






Donegal County Council  
**Lifford Commons**  
Planning Statement


Ref. 064-PS-01

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# 1 Introduction & Background

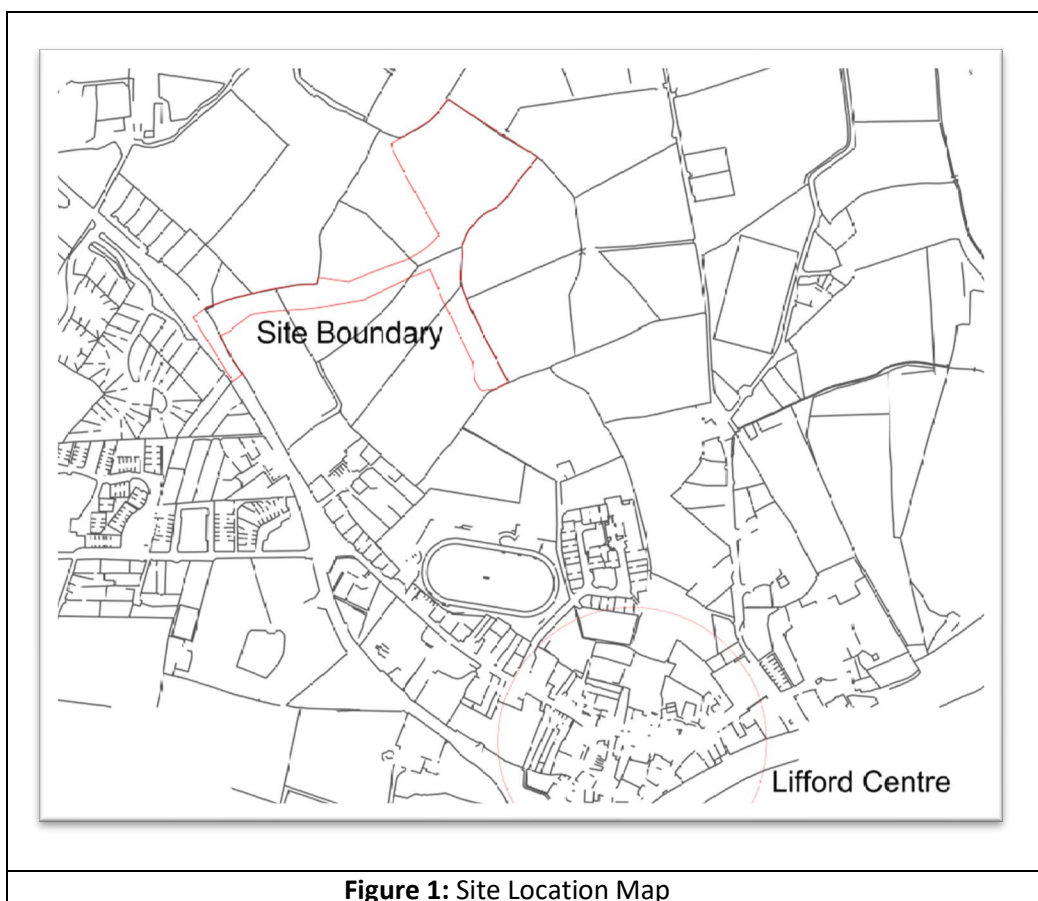
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## 1.1 Introduction

This Planning Statement has been prepared by Carlin Planning Limited on behalf of Donegal County Council (DCC), for proposed development at The Common, Lifford, Co. Donegal in the Stranorlar Municipal District (Figure 1). This proposed development includes roads and water infrastructure as well as a recreational facility. Further detail is provided at Section 2 below.

This enabling infrastructure is an important catalyst for the future development of a wider opportunity site as zoned by the Donegal County Development Plan.

The purpose of this report is to set out the information to assist An Bord Pleanála in the determination of this planning application under Section 177AE of the Planning and Development Act 2000.



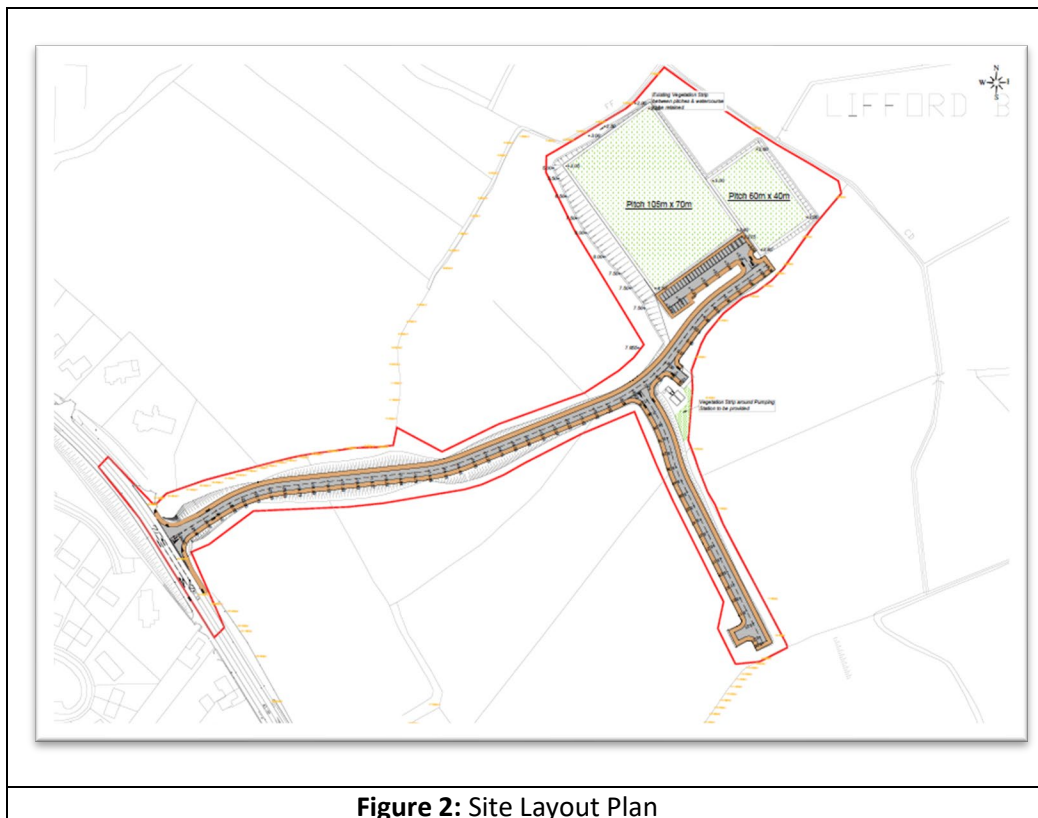
## 2 Nature and Extent of the Proposed Development

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The proposed development comprises the following:

1. Proposed recreational facility to include two sports pitches (one at 7350sqm one at 2400sqm) with associated floodlighting and car parking.
2. Enabling infrastructure works to include a wastewater pumping station and 720m of access roadway. The roads infrastructure includes the provision of roadway, footpaths, cycleways, associated street lighting, storm drainage and a proposed new access onto the N14 National Primary Road, including the provision of a right-hand turning lane.

The layout of the proposed development is shown on Figure 2 below. All plans relating to this scheme have been set out in Table 1 below and accompany the planning application.



