



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

**Donegal County Council
Community & Planning Services Directorate**

PLANNING AND DEVELOPMENT ACT 2000 (AS AMENDED)
PLANNING AND DEVELOPMENT REGULATIONS 2001 (AS AMENDED)
ARTICLE 81

Proposed Enterprise and Digital Hub Building
(Alpha Building), Ballyraine, Letterkenny, Co. Donegal

Part 8 Planning Report

August 2019

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| Item No. | Drawing No. | Title |
|----------|---------------------|----------------------------------|
| 1 | 2019011/002/003-001 | Site Location/Site Extents Plan |
| 2 | 2019011/002/003-002 | Proposed Site Plan |
| 3 | 2019011/002/003-003 | Ground floor & first floor plans |
| 4 | 2019011/002/003-004 | Second floor & roof plan |
| 5 | 2019011/002/003-005 | Elevations & Sections |

1. Nature of the Works

Donegal County Council proposes to carry out the following works;

Development of a new three storey enterprise and digital hub facility with a total floor area of 1640m² located within the Letterkenny Enterprise Quarter Site to facilitate a range of business establishments and expansion opportunities.

Associated ancillary works to include site drainage, parking, connection to the public water supply and other services, landscaping, appropriate boundary treatment, development related signage, connection & discharge to the public sewerage network.

All associated ancillary site works shall be located within the townland of Ballyraine^{TD} in the Letterkenny Milford Municipal District.

2. Extent of the Works

The proposed development is contained within a 0.469ha (1.16 Acre) site adjacent to the proposed Social Enterprise Centre, Letterkenny Public Services Centre and the Neil T Blaney Road (R250) located within the townland of Ballyraine^{TD} in the Letterkenny Milford Municipal District.

The overall extent of the proposed works is shown on Drawing No. 2019011/002/003-001 – 001 Site Location/Site Extents.

3. Access

Access to the site, on completion of the Joe Bonnar Link Road project, will be via a new access. It is intended for this access to be shared by the proposed Social Enterprise Centre and the PSC.

4. Site Clearance and Enabling Works

There is no record of any structures past or present on the site. The site is currently covered with stone ballast.

5. Site Analysis

Lands are currently undeveloped land owned by DCC for future Town Centre Development

Land to East of Proposed Enterprise & Digital Hub Building (Alpha Building)

Planning approval granted at the July Plenary Council meeting for the development of a new 3-storey Social Enterprise Centre with a total floor area of 1250m². Further East is the Letterkenny Public Service Centre.

Land to West of Joe Bonnar Link Road

Currently undeveloped land owned by DCC for future Town Centre Development. Further West is an Aldi Retail unit.

Land to North/North West of Proposed Enterprise & Digital Hub Building (Alpha Building)

Planning approval granted at the July Plenary Council meeting for the development of a Linear Park/Greenway which will begin at the intersection with the new Joe Bonnar Link Road and travel in a westerly direction for a distance of 380m before terminating at Isle lane/Sprackburn. Further North on the Joe Bonnar Road is a mix of Warehouse Industrial and retail / commercial units. North of the PSC is a four storey Residential Accommodation.

6. Letterkenny Enterprise Quarter

An external Consultant was procured by Donegal County Council to develop a design approach to the Council owned lands adjacent to the PSC and enclosed by the New Joe Bonnar Link Road. This would identify a series of phases to developing the site. It is intended that the proposed Social Enterprise Centre and a section of the proposed Linear Park/Greenway would be the first phase within this development plan.

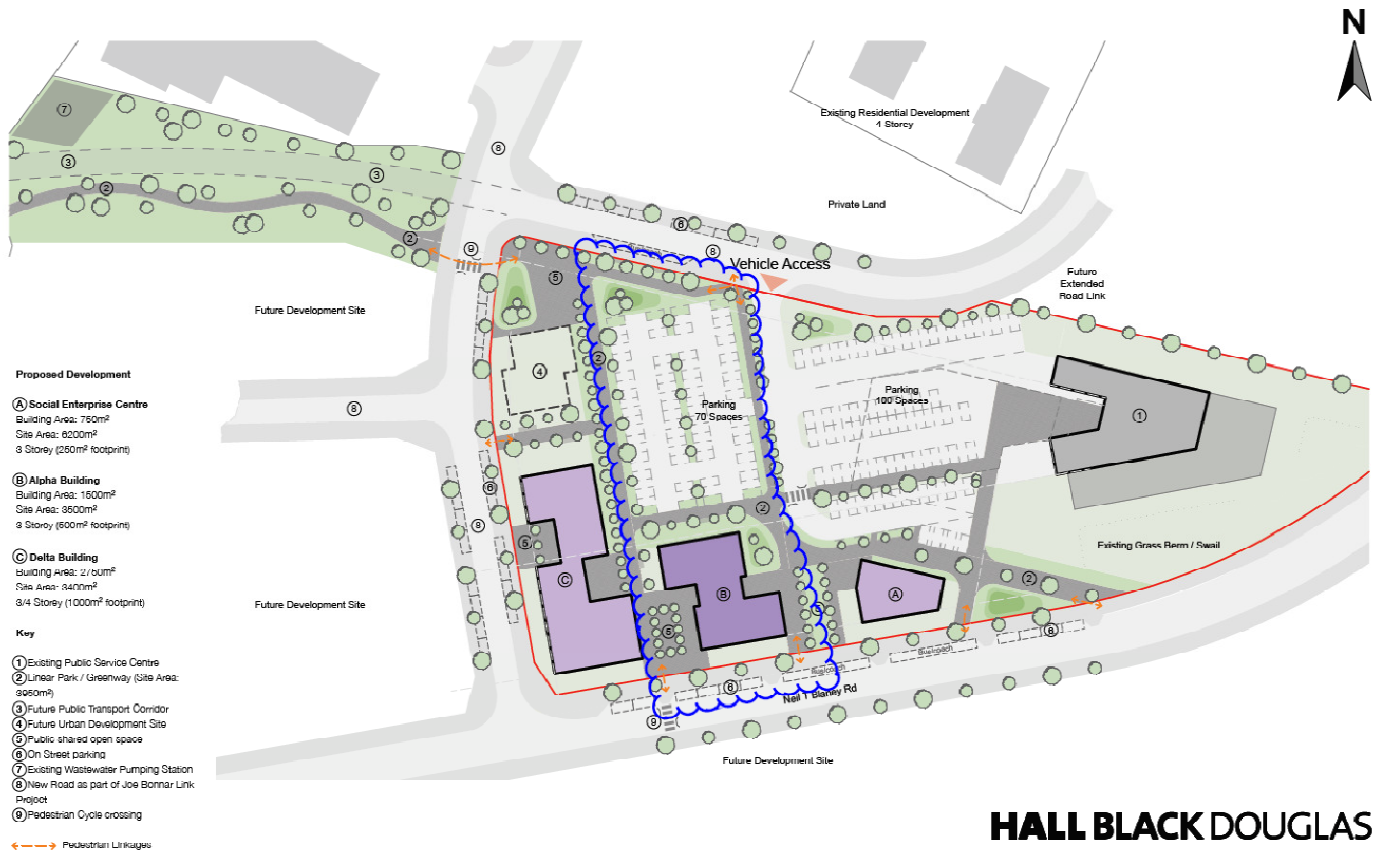
Donegal County Council and the Consultants met with the Council’s Planning Department and reviewed key principles and considerations for the development of the site. As part of this the ‘Letterkenny Enterprise Quarter’ (LEQ) Masterplan was developed.

Donegal County Council’s Urban Design Framework for Letterkenny highlights a number of key development principles for the overall site. As town Centre the LEQ development will create street frontage to Neil T Blaney Road and Joe Bonnar Link Road. The proposed car parking arrangements will have regard to the location of the lands within the defined town centre; with an overarching objective to support and prioritise walking and cycling; and implementation of a linked network of walking and cycling infrastructure; proposals for regeneration in this area.

