The plan sets out the national strategy to reduce Ireland's vulnerability to the negative effects of climate change and to avail of any positive impacts, with an objective to help develop resilience within the sector in order to safeguard transport infrastructure from future climate impacts.

One of the key issues relating to the preparation of Development Plans in the context of climate adaptation is flooding. Strategic Flood Risk Assessment (see Section 3.5.2) facilitates the appropriate zoning of areas that are at elevated risk of flooding and the integration of flood risk management provisions into Development Plans. Another issue related to flooding and climate adaptation that will be considered is coastal erosion (see also Section 3.7).

The Sligo County Council Climate Change Adaptation Strategy 2019-2024 features a range of actions across sectors including seafood, agriculture, forestry, biodiversity, built and archaeological heritage, transport infrastructure, electricity and gas networks, communication networks, flood risk management, water quality, water services infrastructure and health. The Strategy seeks to:

- Ensure a proper comprehension of the key risks and vulnerabilities of climate change;
- Bring forward the implementation of climate resilient actions in a planned and proactive manner; and
- Ensure that climate adaptation considerations are mainstreamed into all plans and policies and integrated into all operations and functions of the local authority.

## 3.7 Material Assets

Other material assets, in addition to those detailed below, that will be covered by the SEA include archaeological and architectural heritage (see Section 3.8) natural resources of economic value, such as water, air and soil<sup>33</sup> (see Sections 3.4, 3.5 and 3.6.1) and fisheries.

### 3.7.1 Waste Water

Waste water demand and capacity information at settlements that will be considered by the SEA, where available, includes<sup>34</sup>:

- Population served;
- Loading;
- Capacity;
- Level of treatment;
- Spare capacity or shortfall;
- Compliance with urban waste water treatment Directive;
- Population provided for by the Plan by 2029 that will be served;
- Predicted 2029 loading;
- Planned 2029 capacity;
- Predicted 2029 spare capacity or shortfall; and
- Waste water infrastructure investment needs.

The EPA produces annual reports on the treatment of urban wastewater from cities, towns and urban communities. The latest EPA 2021 report '*Urban Waste Water Treatment in 2020*' identifies the priority areas where resources must be targeted, in order to protect the environment from the harmful effects of wastewater, and deliver environmental improvements where they are most needed. Based on the EPA's assessment of monitoring information provided by Irish Water and the enforcement activities carried out by the EPA, this report identifies urban areas with the most important environmental issues that must be addressed. Collooney and Grange are listed as two of the 97 priority areas in Ireland, where improvements are required to resolve urgent environmental issues.

### 3.7.2 Drinking Water

Drinking water demand and capacity information that will be considered by the SEA, where available, includes:

<sup>33</sup> Soil and geological resources will be considered under this topic including with respect to mineral locations and aggregate potential.

<sup>34</sup> Detailed water services information will inform the preparation of the SEA Environmental Report.

- Population served;
- Demand;
- Supply capacity;
- Spare capacity or shortfall;
- Population provided for by the Plan by 2029 that will be served;
- Predicted 2029 demand;
- Planned 2029 supply capacity;
- Predicted 2029 spare capacity or shortfall; and
- Water supply infrastructure investment needs.

Drinking water must be clean and wholesome. That means it must meet the relevant water quality standards and must not contain any other substance or micro-organism in concentrations or numbers that constitute a potential danger to human health.

Compliance with the drinking water requirements is determined by comparing the results of analyses submitted by water suppliers to the standard for 48 parameters specified in the European Communities (Drinking Water) Regulations (No. 2), 2007. To ensure that these standards are met, each water supply must be monitored on a regular basis.

Under Section 58 of the EPA Act 1992 the EPA is required to collect and verify monitoring results for all water supplies in Ireland covered by the European Communities (Drinking Water) Regulations, 2000. The EPA publishes their results in annual reports which are supported by Remedial Action Lists (RALs). These lists identify water supplies that are not in compliance with the Drinking Water Regulations. There are currently no Sligo water supplies identified on the most recent available EPA Remedial Action List (Q4 of 2021).

Water quality and management of nutrients from sources such as agriculture, municipal wastewater treatment plants and on-site wastewater treatment systems will be also considered by the SEA.

### **3.7.3 Transport**

County Sligo occupies a strategic location on the National Road network with the N4, N15, N16, N17 and N59 traversing parts of the County. The national road network in the County provides an essential means of access from the County to Dublin and other regional centres. There are three railway stations in Sligo that are served by the train line to Dublin – Sligo Mac Diarmada Station (Sligo town), Collooney Station and Ballymote Station. Bus Éireann and a number of other private operators provide bus services into and out of the County.