**Table 1:** Schedule of Drawings

Drawings	Drawing Number
Site Location Map	LIF-MCA-ST1-00-DR-C-1000-Site Location Plan-S2-P3
Existing Site Plan	LIF-MCA-ST1-00-DR-C-1020-Existing Site Layout & Levels-S2-P1
Site Plan/Site layout	LIF-MCA-ST1-00-DR-C-1003-Proposed Site Layout (Overview)-S2-P9
	LIF-MCA-ST1-00-DR-C-1004-Proposed Right Hand Turn-S2-P7
	LIF-MCA-ST1-00-DR-C-1010-Proposed Site Layout-S2-P1 Scaled Sheet 1 of 2
	LIF-MCA-ST1-00-DR-C-1011-Proposed Site Layout-S2-P1 Scaled Sheet 2 of 2
	LIF-MCA-ST1-00-DR-C-1100-Proposed Site Levels (Overview)-S2-P3
Plans, Elevations & Sections	LIF-MCA-ST1-00-DR-C-1110-Proposed Road Longitudinal Sections Plan-S2-P3
	LIF-MCA-ST1-00-DR-C-1111-Proposed Road Longitudinal Sections-S2-P1
	LIF-MCA-ST1-00-DR-C-1112-Proposed Road Longitudinal Sections-S2-P1
	LIF-MCA-ST1-00-DR-C-1115-Proposed Site Cross Sections - Location Plan-S2-P3
	LIF-MCA-ST1-00-DR-C-1116-Proposed Site Cross Sections-S2-P1
Details (lighting / fencing / Drainage etc)	LIF-MCA-ST1-00-DR-C-1120 Proposed Lighting (Overview)-S2-P1
	LIF-MCA-ST1-00-DR-C-1500-Proposed Fencing (Overview)-S2-P1
	LIF-MCA-ST1-00-DR-C-2000 -Proposed Drainage Overview-S2-P3
	LIF-MCA-ST1-00-DR-C-3001-Construction Details-Pavement Buildups-S2-P1
	LIF-MCA-ST1-00-DR-C-3100-Foul Pumping Station - Construction Details-S2-P1
	LIF-MCA-ST1-00-DR-C-3101-Foul Pumping Station -Sections-S2-P1
	BE070 - E - 1 180522 - New Road Lighting Layout Illuminance Level Plot
	BE070 - E - 2 180522 - New Access Road and Car Park Lighting layout (1 of 2)
	BE070 - E - 3 180522 - New Access Road and Car Park Lighting layout (2 of 1)
	BE070 - E - 4 180522 - Sports Pitch Floodlighting Illuminance Plot
	BE070 - E - 5 180522 - Large Sports Pitch Floodlighting Details

	BE070 - E - 6 180522 - Small Sport Pitch Floodlighting Details
	BE070 - E - 7 180522 - Proposals and Details in relation to a new ESB Kiosk for the Waste Water Pumping Station and Road Lighting
<b>Other Drawings</b>	
Opportunity Site Masterplan	LIF-MCA-ST1-00-DR-C-1002-Opportunity Site Masterplan - S2-P5

**Table 2: Reports / Appendices**

	<b>Report</b>	<b>Consultant</b>
Appendix 1	Natura Impact Statement (January - May 2022)	Blackstaff Ecology
Appendix 2	Preliminary Ecological Assessment Report (October 2021 & May 2022)	Blackstaff Ecology
Appendix 3	Archaeological Assessment (February 2022)	John Purcell Archaeological Consultancy
Appendix 4	Flood Risk Assessment (May 2022)	McCloy Consulting
Appendix 5	Outline CEMP (May 2022)	Carlin Planning
Appendix 6	Generic Quantitative Risk Assessment (GQRA) (May 2022)	Tetra Tech
Appendix 7	Outline Invasive Non-Native Species Management Plan (May 2022)	Delta Simons
Appendix 8	EIA Screening (February 2022)	Carlin Planning
Appendix 9	Noise Impact Assessment (March 2022)	Layde Consulting
Appendix 10	Lighting Impact Statement (May 2022)	McAdam Design
Appendix 11	TII Design Report (April 2022)	McAdam Design
Appendix 12	Recreational Facility & Spine Road Traffic Statement (April 2022)	Hoy Dorman
Appendix 13	Drainage Strategy (May 2022)	McAdam Design

## 2.1 Site Description and Location

The site is c. 1.7ha in area and currently under the ownership of Donegal County Council is currently used in agricultural use.

The site is located with the Lifford Settlement Framework as defined by the Donegal County Development Plan 2018-2024 and accessed from the N14 National Road (see Figure 03).



**Figure 3:** Aerial View of Lifford

## Background to the project

The County Development Plan has zoned the site as a development opportunity (see section 3.3. of this report) and requires that a masterplan for the wider site. The provision of the proposed recreation facilities and enabling infrastructure will ensure an attractive leisure, sporting and cultural amenity for the local community. It will also provide enabling infrastructure to assist with the future development of the opportunity site.

## 3 Planning Policy

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### 3.1 National Policy Context

#### 3.1.1 Project Ireland 2040: National Planning Framework (NPF)

Project Ireland 2040 is the government's long-term overarching strategy to make Ireland a better country for all and to build a more resilient and sustainable future. The National Planning Framework and the National Development Plan 2021-2030 combine to form Project Ireland 2040. The NPF sets the vision and strategy for the development of our country to 2040 and the NDP provides the enabling investment to implement that strategy. The NPF's sets the context for sustainable regional development through '10



National Strategic Outcomes (NSO's) and was adopted 16 February 2018. The national strategic outcomes and strategic investment priorities of Project Ireland 2040 include:

- Compact Growth;
- Sustainable Mobility;
- Enhanced Amenity and Heritage; and
- Sustainable Management of Water, Waste and other Environmental Resources.

## **3.2 Regional Policy Context**

### **3.2.1 The Border Regional Authority: Regional Planning Guidelines (2010/2022)**

The Regional Planning Guidelines set out strategic goals to achieve its vision of:

*By 2022, the Border Region will be a competitive area recognised as, and prospering from, its unique interface between two economies, where economic success will benefit all, through the implementation of the balance development model, which will provide an outstanding natural environment, innovative people, which in themselves, will be our most valuable assets.*

The guidelines set out 9 strategic goals for the region which include:

- To protect and enhance the quality of the natural environment and built heritage of the Region; and
- To co-ordinate a regional approach to the key environmental challenges facing the Region.

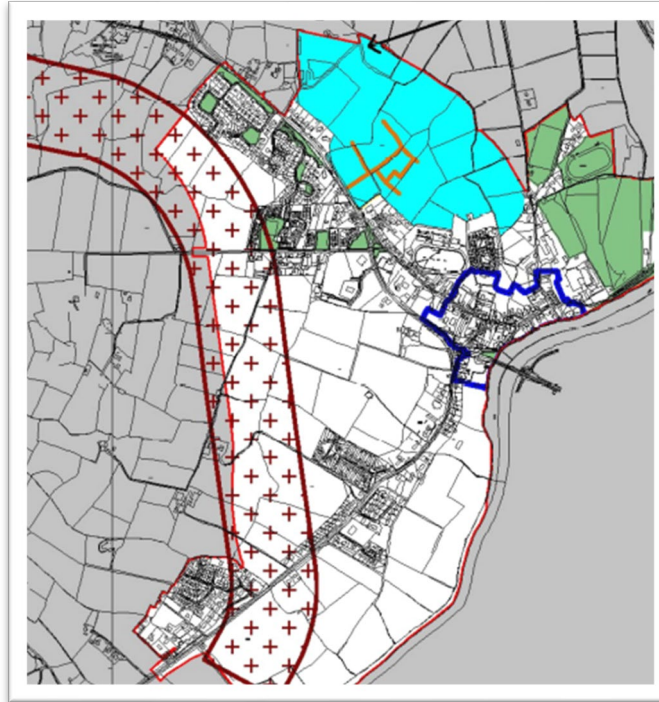
## **3.3 Local Policy Context**

### **3.3.1 Donegal County Development Plan 2018-2024**

The Donegal County Development Plan (2018-2024) defines Lifford as a Layer 2B Strategic Town due to proximity to Northern Ireland and associated cross border context.

The application site is part of a wider 'Opportunity Site' in the County Development Plan 2018-2024 (shaded blue on Figure 4). Plan Map 15.17 states:

*"The Opportunity Site has potential for a mixed-use development including proposals of an economic and employment generating nature. A masterplan for the overall broad layout of land use types within the site shall be required and all other objectives and policies of this plan shall apply".*



**Figure 4:** Extract from County Development Plan 2018-2024

The County Development Plan advises that opportunity sites are zoned ‘to provide for specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area whilst recognising features of importance that are specific to the site’.

It sets out detailed objectives regarding Community, Cultural and the Gaeltacht, including objectives CCG-O-5 and CCG-O-10 outlined below.