Letterkenny Enterprise Quarter (MAP 10)

Masterplan
September 2018

Proposed Enterprise & Digital Hub Building (Alpha Building)



HALL BLACK DOUGLAS

| | | | |
|--|----------------------------------|---------------------------------|--------------------|
| Architects 152 Riverbridge Road Ballisodare BT9 4AS | Project Letterkenny 2040 | Drawing Title LEQ Masterplan | Scale 1:1000 |
| hallblackdouglas.com 028 9045 0661 | Client Donegal County Council | Drawing No. 1718-SK-007-01 | Date 25/09/2018 |
| | | Drawn/Chk JS JS | |

7. Layout & Form

The proposed Enterprise & Digital Hub building (Alpha Building) sits within the context of the newly formed masterplan for the site adjacent the proposed Social Enterprise Centre (SEC) and the existing Public Services Centre bound to the south by the Neill T Blaney Road and to the west by the Joe Bonnar Link Road. The design of the building has been considered as a 3 dimensional sculptural form relating to its context. Consideration has been given to how it is approached along each vehicular and future pedestrian routes and also in how internal views are framed to their surrounding landscape.

The main entrance to the building is to the East which opens directly to the large Public External Square which is shared with the adjacent SEC. The Atrium provides a large open plan space with reception, lifts, WC's, and stairwells and private office space on the ground floor with additional office space provided on the remaining two floors above.

8. Materials

In consultation with DCC Planning Section the building envelope materials were considered and the following quality criteria determined:

- The building will set a standard of quality and scale appropriate to the Town Centre location.
- Materials will be of a high quality and appropriate to the location.

Refer to appended drawings for details on the external envelope materials.

9. Technical Analysis

The Letterkenny Enterprise Quarter is a Masterplan for the entire site adjacent to the existing Public Service Centre and the Joe Bonnar Link Road. The design has been developed with an overarching objective to support and prioritise walking and cycling; and implementation of a linked network of walking and cycling infrastructure; proposals for regeneration in this area.

The proposed car parking arrangements will have regard to the location of the lands within the defined town centre; with an overarching objective to support and prioritise walking and cycling; and implementation of a linked network of walking and cycling infrastructure; proposals for regeneration in this area as defined in LK-T-P-7 & 8.

LK-T-P-7: Traffic Management Programme

It is the policy of the Council to implement a programme in relation to Urban Junctions. This programme will involve a linked signal system to manage movement into and around the town, through which pedestrians and cyclists are given equal weighting with traffic.

LK-T-P-8: Cycling and Walking

The Council will promote the development of cycling and walking as a viable transport option. To do so, all development proposals shall be accompanied by appropriate levels of provision for cycle and pedestrian movement including:

- i. Covered secure cycle parking which is convenient and located to allow for informal surveillance
- ii. Pedestrian and cycle friendly routes throughout new residential areas
- iii. Footpaths and cycle provision in order to adequately and conveniently access public transport, services/amenities and connect with the wider locality.

10. Parking Proposals

As part of the Joe Bonnar Link Road Project Bus / coach stopping provision will be provided on the Neil T Blaney Road. It is recommended that large vehicles movement on the site are managed to promote pedestrian safety.

The proposed Alpha Building will provide for;

- 40 No. car parking spaces
- 5 No. Disabled spaces
- Minimum 12 No. secured covered bicycle parking

11. Flood Risk Analysis

Refer to Appendix B

Following the Flood Risk analysis it is proposed to set the Ground Floor Level above Flood Plain level at +4.10m OD Malin. This is approximately 350mm above the Existing Neil T Blaney Road Level.

Appendix A – Planning Notice



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

**PLANNING AND DEVELOPMENT ACT 2000 (as amended)
PLANNING AND DEVELOPMENT REGULATIONS 2001 (as amended)
ARTICLE 81**

**NOTICE PURSUANT TO ARTICLE 81, PART 8 OF THE ABOVE REGULATIONS, RELATING TO A PROPOSED
DEVELOPMENT BY DONEGAL COUNTY COUNCIL**

TAKE NOTICE that Donegal County Council proposes to carry out the development of an Enterprise and Digital Hub building (Alpha Building) in the Letterkenny Milford Municipal District as described in the schedule below.

SCHEDULE OF PROPOSED WORK

| No. | Title | Townlands | Local Office(s) For Viewing Plans |
|-----|--|-----------------------|--|
| 1 | Enterprise and Digital Hub building (Alpha Building) | Ballyraine Gortlee | Letterkenny Public Services Centre, Neil T Blaney Road, Letterkenny, Co. Donegal F92 TNY3 and Donegal County Council, County House, Lifford, Co. Donegal F93 Y622 |

Description and Extents

Donegal County Council proposes to carry out the following works;

Development of a new three storey enterprise and digital hub facility with a total floor area of 1640m² located within the Letterkenny Enterprise Quarter Site to facilitate a range of business establishments and expansion opportunities.

Associated ancillary works to include site drainage, parking, connection to the public water supply and other services, landscaping, appropriate boundary treatment, development related signage, connection & discharge to the public sewerage network.

All associated ancillary site works shall be located within the townlands of Ballyraine^{TD} and Gortlee^{TD} in the Letterkenny Milford Municipal District.

Note that in accordance with Article 120(1) (b) (i) of the Planning and Development Regulations 2001 (as amended) Donegal County Council has concluded, based on a preliminary examination of the nature, size and location of the development, that the Environmental Impact Assessment Report (EIAR) is not required.

The plans and particulars of this proposed development will be available for inspection (or purchase at a fee not exceeding the reasonable cost of making a copy,) at

| Location | Address | Opening Hours |
|--|--|--|
| The Planning Department/Reception, Donegal County Council | County House, Lifford, Co. Donegal F93 Y622 | 9.00am-12.30pm and 1.00pm-5.00pm from Monday to Thursday and from 9.00am-12.30pm and 1.00pm-4.30pm on Fridays |
| Letterkenny Public Services Centre | Neil T Blaney Road, Letterkenny, Co. Donegal F92 TNY3 | |

The proposed plans will be available for inspection from Friday 02nd August 2019 – Monday 02nd September 2019.

Submissions and observations with respect to the proposed development, dealing with the proper planning and development of the area in which the development is situated may be made in writing to The Co. Secretariat, Donegal County Council, Lifford, County Donegal, before 4.30pm on Monday 16th Sept 2019.

Please mark the front of the envelope with the project name as per the above schedule.