### **3.7.4 Waste Management**

Waste management in County Sligo is guided by the Connacht Ulster Region Waste Management Plan 2015-2021. The Connacht Ulster Region comprises: Leitrim County Council; Mayo County Council; Galway County Council; Galway City Council; Roscommon County Council; Sligo County Council; Donegal County Council; Cavan County Council; and Monaghan County Council.

### **3.7.5 Public Assets and Infrastructure**

Public assets and infrastructure that have the potential to be impacted upon by the Plan, if unmitigated, include; settlements; resources such as public open spaces, parks and recreational areas; public buildings and services; transport and utility infrastructure (electricity, gas, telecommunications, water supply, waste water infrastructure etc.); forestry; and natural resources that are covered under other topics such as water and soil.

### **3.7.6 Land and Coastline**

The Plan has the potential to assist with the reuse and regeneration of brownfield sites thereby contributing towards sustainable mobility and reducing the need to develop greenfield lands and associated adverse environmental effects. Brownfield lands are generally located within urban/suburban areas. The management of the County's coastline and coastal erosion are also topics with relevance to various environmental components.

### 3.7.7 Renewable Energy Potential

Available information on renewable energy potential within and adjacent to the County – and any associated Plan provisions – will be considered by the SEA.

## 3.8 Cultural Heritage

### 3.8.1 Archaeological Heritage

Archaeological heritage is protected under various legislation including the National Monuments Acts (1930-2004), Natural Cultural Institutions Act 1997 and the Planning Acts. The SEA Environmental Report will include information on the archaeological heritage of County Sligo, including that relating to designations such as entries to the Record of Monuments and Places.

To date there has been over 6,500 known Recorded Monuments identified in County Sligo<sup>35</sup> including many monuments in State Care (such as: Rathmore holy well; Knockmullin burial ground; Cabragh wedge tomb; and Rathbarran mass rock). Each of the Recorded Monuments is encircled by a Zone of Archaeological Notification. Clusters of archaeological heritage are concentrated within and surrounding towns and villages and in lowland rural areas.

Sligo's archaeological heritage includes monuments from the Mesolithic Period (7,000 BC) to the end of the Medieval Period (1,700 AD). These monuments range from megalithic tombs, churches, castles, linear earthwork and ringforts and are found throughout the County. There are also approximately 1,200 industrial heritage sites across the County as identified in the Industrial Archaeology Survey of County Sligo (2005).

Sligo has a number of significant archaeological and historical landscapes, the most notable being the Cuil Irra Peninsula (which includes Knocknarea, Carrowmore and Carns Hill), Carrowkeel and Inishmurray. The cluster of megalithic tombs at Carrowmore represents one of the four major passage tomb cemeteries in Ireland and is the largest such cemetery in the country. Others include Carrowkeel, also in County Sligo, as well as Newgrange and Lough Crew in County Meath. The archaeological landscape of the Cuil Irra (Knocknarea) peninsula dates from around 4,000 BC, which formed an important ritual centre in the Neolithic period. Queens Maeve's Cairn on Knocknarea is an iconic landscape feature of County Sligo and forms part of Sligo's Neolithic passage tomb tradition.

Wrecks over 100 years old and archaeological objects underwater, irrespective of their age or location, are protected under Section 3 of the National Monuments (Amendment) Act 1987. The coastal and marine areas of the County provide potential for underwater archaeology, including in the intertidal areas. Sites of particular archaeological significance in County Sligo include the wrecks of three ships considered to be of the Spanish Armada (c.1588 A.D.) at Streedagh, County Sligo.<sup>36</sup> Wrecks that are less than 100 years old and the potential location of wrecks or archaeological objects may also be protected under Section 3 of the 1987 (Amendment) Act by the placement of an underwater heritage order if the wreck, area or object is considered to be of sufficient historical, archaeological or artistic importance to merit such protection<sup>37</sup>.

The SEA Environmental Report will include information on the archaeological heritage of County Sligo, including that relating to designations such as entries to the Record of Monuments and Places.

### 3.8.2 Architectural Heritage

The SEA Environmental Report will include information on the architectural heritage of County Sligo, including that relating to designations such as the Record of Protected Structures.

The Record of Protected Structures included in the current County Development Plans are legislated for under Section 12 and Section 51 of the Planning and Development Act 2000 (as amended). Protected

<sup>35</sup> Sligo CDP 2017-2023 (as varied)

<sup>36</sup> National Monuments Service: Wreck Viewer ([arcgis.com](http://arcgis.com))

<sup>37</sup> DCHG, National Monuments Service (<https://www.archaeology.ie/underwater-archaeology>).

Structures are defined as structures, or parts of structures that are of special interest from an architectural, historical, archaeological, artistic, cultural, scientific, social or technical point of view. There are currently over 700 Protected Structures designated in County Sligo<sup>38</sup>, including churches, houses, bridges, castles, lodges and artisan dwellings. Notable protected structures in County Sligo include: St. Crumnath's Cathedral; Pollachurry Pier; Coastguard Station; Oyster Island Lighthouse; Sligo Gaol; and Markree Demesne.