*CCG-O-5: To preserve, improve and extend amenities and recreational amenities of the county including:*

- Maintaining and enhancing our existing playgrounds, parks, and recreational spaces and providing new recreational amenities at sustainable locations.*
- Improving the urban environment of our Towns and Villages including through the Council’s town and village renewal programme.*

*CCG-O-10: To utilise funding generated by financial contributions levied under Section 48 and 49 and other provision of the Planning Acts to provide community infrastructure and such as open space and recreational facilities.*

Objective T-O-13 relates to infrastructure and supports “the development of new walkways, walking routes, trails greenways and cycleways that maximise the potential for local, regional and all-island walking and cycling networks.”

## 4 Planning History

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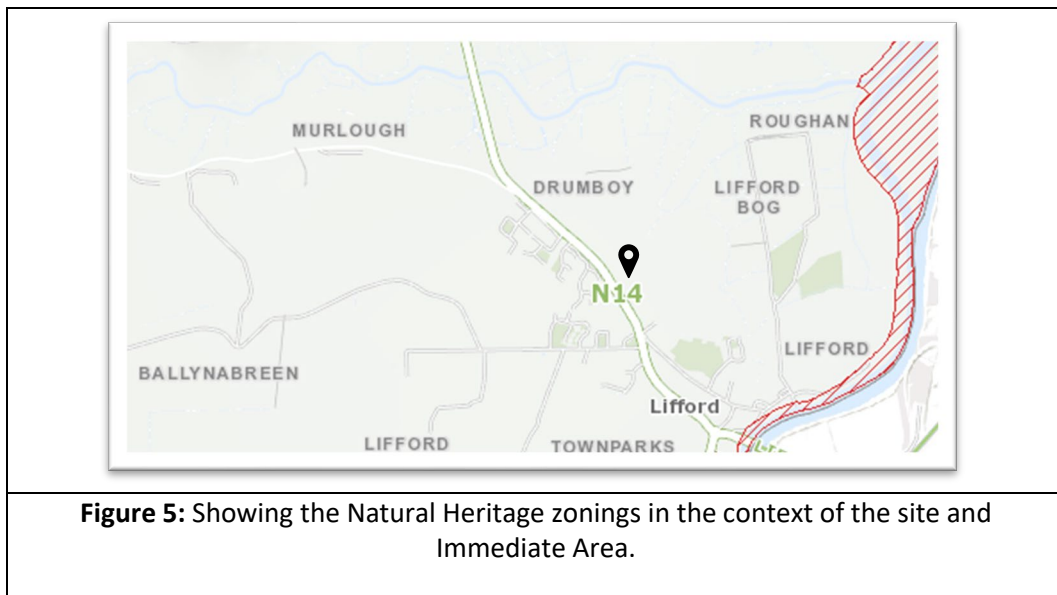
There is limited planning history associated with the site, two planning applications were submitted and withdrawn in 2010, in respect of the development of 44 No. Dwellings and 70 No. dwellings. Both proposals involved the installations of foul treatment plants and access roads. Due to the limited information available on the planning portal, it is unclear why both applications at the site were withdrawn.

## 5 Environmental Context

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### 5.1 Natural Heritage

The site location and immediate area shown on Figure 5 below. The site or adjacent area is not subject to any environmental designations; however it is c. 1,000m from the River Finn SAC and 5,000m from Feddyglass Woods. The Natura Impact Statement (NIS) (see Appendix 1) has been prepared due to the hydrogeological linkage between the proposed development site and the River Finn SAC and the River Foyle SAC. The NIS also notes that with the proposed mitigation there will be no impacts on these Natura 2000 sites.

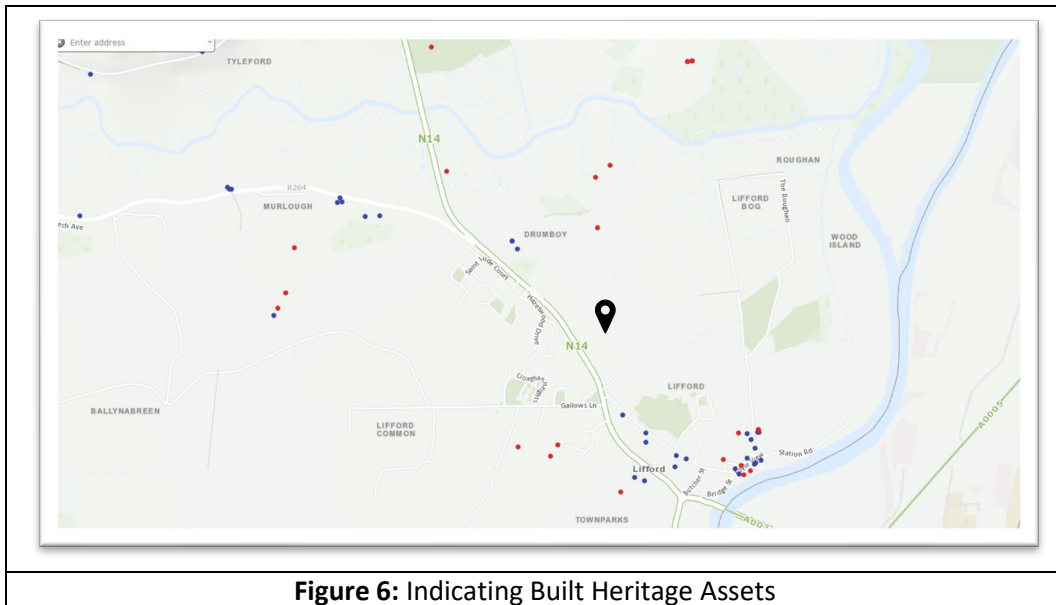


### 5.2 Built Heritage

There are a wide range of built heritage assets within the Lifford area. Figure 6 below details the known built heritage assets at the site and in the wider area. There do not appear to be any built heritage assets within or adjacent to the site boundary.

An Archaeological Assessment was carried out by John Purcell Archaeological Consultancy, which accompanies this application at Appendix 3. The Archaeological Assessment notes that *“A walk over archaeological survey of the area was undertaken. This did not identify any features indicative of sub surface archaeological remains”* (p26).

The Archaeological Assessment recommends mitigation in the form of archaeological testing prior to any site development. The assessment demonstrates that there will be no effects from the proposal on any protected structures, Architectural Conservation Area’s (ACA), archaeological sites or ancient monuments or other built heritage, it also ensures that should any archaeological remains be found at the site, their preservation will be ensured.