Signed: Garry Martin, Director of Services,

**Economic Development, Information Systems & Emergency Services, Donegal County Council,
County House, Lifford.**

**Appendix B – Proposed Enterprise & Digital Hub Building (Alpha Building)
Site Specific Flood Risk Assessment**



SITE SPECIFIC FLOOD RISK ASSESSMENT

**PROPOSED ALPHA BUILDING AT NEIL T BLANEY ROAD,
LETTERKENNY, CO DONEGAL**

JULY 2019



CHARTERED CIVIL ENGINEERS

LISBURN OFFICE: 93 Hillsborough Road, Lisburn, Co Antrim, BT28 1JN | Mobile +44 (0)75 6425 5696 | Email: phil@floodriskconsulting.com | Web: www.floodriskconsulting.com
DUBLIN OFFICE: Office 29, Fitzwilliam Street Lower, Dublin 2 | Mobile +353 (0)83 983 1782 | Email: phil@floodriskconsulting.ie | Web: www.floodriskconsulting.ie



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1.0 INTRODUCTION

- 1.1 This report has been prepared by Flood Risk Consulting. The brief for the study was to carry out a site specific Flood Risk Assessment (SSFRA), in regulation with The Planning System and Flood Risk Management: Guidelines for Planning Authorities (OPW, 2009) for the proposed Enterprise and Digital Hub Building (Alpha Building) at Neil T Blaney Road, Letterkenny.
- 1.2 The extent of the proposed works consists of the development of a new three storey enterprise and digital hub facility with a total floor area of 1640m² and associated ancillary works to include car parking and landscaping.
- 1.3 This SSFRA will seek to address the flood zone of the proposed development.
- 1.4 It should be noted that there are no circumstances in which the risk of flooding can be removed entirely. This report should not be considered a guarantee against future flooding events but instead aiming to evaluate the risk of flooding at the site and then propose mitigation measures that may reduce the impact of such flooding.
- 1.5 The content of this report is © of Flood Risk Consulting 2019. Every care has been taken to ensure the accuracy of this report at the time of its preparation. Flood Risk Consulting accepts no responsibility for any documents or information supplied to Flood Risk Consulting by others. It is expressly stated that no independent verification of any documents or information supplied by others has been made.
- 1.6 Flood Risk Consulting has used reasonable care, skill and diligence in compiling this report and no warranty is provided as to the report's accuracy. This document has been prepared solely for the person who commissioned the report. Flood Risk Consulting accepts no responsibility or liability for any use that is made of this document other than by the commissioner of the report for the planning purpose for which it was originally commissioned and prepared.

2.0 DESCRIPTION OF SITE

2.1 Plate 2.1 presents mapping of the proposed site (identified as a red icon on Google Maps) relative to Donegal town, Ballybofey and Kilmacrenan.



Plate 2.1: Mapping showing the location of the proposed site

2.2 Plate 2.2 presents lower scale mapping of the site relative to Letterkenny, where the site can be seen to be located in an urban area south east of Letterkenny town centre.

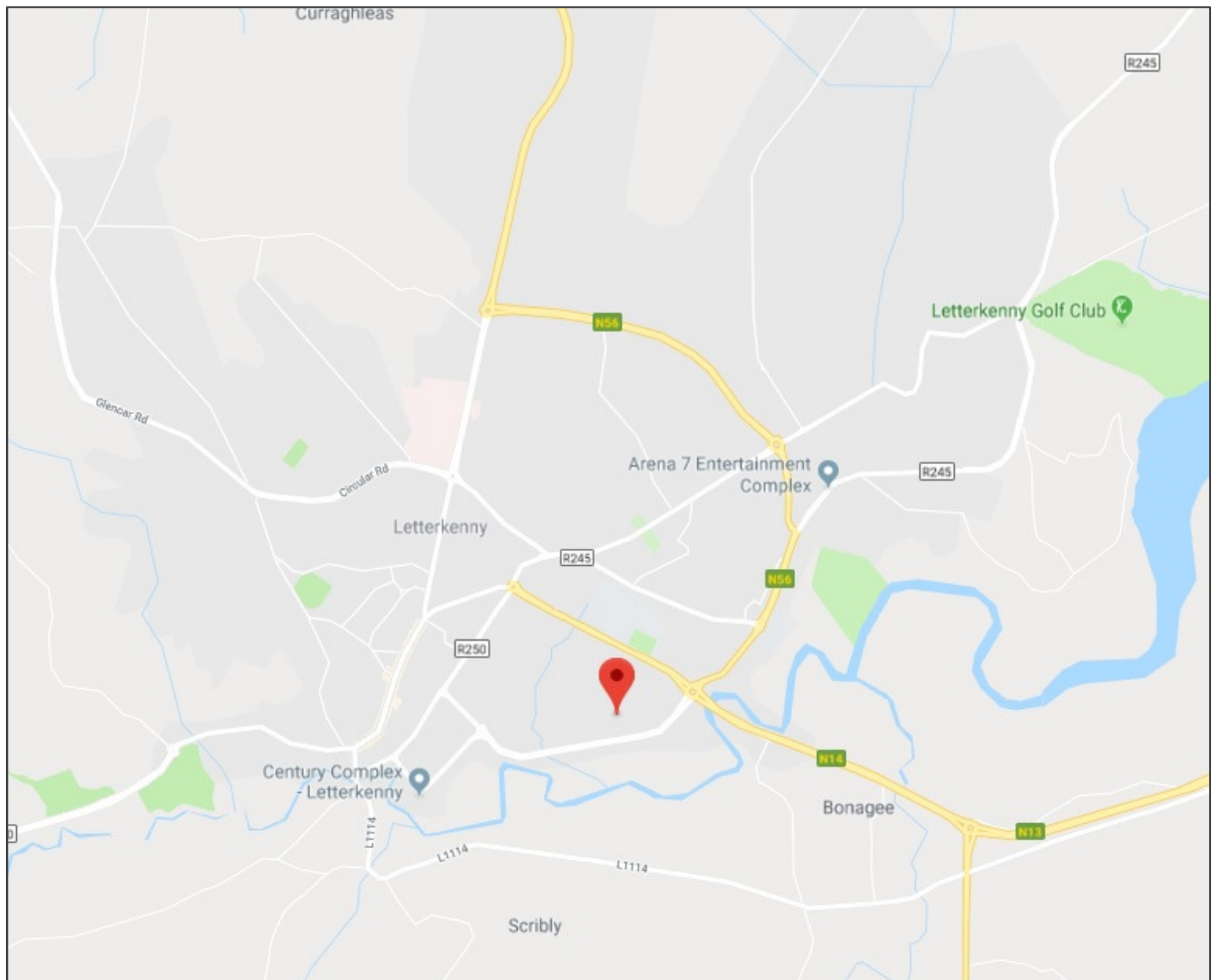


Plate 2.2: Location of the proposed site relative to Letterkenny

2.3 Plate 2.3 presents a site location map, with the proposed site identified by the red line. The site is bounded by the Neil T Blaney Road along its southern boundary. Plate 2.3 presents the layout of the proposed development, which consists of one building with public external space in the southern portion of the site, car parking in the central portion of the site and an open space landscaped area in the north portion of the site.



Plate 2.3: Site location map

2.4 Plate 2.4 presents mapping of the area with the proposed site approximately identified in red. The proposed site is located along the northern boundary of the R250 Neil T Blaney Road. One watercourse is visible flowing along part of the northern boundary of the site, with a second watercourse encroaching through the southern section of the site. Existing buildings are located north west, north east and east of the site.



Plate 2.4: Mapping of the proposed site

2.5 Plate 2.5 presents historic Ordnance Survey mapping of the area, again with the site approximately identified in red. The plate confirms the historic route of the open watercourse that presently flows through the southern section of the site once flowed south of the site. It is therefore assumed that the original route of the watercourse was artificially diverted to flow through the southern portion of the site as part of the construction work for the Neil T Blaney Road. This watercourse appears to be the main watercourse that affects the site, with the watercourse that flows along the northern boundary of the site having a much smaller catchment area and so resembling local field drainage.