An Architectural Conservation Area (ACA) is a place, area, group of structures or townscape, which is of special architectural, historical, archaeological, artistic, cultural, scientific, social or technical interest or contributes to the appreciation of a Protected Structure. An ACA may or may not include Protected Structures. In an ACA, protection is placed on the external appearance of such areas or structures. There are currently seven ACAs designated in County Sligo: Ballymote ACA; Market Cross ACA; Courthouse ACA; Cathedral ACA; Wolfe Tones ACA; and O'Connell Street ACA.<sup>39</sup>

### 3.9 Landscape

County Sligo is characterised by a variety of mainly rural landscapes, including rough pasture predominantly in the mountains, hills, and peat bogs. On the east, the boundary with County Leitrim runs southward through the coastal lowland to the limestone Dartry Mountains, including Benbulbin Mountain (noted as one of Ireland's most distinctive natural landmarks). The County boundary crosses Glencar and an area of plateau to Lough Gill with the island of Innisfree. West of the Collooney Gap, the ridge forms the Ox Mountains and a peat moorland and to the north an area of continuously farmed lowland, from the mouth of the River Moy to the Leitrim border. The coastal areas of the County include Sligo Bay with three long estuaries, leading to the towns of Drumcliff, Sligo, and Ballysadare, which receive the waters of the Rivers Drumcliff, Garravogue, and Owenmore.

A landscape characterisation and appraisal study for Sligo County Council was completed in 1996. This resulted in a map that was the basis for the Landscape Characterisation Map, which classified the areas in the County according to its visual sensitivity and capacity to absorb new development without compromising the scenic character of certain areas. It designates the following: Normal Rural Landscapes; Sensitive Rural Landscapes; Visually Vulnerable Areas; and Scenic Routes.

Landscape designations will be taken into account by the assessment. These include:

- Existing designations identified by Sligo County Development Plan 2017-2023 (as varied), such as heritage landscapes, which are highly sensitive to development and which are of exceptional value and of international importance e.g. the Cuil Irra Peninsula, Carrowkeel and Inishmurray; and
- Emerging designations; a new Landscape Character Assessment for County Sligo will be carried out in order to inform the new Plan and it is expected that the existing landscape designations will be revised.

---

<sup>38</sup> Sligo CDP 2017-2023 (as varied)

<sup>39</sup> Sligo CDP 2017-2023 (as varied)

## Section 4 Other Issues Relevant to the Scope of the SEA

### 4.1 Environmental Issues and Components

Key environmental issues to be considered comprise relating to the baseline for each of the environmental components identified in Section 3 of this report. These issues have been informed by written scoping submissions made by the environmental authorities.

In compliance with the legislation, the following environmental components, and any relevant interrelationships<sup>40</sup>, will be considered by the SEA:

- Biodiversity and flora and fauna;
- Population and human health;
- Soil;
- Water;
- Air and climatic factors;
- Material assets;
- Cultural heritage; and
- Landscape.

These topics will be addressed as relevant in the description (mapped and textual) of the environmental baseline, in Strategic Environmental Objectives, indicators and targets and in the identification of likely significant environmental effects, if any, and in the updating of existing Plan provisions (arising from superseded legislation, guidelines, etc.) and the inclusion of new Plan provisions for environmental protection and sustainable development.

### 4.2 Guidelines and Legislation

The SEA, AA and SFRA will ensure compliance with environmental and planning legislation, including:

- The SEA Directive and the Habitats and Birds Directives;
- The Planning and Development (Strategic Environmental Assessment) Regulations 2004 (S.I. No. 436 of 2004), as amended by the Planning and Development (Strategic Environmental Assessment) (Amendment) Regulations 2011 (S.I. No. 201 of 2011);
- The Planning and Development Act 2000 (as amended); and
- The European Communities (Birds and Natural Habitats) Regulations 2011 (as amended).

In addition to complying with the legislation, the processes will be undertaken taking into account the following guidance:

- *Strategic Environmental Assessment Guidelines for Regional Assemblies and Planning Authorities* Department of Housing, Local Government and Heritage, 2022.
- *Appropriate Assessment of Plans and Projects in Ireland. Guidance for Planning Authorities.* Department of the Environment, Heritage and Local Government, 2009.
- *Assessment of plans and projects significantly affecting Natura 2000 sites: Methodological guidance on the provisions of Article 6(3) and (4) of the Habitats Directive 92/43/EEC*, European Commission Environment DG, 2000.
- *Developing and Assessing Alternatives in Strategic Environmental Assessment*, Environment Protection Agency, 2015. *EPA GISEA Manual: Current Practice and Potential on the Application of Geographical Information Systems as a Support Tool in Strategic Environmental Assessment of Irish Land Use Plans*, Environment Protection Agency, 2009.
- *Guidance on Integrating Climate Change and Biodiversity into Strategic Environmental Assessment*, European Commission, 2013.
- *Integrated Biodiversity Impact Assessment – Streamlining AA, SEA and EIA Processes: Practitioner’s Manual*, Environment Protection Agency, 2013.
- *Integrating Climate Change into Strategic Environmental Assessment in Ireland*. Environmental Protection Agency, 2015.
- *Managing Natura 2000 sites: The Provisions of Article 6 of the Habitats Directive 92/43/EEC*: European Commission, 2000.
- *The Planning System and Flood Risk Management Guidelines for Planning Authorities*. Department of the Environment, Heritage and Local Government and Office of Public Works, 2009.