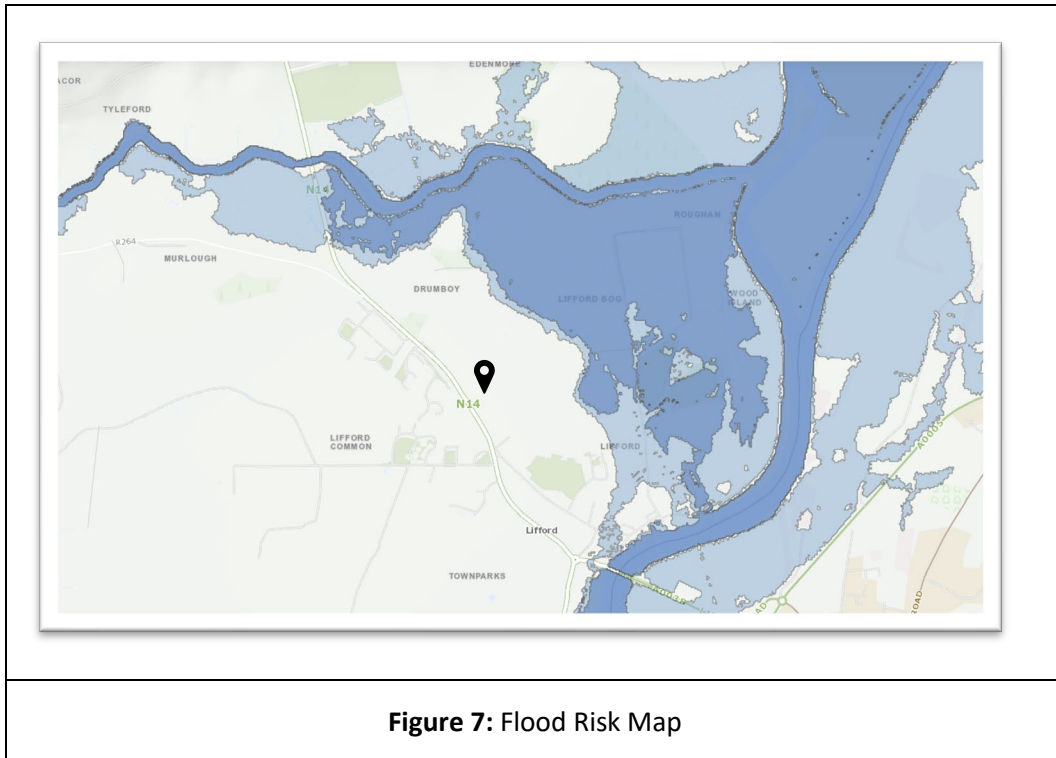


**Figure 6: Indicating Built Heritage Assets**

### 5.3 Flood Risk

Lifford has had a history of flooding due to the confluence of the River Finn and River Mourne creating the River Foyle – known locally as ‘The Three Rivers’. The area is also subject to the tidal influence of Lough Foyle. The Lifford Flood Relief Scheme is currently being planned to alleviate the risk of flooding for parts of Lifford.

The Office of Public Works (OPW) Flood Maps indicate that the north-eastern portion of the site is at high risk of flooding, however the south-western portion of the site falls outside any risk zone (See Figure 7). The entire site falls within the North-western Catchment Measures – aimed at managing or reducing flood risk. The southwestern portion of the site, closest to the N14 falls within the Lifford Measures – the Lifford Flood Relief Scheme outlined above. Both Measures involve sustainable planning and development management, namely the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009). A Flood Risk Assessment (FRA) accompanies this report, (Appendix 4). Consideration of policy relating to flood risk has been included at section 7.7 of this report.



## 6 Appropriate Assessment

The screening exercise was completed in compliance with the relevant European Commission and national guidelines. The potential impacts during the construction and operation of the proposed development have been considered in the context of the European Sites potentially affected, their qualifying interests, Special Conservation Interests and Conservation Objectives.

In accordance with Section 177U of the Planning and Development Act 2000 (as amended) and on the basis of the objective information provided in AA Screening Report, it was concluded that mitigation measures are required to ensure that the project will not have a likely significant effect on a European site (Natura 2000 site), namely the River Finn SAC. A Stage 2 Appropriate Assessment under Section 177V of the Planning and Development Act 2000 (as amended), was carried out. The resulting Natura Impact Statement (NIS) was prepared; the NIS demonstrates that the following mitigation will ensure that the Natural 2000 site will not be significantly affected by the proposed development.

### 6.1 Mitigation Measures

#### 6.1.1 General and pre-commencement measures

- A CEMP will be drawn up to incorporate industry best practices and will be strictly adhered to. An outline Construction Environmental Management Plan (oCEMP) is included at Appendix 5.
- The main pollutants of site water during construction phase are silt, fuel/oil, concrete and chemicals. Suitable storage and containment measures will be implemented to prevent pollution.

- Set procedures and designated wash-out areas will be provided, or alternatively vehicle wash-out will be prohibited if a suitable wash-out area is not identified.

## 6.1.2 Erosion and sediment control

- The existing drains and water courses running through and around the site will be fenced off using silt fencing and plant and machinery will be kept outside a 5 m exclusion zone for the duration of construction works.
- Temporary measures will be put in place to remove sediments, oils and pollutants. Fuels, oils, greases and hydraulic fluids will be stored in bunded compounds well away from the watercourse.
- Watercourse banks will be left intact if possible. If they have to be disturbed, all practicable measures will be taken to prevent soils from entering the watercourses.
- No muck, dirt, debris or other material shall be disposed on the public road or verge by machinery or vehicles travelling to or from the site during construction phase.
- A vegetated buffer strip will be retained around waterways during the operational phase and fenced off to prevent access to those using the recreational facility.

## 6.1.3 Storage of materials

- Materials will be ordered and delivered to site on an “as needed” basis in order to prevent over supply to site.
- Drums, oil and chemicals will be stored on an impervious base and within a secured bund.
- Topsoil and/or spoil heaps will be located at least 10m away from water courses.
- The Main Contractor will ensure that surface and ground waters are adequately protected from contamination by waste temporarily stored on development prior to disposal.

## 6.1.4 Disposal of waste

- All waste materials (where necessary, after in-situ reuse and recycling options have been fully considered) will be disposed off-site, under the appropriate Duty of Care and subject to approvals/consents from the relevant statutory bodies.
- The Main Contractor will prepare a detailed inventory of construction based hazardous waste generated, such as tars, adhesives, sealants and other dangerous substances, and these will be kept segregated from other non-hazardous waste to prevent possible contamination.
- Arrangements will be made for such substances for disposal in a safe manner to an authorized disposal site or by means acceptable to the relevant Authority.
- The Main Contractor will ensure that the excavation works are carried out in accordance with best standard practice and excavation materials are well segregated to minimize any potential cross contamination.
- There is no known contaminated soil present on the site but in the event that contamination is discovered during the course of construction the excavated material will be required to be disposed of in a licensed landfill site. A Generic Quantitative

Risk Assessment (GQRA) has been carried out (see Appendix 6) which indicates pose a low risk to human health, surface water and groundwater receptors

- Municipal waste collection services will be provided to residents during the operational phase.

#### **6.1.5 Sustainable Urban Drainage (SUDs)**

- The surface water runoff quality and quantity will be controlled through a SUDs strategy for the site.
- Permeable paving is to be put in place for private parking spaces. Swales will be placed along roads in open space areas and bioretention will be encouraged through tree pits in open areas. The surface water run-off from the development will pass through a series of SUDs devices which such as Filter drains and Geocellular SUDs tank infrastructure which will be located beneath the sports pitches adjacent to the watercourse and will attenuate outflows to equate to the greenfield outflows from the undeveloped site. A bypass petrol interceptor will be installed to mitigate the 'first flush' rainfall from the proposed roadway and the car park. The stormwater infrastructure will convey flows to the watercourse at the eastern site of the proposed pitches.

#### **6.1.6 Pollution prevention measures around the wastewater pumping station**

- The pumping station is to be located at an elevation above the flood line.
- The connecting wastewater treatment plant is to have sufficient capacity for all the effluent from the projected development.
- A permanent vegetated buffer strip planted with native species will be created and maintained around the pumping station.
- The wastewater pumping station will only be used once upgrades to the Lifford Wastewater
- Treatment Plant have been completed to a level that ensures there will be no overloading. The upgrades are being done under planning ref: 2051105 and are due to be completed in Summer 2022.

#### **6.1.7 Invasive Non-Native Invasive Species (INNS) Management plan**

- An invasive non-native species management plan has been drawn up, outlining measures to be taken to prevent the spread of Himalayan Balsam from the Site and the introduction of other INNS to the Site. A copy of the INNS is included at Appendix 7 to this report and recommendations within the Outline CEMP at Appendix 5.
- Permanent fencing will be erected to leave an inaccessible buffer around watercourses. Existing vegetation will be retained, and the buffer strip will be left as undisturbed as possible.
- All machinery and vehicles that were operated within a 10 m buffer from the waterways will be thoroughly cleaned to remove all soil and plant materials before being moved off Site.

A copy of the Natura Impact Statement has been included in Appendix 1 of this report.

## 6.2 Environmental Impact Assessment

Schedule 5 (Part 2) of the Planning and Development Regulations 2001 (as amended) lists various types of development and associated thresholds that require consideration of their environmental impacts. Where a proposed development falls within the type of development and meets or exceeds the relevant threshold, a mandatory EIA is required, taking into account the information set out within Schedule 7A of 2001 Regulations.