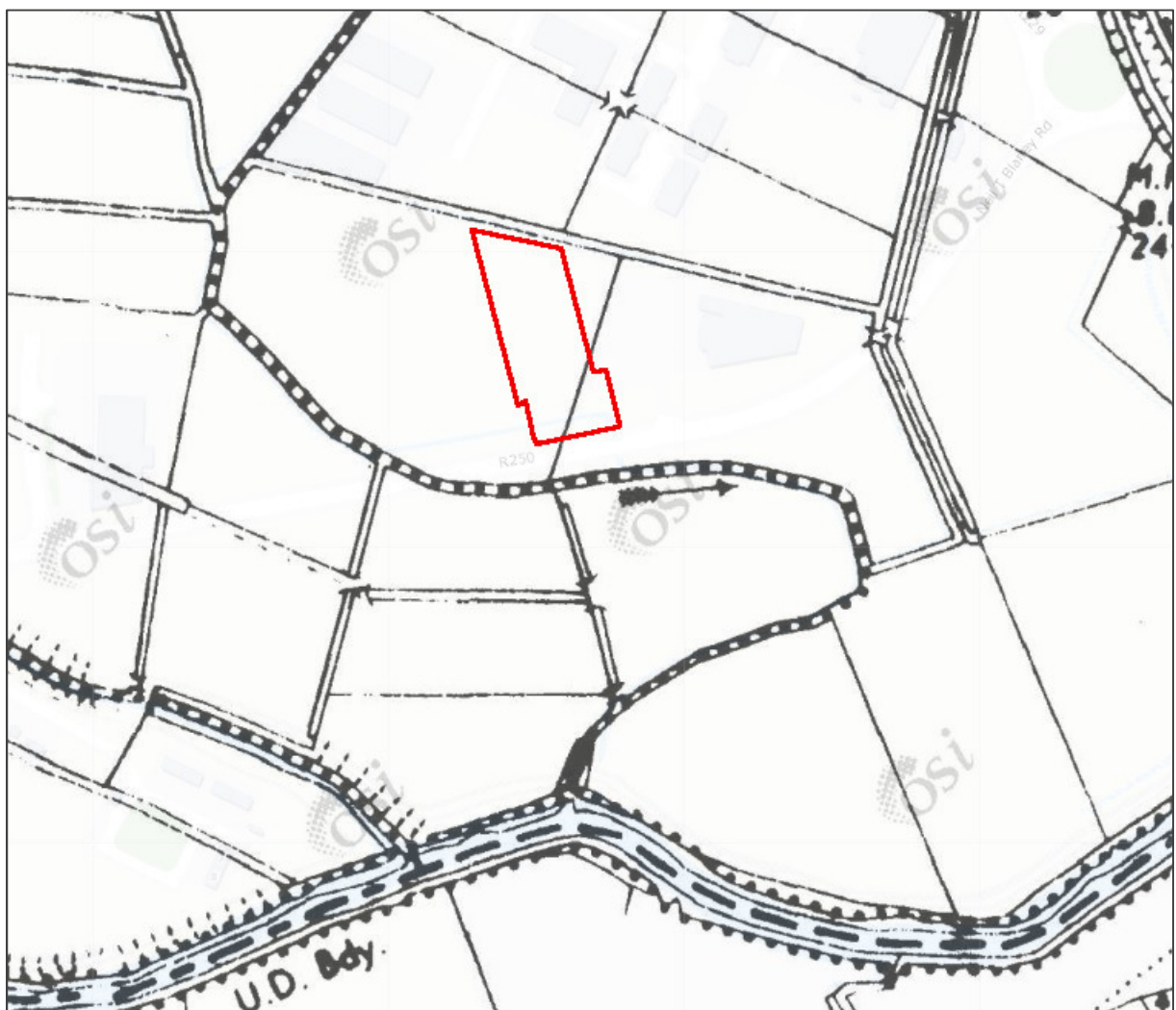


Plate 2.5: Historic Ordnance Survey mapping of the proposed site

2.6 Plate 2.6 presents aerial photography of the proposed site. The proposed site presently consists of undeveloped land. The dark line that passes through the northern portion of the site is a shadow for the higher ground located within the southern portion of the site. Based on the shape of this higher ground both within and west of the site, it is assumed that artificial infilling of land has occurred north of the Neil T Blaney Road. The open watercourse is visible downstream of the site on the southern side of the Neil T Blaney Road, suggesting that it has been culverted through the proposed site, possibly before the artificial infilling occurred.



Plate 2.6: Aerial photography of the proposed site

2.7 Plates 2.7 and 2.8 present Google Street View images of the proposed site from the Neil T Blaney Road in 2011 and 2018 respectively. Both images show that the southern portion of the proposed site has been infilled relative to the Neil T Blaney Road and existing car park immediately east of the site.



Plates 2.7 and 2.8: Google Street View image of the proposed site

3.0 INFORMATION FROM FLOOD MAPS

3.1 Plate 3.1 presents the fluvial flood extents map for the site (approximately identified in red). This map suggests that the infilled southern portion of the site is located above the 1000 year fluvial flood plain, but that the northern portion of the site is located within the 10 year, 100 year and 1000 year fluvial floodplains.

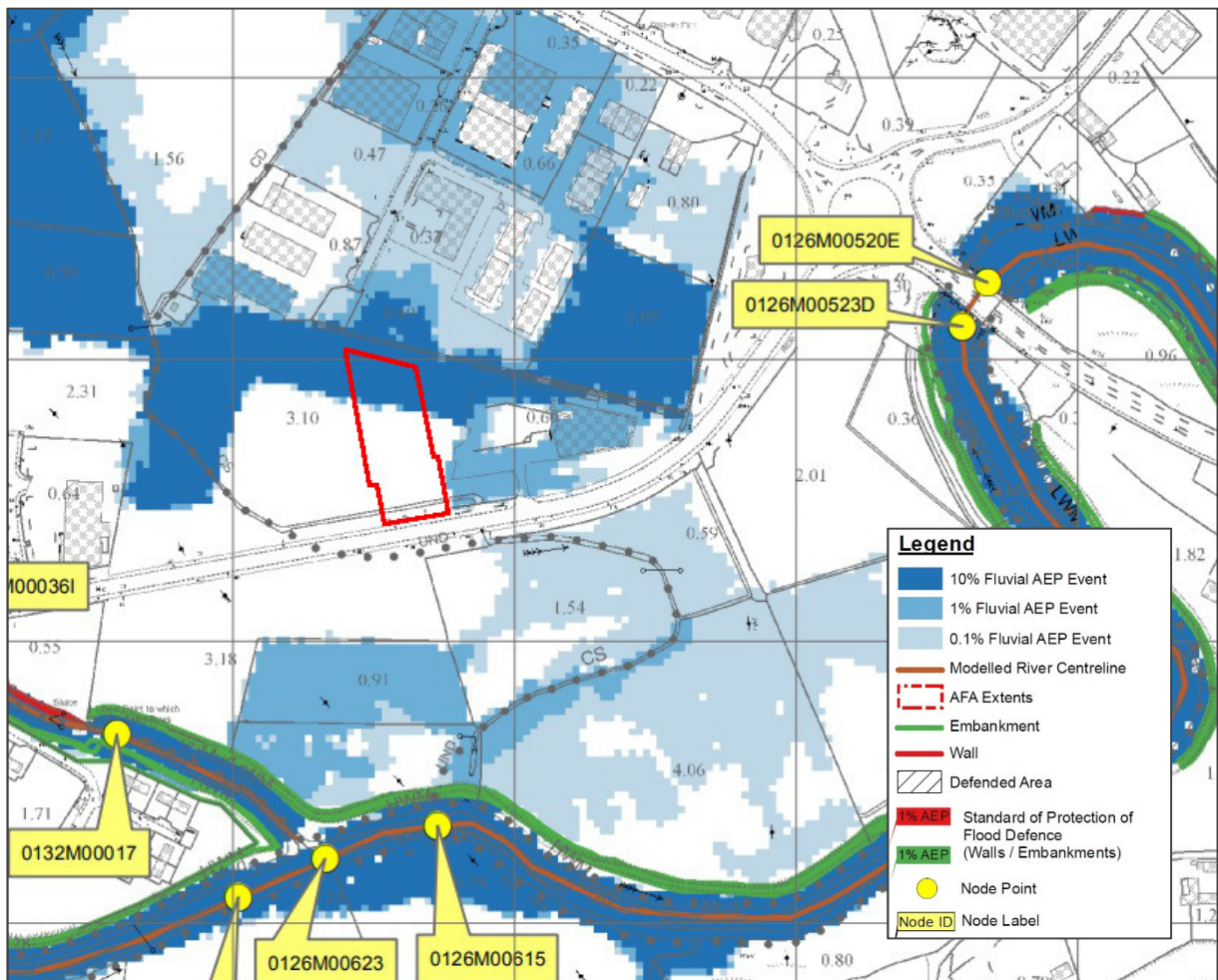


Plate 3.1: Fluvial flood extents at the proposed site



3.2 Table 3.1 presents the predicted fluvial flood levels at the yellow dots west (0132M00036I) and south (0126M00615) the site respectively.