<sup>40</sup> In addition to being identified in relevant sections of the SEA Environmental Report as they arise, interrelationships between environmental components will be identified.

- Relevant Official Government Circulars.
- Relevant European Court of Justice Judgements.

### **4.3 Relationship with other plans and programmes**

The Plan is nested in a hierarchy of plans, programmes, etc. that relate to various sectors. The SEA Environmental Report will provide details on the relationship between the Plan and other plans and programmes (including transboundary plans and programmes in force in Northern Ireland). The Plan must comply with relevant higher-level strategic actions and may, in turn, guide lower level strategic actions. The SEA, AA and SFRA will take account of the Council's obligation to comply with all environmental legislation and align with and cumulatively contribute towards – in combination with other users and bodies – the achievement of the objectives of the regulatory framework for environmental protection and management.

In considering the relationship with legislation and other plans and programmes it is important to note that the Plan will be implemented within an area that has existing plans and programmes for a range of sectors (e.g. land use, transport, energy and water management) at a range of levels (e.g. national, river basin district, regional, county and local) that are subject to SEA and AA.

The findings of the environmental assessments of higher and lower tier plans (e.g. those of the Regional Spatial and Economic Strategy for the Northern and Western Region, adjacent County Development Plans and Local Area Plans) will be taken into account by the SEA for the County Plan.

### **4.4 Consideration of Potential Significant Environmental Effects**

As the Draft Plan emerges the SEA will identify, describe and mitigate likely significant environmental effects of implementation.

Plan measures providing for new development and continuance and intensification of use would be likely to result in potentially significant adverse effects, if unmitigated, while other Plan measures – including those that will be integrated into the Plan through the SEA/AA/SFRA processes – would be likely to contribute towards environmental protection and management and sustainable development.

The SEA will consider the full range of likely significant environmental effects<sup>41</sup>, including effects occurring at construction as well as operational stages.

### **4.5 Appropriate Assessment and Strategic Flood Risk Assessment**

Screening for Appropriate Assessment (AA), and subsequent stages of AA, as relevant, and Strategic Flood Risk Assessment (SFRA) are being undertaken alongside the SEA and the preparation and adoption of the Draft Plan (see Sections 1.3.2 and 1.3.3). The preparation of the Draft Plan, SEA, AA Screening/AA and SFRA will take place concurrently and the findings of the AA Screening/AA and SFRA will inform both the SEA and the Draft Plan.

---

<sup>41</sup> These effects include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects.

## 4.6 Alternatives

The SEA will examine different reasonable alternatives taking into account the objectives and the geographical scope of the plan. Headings under which alternatives will be considered may include:

- Positioning under the settlement hierarchy;
- Population allocations;
- Consideration of policy for pressure areas/rural areas under strong urban influence;
- Densities; and
- Land use zoning.

The SEA will seek to ensure that the selection of preferred alternatives by the Council is informed by environmental considerations including:

- Drinking water supply capacity;
- Waste water treatment capacity;
- Capacity of river to assimilate treated water; and
- Sustainable mobility factors e.g. public transport capacity availability, existing services availability (community, sport, retail etc.) and proximity to jobs.

## 4.7 Mitigation

Measures to contribute towards environmental protection and sustainable development will be recommended by the SEA for integration into the Draft Plan where necessary.

Mitigation measures will address all types of significant adverse environmental effects, including those arising from cumulative effects. Mitigation measures will take into account any suggestions in the submissions from environmental authorities.

## 4.8 Monitoring

The SEA will include information on the nature and frequency of monitoring to be carried out and organisations responsible for carrying out the monitoring. Guidance from the EPA will be taken into account in this regard.

## **Section 5 What happens next?**

Taking into account the scope detailed in this final SEA Scoping Report, environmental impacts will be predicted, evaluated and mitigated.

The findings of the assessment will be presented in an SEA Environmental Report that will accompany the Draft Plan on public display as part of the required statutory public consultation. The findings of both the AA and SFRA will be integrated into the SEA Environmental Report. AA and SFRA documents will also accompany the Draft Plan on public display.