Part 10 (Infrastructure Projects) is the most relevant to this project:

### *10. Infrastructure projects*

*(a) Industrial estate development projects, where the area would exceed 15 hectares.*

*(b) (i) Construction of more than 500 dwelling units.*

*(ii) Construction of a car-park providing more than 400 spaces, other than a car-park provided as part of, and incidental to the primary purpose of, a development.*

*(iii) Construction of a shopping centre with a gross floor space exceeding 10,000 square metres.*

*(iv) Urban development which would involve an area greater than 2 hectares in the case of a business district, 10 hectares in the case of other parts of a built-up area and 20 hectares elsewhere.*

*In this paragraph, “business district” means a district within a city or town in which the predominant land use is retail or commercial use.*

The infrastructure works proposed were considered under Part 10(b)(iv). As the extent of the proposed development is 3ha, falling below the threshold a mandatory EIAR was not required under the 2001 Regulations. However, a consideration of this sub-threshold development was carried out, an EIA screening report under Schedule 7A of the Regulations was submitted to An Bord Pleanála on 10 February 2022 (ref: ABP-312711-22) under Schedule 120 of the 2001 Regulations to allow An Bord Pleanála determine if the application required to be submitted with a full Environmental Impact Assessment Report (EIAR).

To date we have not received any findings from An Bord Pleanála

An Bord Pleanála considered the findings of the Schedule 7A Screening Report and considered that the application did not require to be submitted with a full EIAR.

The screening report accompanies this report at Appendix 8.

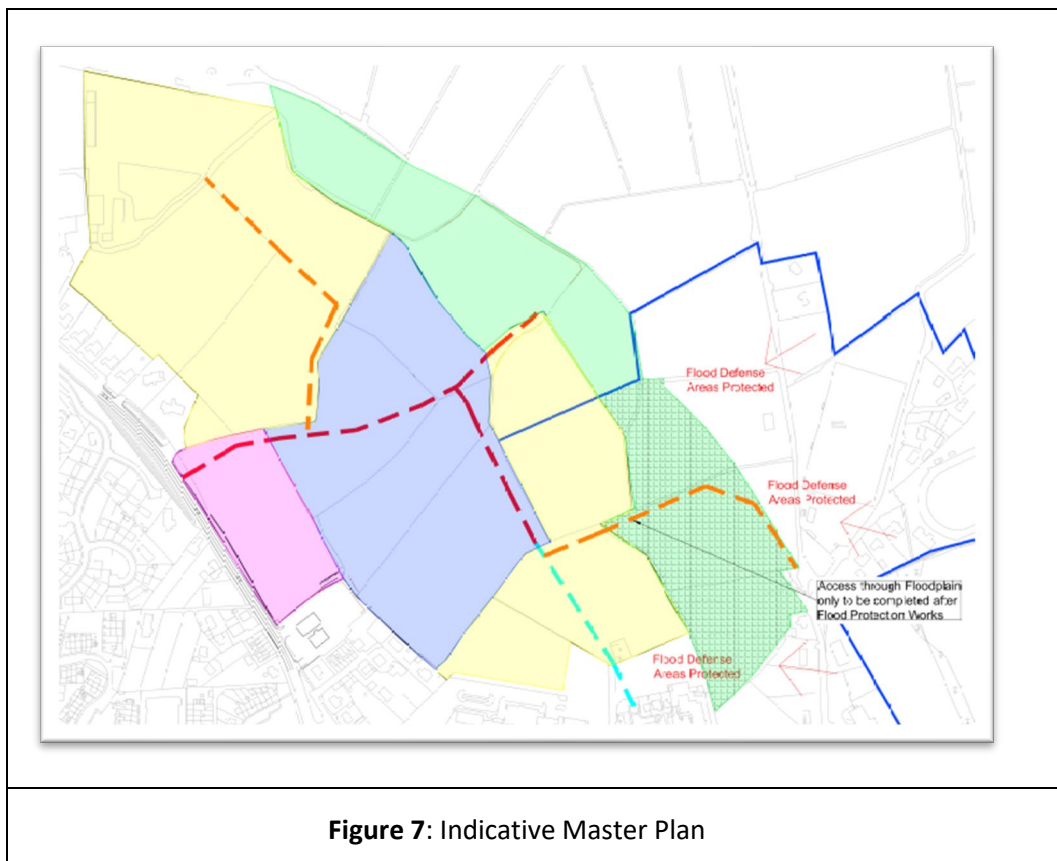
## 7 Policy Considerations

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The proposals seek to create a community recreational facility, consisting of two football pitches, and associated parking. The development also includes a wastewater pumping station and access road.



As outlined above in Section 3.3, the site lies within a larger area zoned as an Opportunity Site within the County Development Plan. The plan advises that the Opportunity Site has potential for a mixed-use development including proposals of an economic and employment generating nature. It states that a masterplan for the overall broad layout of land use types within the site shall be required and all other objectives and policies of this plan shall apply. A Masterplan for the entire opportunity site has been provide (See Drawing LIFF-MCA-ST1-00-DR-C-1002) and Figure 8 below.



**Figure 7:** Indicative Master Plan

The County Development Plan provides land use objectives and advises that opportunity sites are zoned 'to provide for specific development opportunities that are appropriate in terms of mix of use and compatibility with the wider area whilst recognising features of importance that are specific to the site'.

The proposed development of community recreation facilities complies with the broad land use zoning of this mixed-use opportunity site. Policy CCG-P-1 of the County Development plan, advises that "It is a policy of the Council to consider development proposals for ... sports/recreational facilities ... in accordance with the following locational criteria:

- (a) At locations within the defined boundaries of settlement framework/urban areas which are within safe walking distance (i.e., via an existing or proposed footpath) of local services and residential areas and which would otherwise promote social inclusion.**

The proposed development is contained within the Lifford settlement framework, the proposed roads infrastructure that accompanies this development will provide easy and

safe pedestrian and cycle access to the site from Lifford town, this also complies with policies CCG-P-12 and T-P-14 that require that relevant development proposals have appropriate regard for walking and cycling which will promote physical activity and reduce car use and that adequate cycle lanes, stands and ancillary facilities be provided.

Policy CCG-P-4 provides the general criteria for the development of sports/recreational facilities. These criteria are listed below.

***(a) It is compatible with surrounding land uses existing or approved***

The existing land use in this area has been established as predominately agricultural, there are no extant planning approvals in the vicinity of the proposed development. As outlined above the site is contained within a wider mixed use opportunity site, it is considered that the proposal is compatible with the existing land use and any future mixed used proposals.

***(b) It will not have a significant impact on adjacent residential amenities.***

The closest residential dwelling to the proposed recreation facility is located some 250m east of the site at Lifford Bog. A Noise Impact Assessment was carried out by Layde Consulting and is contained in Appendix 9 of this report. The Noise Impact Assessment advises that modelling of all noise sources attributable to the proposed development took place in order to assess the cumulative impacts of all sources:

*The results demonstrated that predicted future noise levels associated with the proposed foul pumping station and access road will be well below the existing background level. Therefore, in accordance with BS4142:2014, this is an indication that noise impact from these sources will be negligible. (p13)*