| Location | 10 year flood | 100 year flood | 1,000 year flood |
|-------------|---------------|----------------|------------------|
| 0132M00036I | 3.39m OD | 3.53m OD | 3.60m OD |
| 0126M00615 | 3.36m OD | 3.50m OD | 3.58m OD |

Table 3.1: Predicted flood levels west and south of the proposed site

3.3 As the proposed site is affected by the watercourse at various locations both west and south of the proposed site, it would be reasonable to assume that the predicted fluvial flood levels at the site will be similar to the flood levels presented in Table 3.1.

3.4 Therefore the predicted 100 year and 1000 year fluvial flood levels at the proposed site will be similar to **3.50m-3.53m OD** and **3.58-3.60m OD** respectively.

3.5 Plate 3.2 presents the predicted flood depth at the proposed site during a 100 year fluvial flood event. This plate shows that the northern portion of the site is predicted to flood by up to 1m, but that the southern portion of the site is not located within the 100 year flood plain.

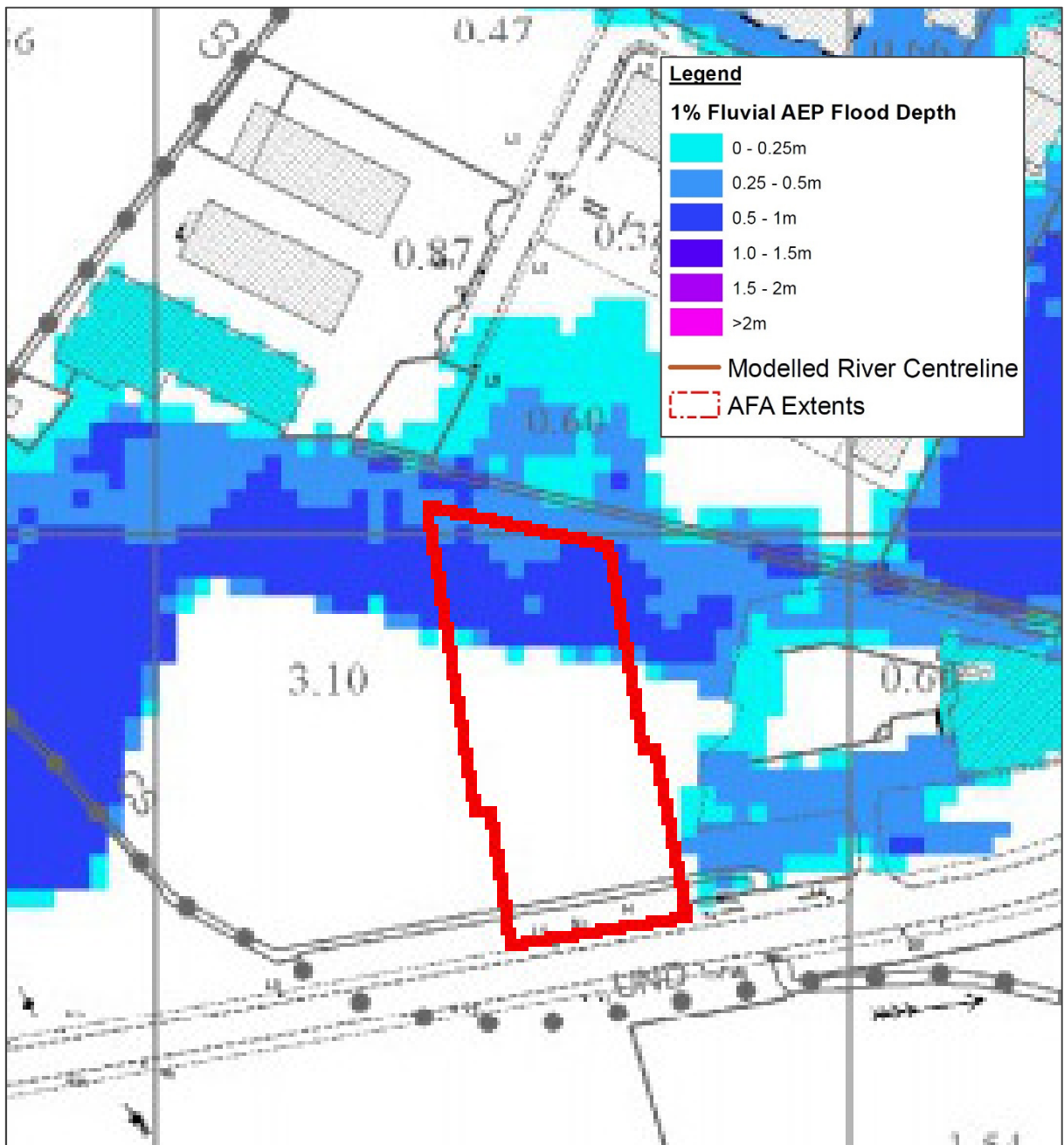


Plate 3.2: Predicted depth of flooding during a 100 year fluvial flood event

3.6 Plate 3.3 presents the predicted flood depth at the proposed site during a 1000 year fluvial flood event. This plate shows nearly all of the northern portion of the site has a predicted flood depth between 0.5m and 1m, but that the southern portion of the site is located above the predicted 1000 year fluvial flood level.