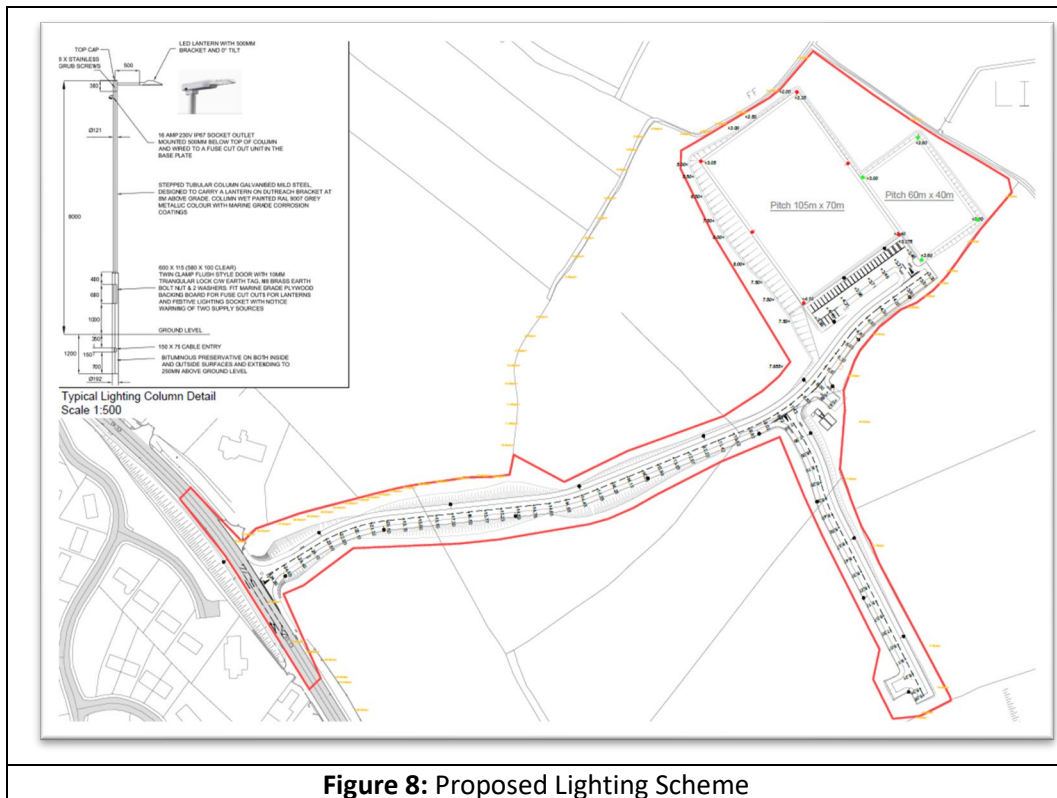
The proposed development will not have any negative impact upon the closest residential properties.

Six 18m high floodlighting columns are proposed around the larger 7350sqm pitch, and additional four 15m high floodlighting column area proposed around the smaller 2400sm pitch (see Figure 8).

The Light Assessment at Appendix 10 of this document indicates that the floodlights will be directed towards the centre of each pitch to minimise light spill to the surrounding area, and each floodlight will have a peak beam angle of 55 degrees to minimise sky glow.

*“It has been assessed that the horizontal illuminance at a distance of 75 metres from the large sports pitch in the direction of the N14 road will be 0 lux, therefore the existing residential properties will not be impacted by light spill.”*

It is anticipated that floodlighting will be used only in the winter months, with lighting not employed after 10pm.



**Figure 8: Proposed Lighting Scheme**

The sites access is located c. 45m from a residential dwelling on the N14, the existing dense hedgerow and mature vegetation will be retained in as far as practicably possible, however, some vegetation is required to be removed to provide adequate visibility at the site access. The noise impact assessment demonstrates that there will be no significant adverse impact on this residential property.

***(c) There is existing or imminent programmed capacity in the public water waste infrastructure for developments within urban areas or suitable on-site effluent treatment facilities to EPA standards can be provided in rural areas.***

The proposed development includes the provision of a gravity fed wastewater pumping station. The pumping station and ancillary development has been designed in collaboration with Irish Water, it is considered to go above and beyond the requirements for the recreation facilities and will future proof any future development within the opportunity site. While it is understood that the existing Lifford Waste Water Treatment Works (WWTW) is currently operating above capacity, the proposed recreational facility will not come into operation until the upgrading works are completed on the Lifford WWTW, which are currently underway and due for completion in later this year, Irish Water has confirmed that completion is due in Summer 2022.

***(d) It does not cause a traffic hazard and the existing road network can safely handle any extra vehicular traffic generated by the proposed development.***

It is anticipated that the proposed recreational facility will result in a modest volume of traffic using the site, approximately 20 vehicles per day during the week and 30 vehicles per day at the weekend. This modest volume of traffic will not result in a hazard and the N14 National Road can easily accommodate this volume of the traffic.

It is worth noting that the proposal involves the relocation of the existing Lifford Celtic football pitches, the vehicular movements are already existing within Lifford and this

proposal will result in the redistribution of traffic from the current site, in the southeast of Lifford to the proposal site at Lifford Common.

The proposals include a right turning lane, to ensure that traffic access the site from the south will not result in traffic hazard for traffic moving north. The road network has been designed easily accommodate the proposed recreation use and the future development of the wider opportunity site.

Consultation has taken place with Transport Infrastructure Ireland (TII), who has accepted the Design Report (Appendix 11). The Traffic and Transport Assessment with Road Safety Audit, compiled by Hoy Dorman Limited, contained in Appendix 12 clearly demonstrate that the proposed development will not result in a safety or traffic hazard at the site.

***(e) Adequate parking provision, access arrangements, manoeuvring and servicing areas are provided in line with technical standards and policies of this Plan.***

As outlined above, the proposed access road from the N14 National Road has been over designed to future proof the road network for any future developments within the designated opportunity site. The access arrangements have been carried out in consultation with TII. Further details of the access arrangements are found in section 7.2 of this report.

33 car parking spaces have been provided, with 3 disabled spaces and 3 Sheffield stands providing 15 cycle spaces. The parking standards as laid out in the County Development Plan require the provision of 30 car parking spaces per primary pitch and a minimum of 5 cycle spaces. The proposal clearly provides car parking in excess of the requirements. Spaces have also been set aside for the provision of e-charging points for electric vehicles. As the site is contained within the settlement framework and it is envisaged that those using the site, will walk or cycle rather as well as using a vehicular means of transport. This rationale is in keeping with policies T-P-11 and CCG-P-12 of the County Development Plan that state:

*“The Council to facilitate the appropriate development of affordable, multimodal transport solutions that offer communities and future generations real transport choices such as park and ride; pedestrian and cycling; bus and taxi services; and ancillary infrastructure.”*

*“It is a policy of the Council to ensure that relevant development proposals have appropriate regard for walking and cycling which will promote physical activity and reduce car use.”*

The Traffic Statement notes that an average of 20 vehicles visit the site during the week and some 30 vehicles at the weekend. The proposed level of car parking will be sufficient to accommodate these visitors and any potential additional visitors to the site.

***(f) The layout of the development provides for a high level of, and prioritises, pedestrian permeability and access.***

The proposed development includes the provision of footways from its access with the N14 National Road to the proposed recreation facility. These proposed footways will ensure pedestrian permeability and access throughout the site, with uncontrolled pedestrian crossings and a link to the existing Lifford Greenway.

***(g) It does not create a noise nuisance and will not cause any significant environmental emissions.***

As outlined above a Noise Impact Assessment has been carried out by Layde, the impact assessment indicates that the proposal will not generate any rise in the background noise levels at the site. It is also noted the closest residential properties to the proposed development will not be significantly impacted by the development in terms of noise emissions.

The proposals do not involve the creation of any industrial pollutants and as such there will be no emissions resulting from the proposed development.

***(h) The location, siting, and design of the development including associated infrastructure and landscaping arrangements is of a high quality and does not have an adverse impact on the host landscape, does not have an adverse impact on/successfully integrates with the streetscape, vernacular character or built environment of the area.***

The site is undulating in nature, falling away from its boundary with the N14 towards the most easterly boundary of the site. The proposed recreation facility is composed of 2 pitches and associated car parking. These proposed developments are located in the most easterly and low-lying area of the site, the proposals have been sited in this area to make best use of the topography of the site, allowing the proposed development to integrate into the rising land to the west. The existing boundary hedging on the eastern boundary of the site will be reinforced to assist in screening the site from Lifford Bog.

***(i) Appropriate boundary treatment and means of enclosure are provided and any areas of outside storage proposed are adequately screened from public view***

As outlined above the proposed development makes best use of the existing topography of the site to provide integration with the existing landscape. The existing boundary hedging on the eastern boundary of the site will be reinforced to assist in screening the site from Lifford Bog. The proposal does not involve the provision of any outside storage.

***(j) It does not have an adverse impact on the built, scenic, or natural heritage of the area including structures on the RPS/NIAH and Natura 2000 sites***

The drainage ditches to the east of the site are hydrologically connected to the River Finn SAC (Natura 2000 site). The NIS that accompanies this application (please see Appendix 1) provides a range of mitigation measures that will be employed to ensure the proposed development will not impact on the River Finn SAC.

A desktop Archaeological Assessment has been carried out at the site (see Appendix 3), the assessment indicates that there are no surface level built heritage assets at the site, the assessment proposed mitigation to ensure the proposal will not have any impact on built heritage assets.

The site is located within an area of moderate scenic amenity, the County Plan notes that Areas of Moderate Scenic Amenity are primarily landscapes outside Local Area Plan Boundaries and Settlement framework boundaries, that have a unique, rural and generally agricultural quality. The proposed site is contained within the settlement framework of Lifford, the plan also notes that; anomalies in landscape designation shall be considered individually and in the context of all other objectives and policies contained within this Plan. As the site has been designated as an opportunity site for mixed use

development, it is considered that the proposed use of the site is acceptable in terms of its position within an area of moderate scenic amenity.

***(k) It is not located in an area at flood risk and/or will not cause or exacerbate flooding***

The recreation facility including the pitches and ancillary car parking are located within the floodplain, however the County Plan notes that Water Compatible Development is appropriate in this area (Part A Table 5.4.2). Table 3.1 of The Planning System and Flood Risk Management - Guidelines for Planning Authorities (DoEHLG, 2009) provides the Classification of Vulnerability for different types of development, it advises that “*Water Compatible Developments include: Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms.*”

The proposed development can be classified as a water compatible development and such its development within this area of the flood plain is considered acceptable.

***(l) It does not compromise the water quality of water bodies with River Basin Districts designed under the Water Framework Directive or hinder the programme of measures contained within any associated River Basin Management Plan.***

The detailed drainage plans provided by McAdam Design indicate that any foul sewage will be directed to the Wastewater Pumping station which will in turn pump the flows to the Irish water pipelines within the main road with the Irish Water approvals

Stormwater infrastructure has been designed to accommodate the flows within the proposed roadway, these flows will be restricted via Flow Control Devices and attenuated by a series of SUDs infrastructure such as Filter drains / Infiltration Trenches and Geocellular SUDs tank infrastructure which will be located beneath the pitches adjacent to the watercourse. By way of water quality mitigation, it will be the intention within the design to install a bypass petrol interceptor to mitigate the ‘first flush’ rainfall from the proposed roadway and the car park.

The Drainage Assessment carried out by McAdam (see appendix 13) notes that “the proposed storm drainage for the development will not exceed current ‘Greenfield’ runoff rates to the adjacent watercourses with the inclusion of appropriately sized storm water attenuation and associated flow control.”

The Drainage Assessment also advises that surface water mitigation measures for the scheme and risk from pluvial flooding will be managed and will not increase the runoff elsewhere. Proposed levels at the site, have been so designed to ensure that no properties will be subject to flooding in the event that there would be a system failure to the local drainage system.

## **7.1 Design, Layout and Access**

As outlined in Section 2 of this report, the proposal involves the creation of some 720m of access road including footways and cycle lanes. The site will be accessed via the N14, with considerable upgrades provided to the existing agricultural access. As outlined in Section 7.1 above, the proposals have been designed to future proof any further development within the zoned opportunity site, with footpaths, cycle lanes and street lighting, following consultations with both the National Roads Authority and Transport

Infrastructure Ireland, with the provision of a right-hand turning lane from the N14, in compliance with policies T-P-8, T-P-12, T-P-14 of the County Development Plan.

The County Development Plan T-P-4 advises that the Council will not permit a new access or intensification of an access onto a National Road with a speed limit greater than 60Kph. The speed limit at the point of access is 60kph and as such policy T-P-4 does not apply.

Policy T-P-5 of the County Plan promotes quality and connectivity provided through the identified Strategic Road Network (Map 5.1.2), subject to environmental, safety and other planning considerations. The N14 is identified as a Strategic Road and as such quality connections to this road are considered acceptable.

A Traffic and Transport Assessment and Road Safety Audit has been compiled by Hoy Dorman Limited (See Appendix 11) in compliance with policy T-P-8. The Traffic Statement and Road Safety Audit demonstrates that the existing road network can easily accommodate the proposals. Modelling has been completed to indicate the future site in +5years and + 15 years, both models indicate that there is significant future capacity at the junction with the N14 for future development in relation to the wider opportunity site lands. Any impacts on the road network will be at the construction stage, they will be short lived and normally expected during this phase of the development.

Policy T-P-6 sets that all new development is some 50m from the N14, the proposed development including recreational pitches and wastewater pumping station are set back over C. 250m from the boundary with the N14.

The proposed development provides a safe and convenient access onto the N14 above the required standards. The proposals include footways and cycle lanes which directly promote the Councils objectives of encouraging pedestrian and cycle permeability.

Policy BH-P-12 requires the sensitive design, siting and rationalisation of modern street furniture and elements such as lighting, street signs, paving and kerbstones which will visually integrate with their host locations. The proposed street lighting and all paving works have been designed to be reflective of the standards already seen within the Lifford area. They will integrate within the host location and the wider Lifford settlement framework.

## **7.2 Parking**

As outlined in Section 7.1 above, the scheme will involve the creation of 33 No. car parking spaces associated with the recreation facility. The County plan requires that a portion of spaces are reserved with people with disabilities and that electric charging points are provided, accordingly 10% of the spaces provide are accessible spaces and provision has been made for electric charging spaces.

## **7.3 Natural Environment**

The Country Development Plan Natural Heritage Policies include Policies NH-P-7, NH-P-9 and NH-P-13. As previously outlined the site is located within an area of Moderate Scenic Amenity, it is considered that given the sites location within a settlement framework the proposed development is of a nature, location and scale that allows the proposed

recreation facility to integrate with and reflect the character and amenity of the landscape, in compliance with policy NH-P-7.

The County Plan also advises under policy NH-P-9: that:

*“It is the policy of the Council to manage the local landscape and natural environment, including the seascape, by ensuring any new developments do not detrimentally impact on the character, integrity, distinctiveness or scenic value of the area.”*

The proposed development will not negatively impact on the character of the area, the proposals have been designed to sensitively sit within their unique setting, of a large greenfield site within the settlement framework. The design of the proposal has taken account the existing topography of the site and its constraints, ensuring a water appropriate development is located within the existing flood plain. The proposed development is in keeping with the semi-urban character of the area and will not lead to an increased flood risk.

Policy NH-P-13 advises that:

*“It is a policy of the Council to protect, conserve and manage landscapes having regard to the nature of the proposed development and the degree to which it can be accommodated into the receiving landscape. In this regard the proposal must be considered in the context of the landscape classifications, and views and prospects contained within this Plan and as illustrated on Map 7.1.1”.*

A Preliminary Ecological Appraisal (PEA) (See Appendix 2) was carried out.

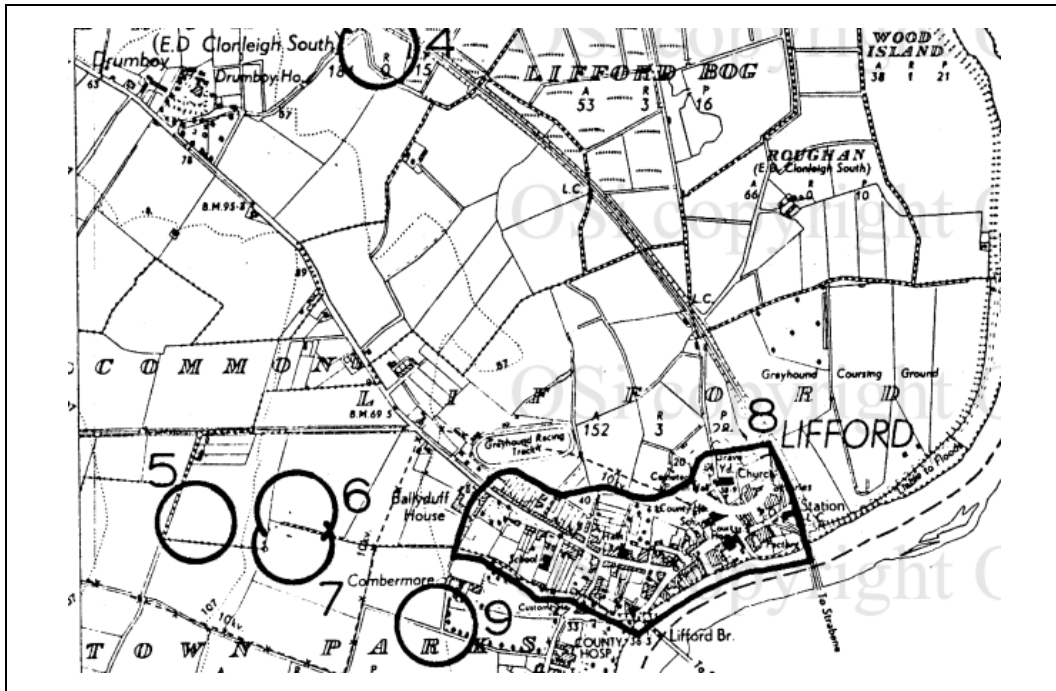
## **7.4 Archaeology**

The Donegal County Plan seeks to conserve and protect the County’s archaeological heritage for present and future generations. Policy AH-P-2 advises