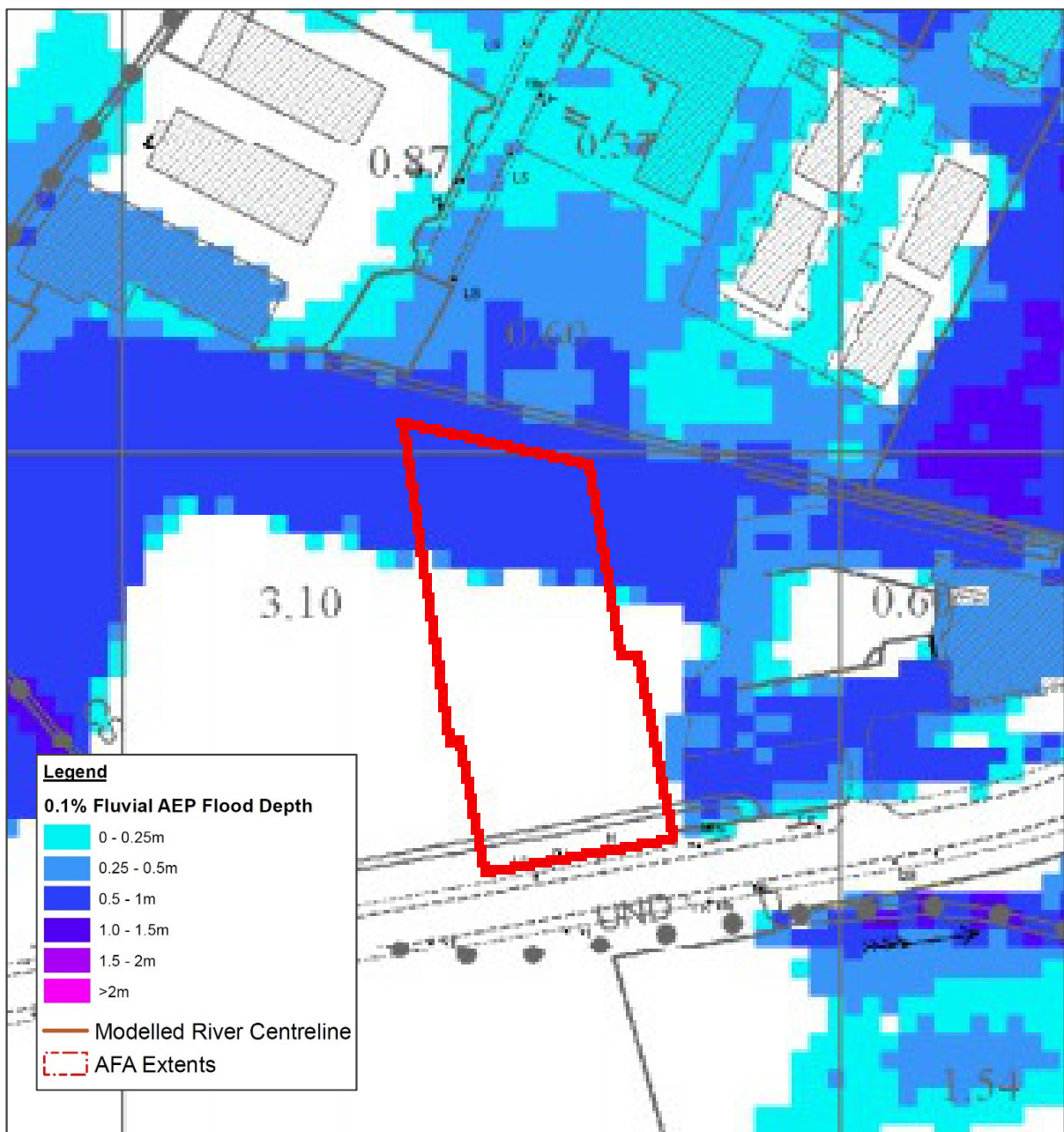


Plate 3.3: Predicted depth of flooding during a 1,000 year fluvial flood event

3.7 Plate 3.4 presents the coastal flood extents map for the site (approximately identified in red). This map suggests that the northern portion of the site will be affected by both the 200 year and 1000 year coastal flood events, but the southern portion of the site is located above the 1000 year coastal flood level.

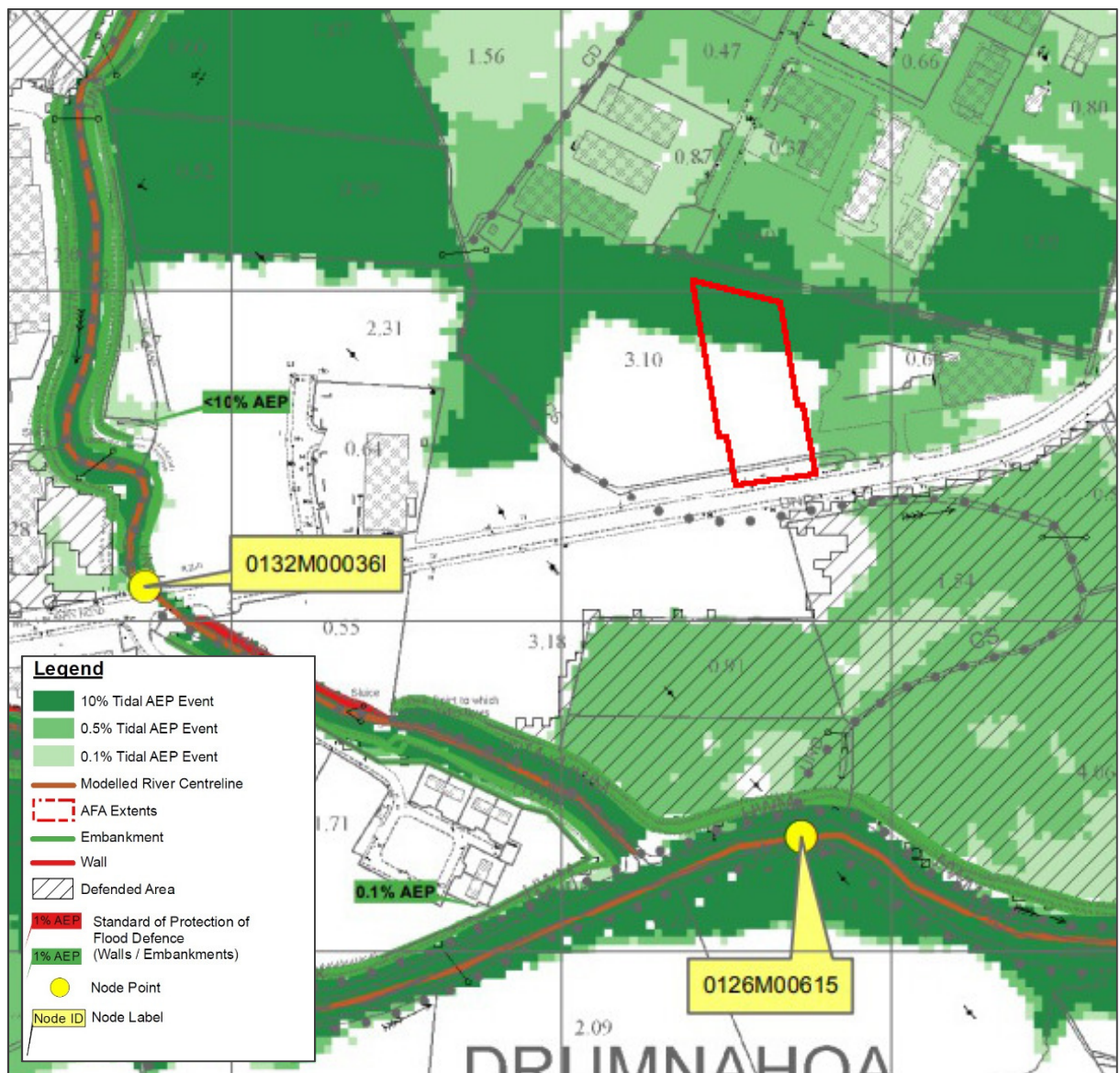


Plate 3.4: Coastal flood extents at the proposed site



3.8 Table 3.2 presents the predicted coastal flood levels at the yellow dots west (0132M00036I) and south (0126M00615) the site respectively.

| Location | 10 year flood | 200 year flood | 1,000 year flood |
|-------------|---------------|----------------|------------------|
| 0132M00036I | 3.40m OD | 3.66m OD | 3.76m OD |
| 0126M00615 | 3.39m OD | 3.68m OD | 3.83m OD |

Table 3.2: Predicted flood levels west and south of the proposed site

3.9 Again, it would be reasonable to assume that the predicted coastal flood levels at the site will be similar to the coastal flood levels presented in Table 3.2.

3.10 Therefore the predicted 200 year and 1000 year coastal flood levels at the proposed site will be similar to **3.66m-3.68m OD** and **3.76-3.83m OD** respectively.

3.11 Plate 3.5 presents the predicted flood depth at the proposed site during a 200 year coastal flood event. This plate shows that the majority of the northern portion of the site will be flooded between 0.5m and 1m but the southern portion of the site will not be flooded.