*“It is the policy of the Council to conserve and protect Zones of Archaeological Potential located in the urban areas of Ballyshannon, Donegal Town, Killybegs, Lifford, Ramelton, Rathmullan and St. Johnston as identified in the Record of Monuments and Places.”*

Figure 9 below indicates that the proposed development does not lie within the zoned of Archaeological Potential as set out in the Record of Monuments and Places. An Archaeological Assessment was carried out by John Purcell Archaeological Consultancy, which accompanies this application at Appendix 3. It confirms that *“A walk over archaeological survey of the area was undertaken. This did not identify any features indicative of sub surface archaeological remains” (p26)*





**Figure 9:** Map Extract from the Record of Monuments and Place

## 7.5 Public Lighting

The proposal involves the installation of 23 streetlights along the proposed road, it is noted that policy T-P-12 of the County Plan seeks the provision of lighting at appropriate locations subject to environmental, safety and amenity considerations. As demonstrated in the lighting report and associated drawings (Appendix 10), the proposed street lighting will have no impact on the environment or amenity of nearby residents.

## 7.6 Flood Risk

As outlined above, part of the proposal lies within the Flood Plain, as such a Flood Risk Assessment (FRA) has been carried out at the site, in compliance with policy F-P-2 The FRA can be found in Appendix 4 of this report, notes that the development is at risk of fluvial flooding from the Deele Rover and River Foyle. The FRA also notes that the proposals comply with the development management/land use requirements for the OPW Guidelines (Pg11). The FRA notes that the proposals will lead to a net gain in floodplain storage at the site, which will reduce the overall flood risk to adjacent lands.

The proposal is considered a water compatible development, in Table 3.1 of the Donegal County Plan 2018-2024: which states water compatible development includes “*Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms*”. Whilst there is no building proposed, it is considered that the development of a car park is an essential facility associated with the proposed recreational pitches. The proposed car parking will be made of permeable materials and would greatly reduce any potential impact for flooding when compared to a building providing changing facilities. Further to this the FRA has indicated that the proposals will lead to a net gain in floodplain storage at the site, which will reduce the overall flood risk to adjacent lands. The OPW matrix of vulnerability, shown in Figure 10, does not require the completion of a

justification test. However, where a Justification Test is still required by the Planning Authority, relevant information relating to the proposal can be found within the Flood Risk Assessment at Appendix 4 to this document.

	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate

**Figure 10: Matrix of vulnerability**

The FRA advises that Flood Management Plan (FMP) is implemented for the proposals. The FMP will undertaken prior to the commencement of the Recreational Pitches and will incorporate the following:

- Identification of sources of flood warnings.
- Identification of person(s) responsible for activating the emergency plan.
- Identification of levels of alert (Alert / Warning / Severe) and specific actions to be taken (including warning signals, if applicable).
- Identification of ‘safe / flood-free zones’ and muster points.
- Identification of contact groups and individuals to be notified in the event of or prior to a flood.
- Identification of Emergency Contacts

The proposed recreation facility and accompanying ancillary infrastructure is considered a water compatible development, it does not increase the risk of flooding at the site or within the wider area and is appropriate within this area of increased flood risk.

## 7.7 Services – Wastewater

The proposed development includes the provision of a gravity fed wastewater pumping station. The pumping station has been designed in collaboration with Irish Water to meet and exceed the required standards. The wastewater pumping station and its accompanying infrastructure have been designed to provide sufficient capacity should a changing room building be required at the site in the future and over designed to ensure that any future development within the opportunity sites has sufficient capacity. See Drawings LIFF-MCA-ST1-00-DR-C-3100 and LIFF-MCA-ST1-00-DR-C-3001, within the drawing pack.

The Foul infrastructure consists of a network of manholes and pipelines traversing down the roadway under gravity flow where achievable (see Drawing LIFF-MCA-ST1-00-DR-C-2000 within the Drawing package). These will convey flows to the proposed Wastewater

Pumping station which will in turn pump the flows to the Irish water pipelines within the main road with Irish Water approvals. As previously outlined, the proposed development will not become operational until such times as the ongoing upgrades to the Lifford WWTW have come into effect.

The proposed wastewater specifications comply with policy WES-P-11 of the County Development Plan in that they both support and facilitate Irish Water to ensure that wastewater generated is collected and discharged in a safe and sustainable manner.

## **7.8 Services – Surface Water**

The proposed development will provide sufficient surface water drainage on the road including optimising levels and providing correctly located gullies in accordance with TII standards.

Drainage collection will be via kerb and gullies which will connect into the proposed storm drainage network and the proposed gravity fed wastewater pumping station which outfalls to local watercourses.

Policy F-P-5 of the County Development Plan advises that 'It is a policy of the Council to promote the use of Sustainable Urban Drainage Systems (SUDs), flood attenuation areas, the controlled release of surface waters and use of open spaces and semi permeable hard surfaces for appropriate development proposals'. As outlined above the surface water runoff quality and quantity will be controlled through SUDs including:

- Filter drains and Geocellular SUDs tank infrastructure which will be located beneath the sports pitches adjacent to the watercourse and will attenuate outflows to equate to the greenfield outflows from the undeveloped site.
- A bypass petrol interceptor will be installed to mitigate the 'first flush' rainfall from the proposed roadway and the car park.
- The stormwater infrastructure will convey flows to the watercourse at the eastern site of the proposed pitches; and
- Permeable paving is to be put in place for private parking spaces at the recreation facility.

The proposed SUDs will provide the effective management of surface water and complies with Policy F-P-5 of the County Plan.

## **8 Conclusion**

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The proposed recreation facility, access road and supporting infrastructure are in compliance with the polies and objective of the Donegal County Plan 2018-2024 as varied. The proposals will not negatively impact on neighbour amenity, the existing road network or the Irish Water network. The proposals will not have a significant impact on the River Finn SAC, nor will they have any environmental or archaeological impacts. While a portion of the proposal is located within a flood plain, there will be no increase in the probability of flood at the site or elsewhere.

The proposed development as set out in the plans and particular is considered acceptable and is consistent with the principle of the proper planning and sustainable development

of the area. Therefore, it is recommended that the proposed development should be granted planning approval.

## Appendices (see separate documents)

	Report	Consultant
Appendix 1	Natura Impact Statement (January 2022)	Blackstaff Ecology
Appendix 2	Preliminary Ecological Assessment Report (October 2021 & May 2022)	Blackstaff Ecology
Appendix 3	Archaeological Assessment (February 2022)	John Purcell Archaeological Consultancy
Appendix 4	Flood Risk Assessment (May 2022)	McCloy Consulting
Appendix 5	Outline CEMP (May 2022)	Carlin Planning
Appendix 6	Generic Quantitative Risk Assessment (GQRA) (May 2022)	Tetra Tech
Appendix 7	Outline Invasive Non-Native Species Management Plan (May 2022)	Delta Simons
Appendix 8	EIA Screening (February 2022)	Carlin Planning
Appendix 9	Noise Impact Assessment (March 2022)	Layde Consulting
Appendix 10	Lighting Impact Statement (May 2022)	McAdam Design
Appendix 11	TII Design Report (April 2022)	McAdam Design
Appendix 12	Recreational Facility & Spine Road Traffic Statement (April 2022)	Hoy Dorman
Appendix 13	Drainage Strategy (May 2022)	McAdam Design