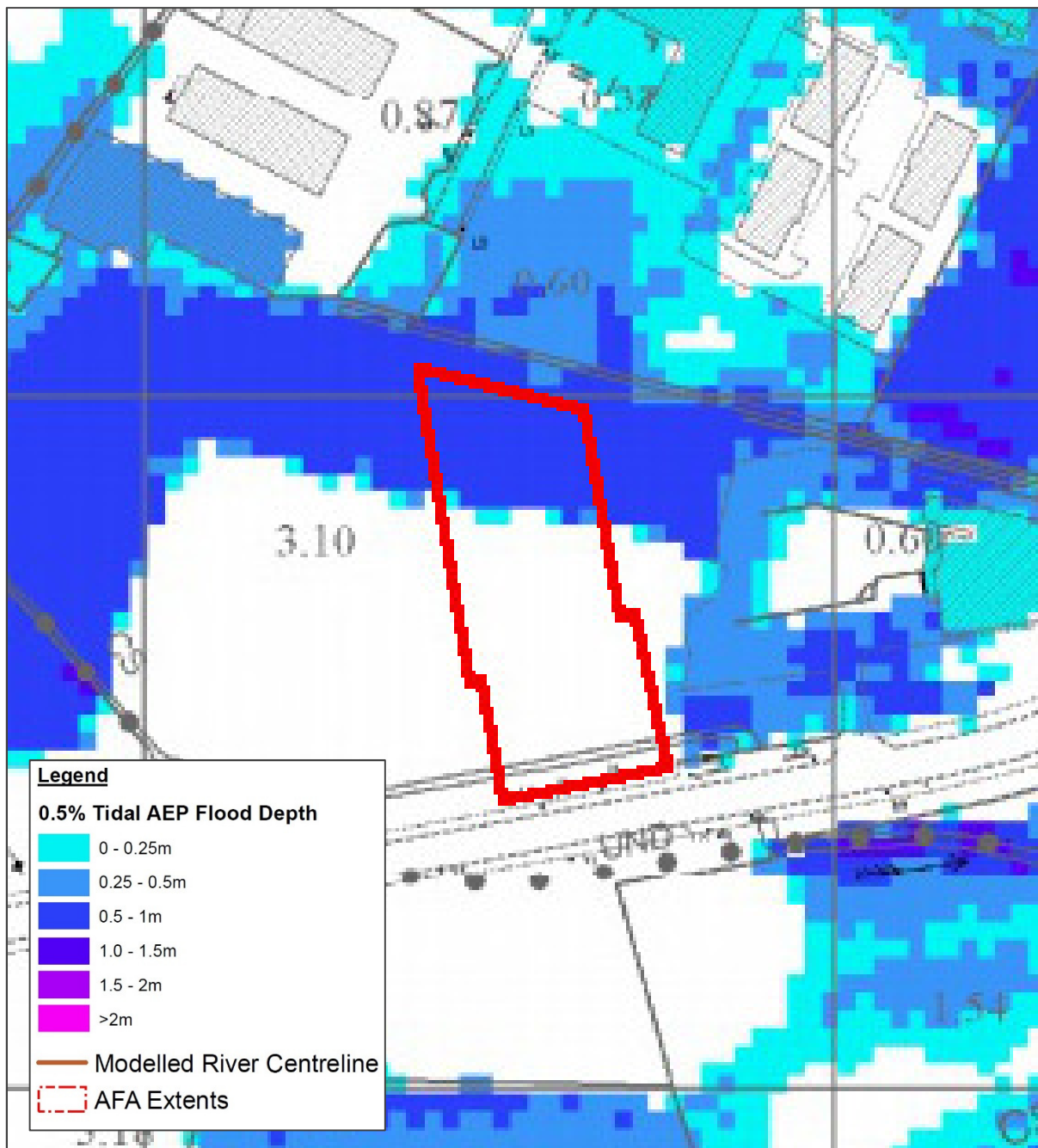


Plate 3.5: Predicted depth of flooding during a 200 year coastal flood event

3.12 Plate 3.6 presents the predicted flood depth at the proposed site during a 1000 year coastal flood event. This plate shows that the majority of the northern portion of the site is flooded between 0.5m and 1m, but that some isolated areas have a greater predicted flood depth of between 1.0m and 1.5m. The southern portion of the site is not located within the predicted 1000 year coastal floodplain.

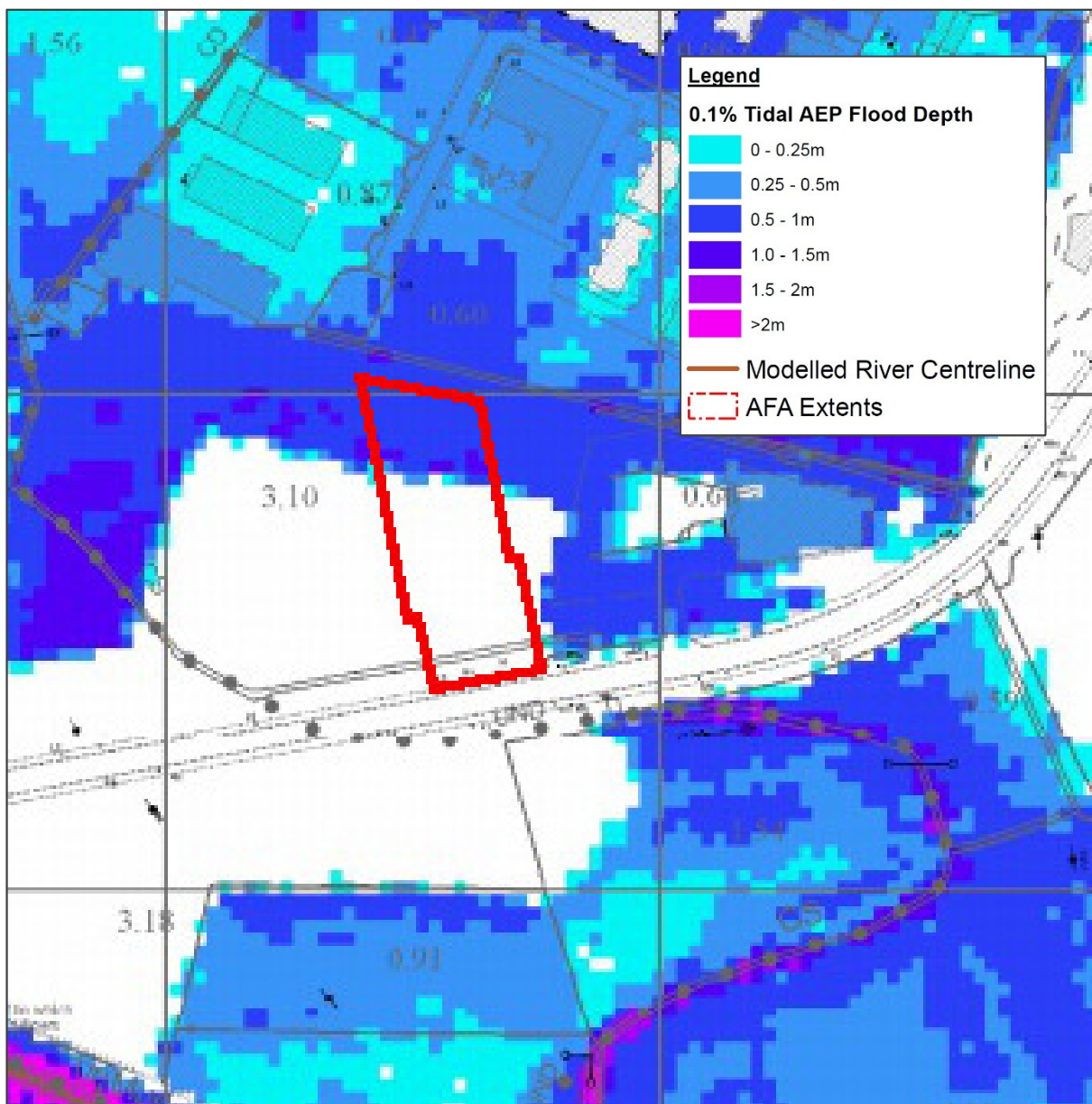


Plate 3.6: Predicted depth of flooding during a 1000 year coastal flood event



3.13 Table 3.3 presents a summary of the probable range of predicted flood levels at the site. Based on this information, coastal flooding is predicted to have a greater impact on the site than fluvial flooding. For example, the 200 year coastal flood level is predicted to be approximately 80mm higher than the 1,000 year fluvial flood level.

| Flood Event | Probable range of flood levels |
|-------------------|--------------------------------|
| 100 year fluvial | 3.50m – 3.53m OD |
| 1000 year fluvial | 3.58m – 3.60m OD |
| 200 year coastal | 3.66m – 3.68m OD |
| 1000 year coastal | 3.76m – 3.83m OD |

Table 3.3: Probable range of predicted flood levels at the site

3.14 The remainder of this report will therefore concentrate on coastal flooding, with the logic that if the building is defended against coastal flooding then it will also be defended against fluvial flooding with a similar return period.

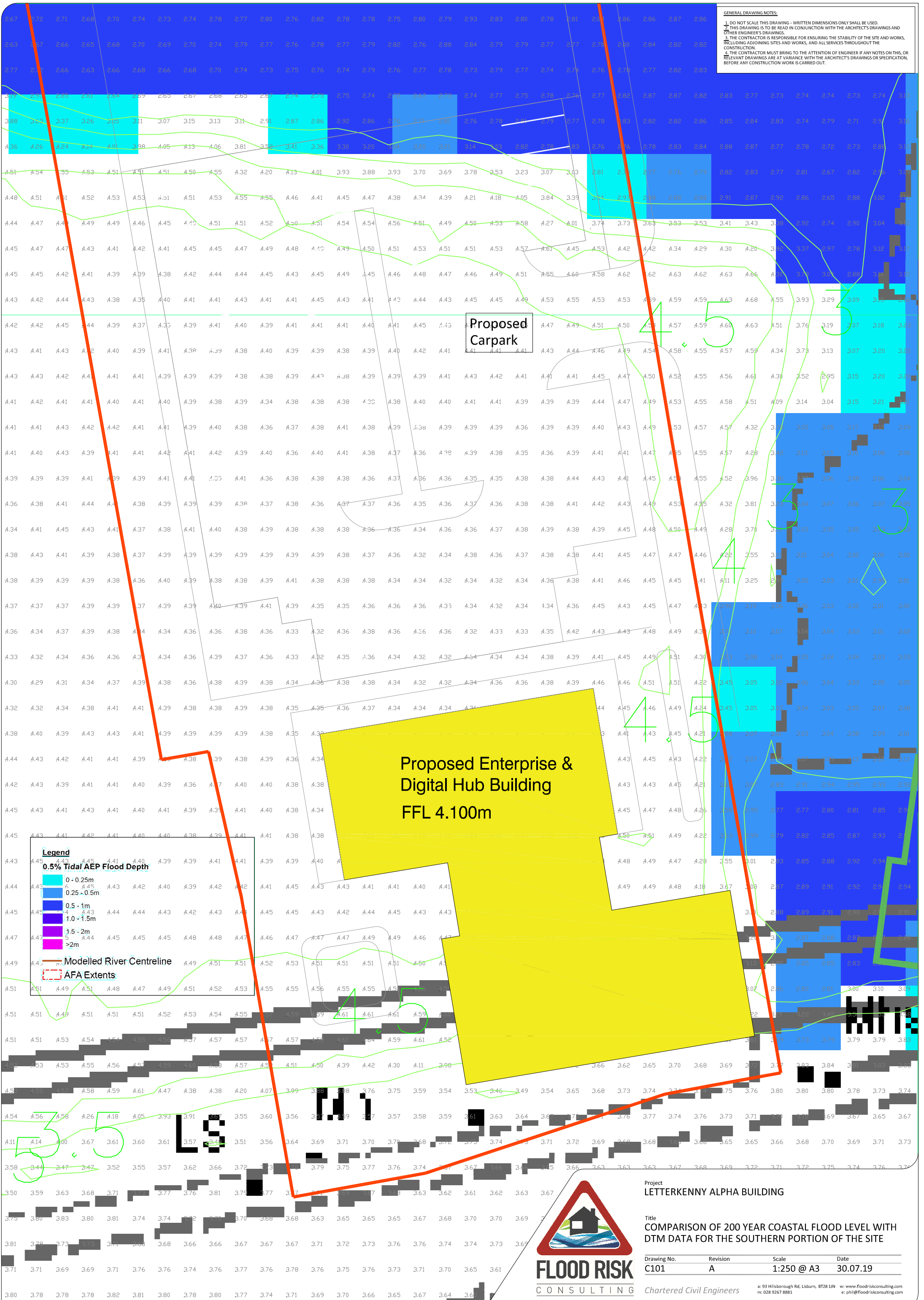


4.0 PREDICTED 200 YEAR COASTAL FLOOD LEVEL

- 4.1 Drawings C101 and C102 present a comparison between the footprint of the proposed development, the predicted 200 year coastal flood depth map and collected Lidar information. Drawing C101 concentrates on the southern portion of the site while Drawing C102 considers the northern portion of the site.
- 4.2 The cyan, light blue and dark blue hatching on the drawings identify predicted flood depths of 0-0.25m, 0.25-0.50m and 0.50-1.0m respectively.
- 4.3 By comparing Lidar levels close to the boundaries of these three colours, it is possible to predict the flood level that would cause these flood depths i.e. if the spot levels along the boundary between the 0.25-0.5m depth hatching and the 0.5-1.0m depth hatching are close to 3m OD, it is reasonable to assume the flood depth would be 3m plus 0.5m i.e. 3.5m OD. Upon undertaking this exercise, Flood Risk Consulting proposes that the predicted 200 year coastal flood level at the site is 3.65m OD. This is in very good agreement with the predicted 200 year coastal flood levels presented in Table 3.3 i.e. 3.66m to 3.68m.
- 4.4 However, as the predicted 200 year coastal flood level of 3.65m OD is slightly lower than the range of flood levels presented in Table 3.3 (3.66m to 3.68m), a conservative approach will be taken to accept the average 200 year coastal flood level in Table 3.3.
- 4.5 Therefore the predicted 200 year coastal flood level at the proposed site is **3.67m OD**.
- 4.6 Examination of Drawing C101 shows that the existing ground levels within the footprint of the proposed building range from approximately 4.3m OD to 4.6m OD. Therefore the existing ground levels at the location of the proposed building are over 600mm above the predicted 200 year coastal flood level.

GENERAL DRAWING NOTES:

- DO NOT SCALE THIS DRAWING - WRITTEN DIMENSIONS ONLY SHALL BE USED.
- THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE ARCHITECT'S DRAWINGS AND OTHER ENGINEER'S DRAWINGS.
- THE CONTRACTOR IS RESPONSIBLE FOR ENSURING THE STABILITY OF THE SITE AND WORKS, INCLUDING ADJOINING SITES AND WORKS, AND ALL SERVICES THROUGHOUT THE CONSTRUCTION.
- THE CONTRACTOR MUST BRING TO THE ATTENTION OF ENGINEER IF ANY NOTES ON THIS OR RELEVANT DRAWINGS ARE AT VARIANCE WITH THE ARCHITECT'S DRAWINGS OR SPECIFICATION, BEFORE ANY CONSTRUCTION WORK IS CARRIED OUT.



Proposed Carpark

Proposed Enterprise & Digital Hub Building
FFL 4.100m

Legend

0.5% Tidal AEP Flood Depth

- 0 - 0.25m
- 0.25 - 0.5m
- 0.5 - 1m
- 1.0 - 1.5m
- 1.5 - 2m
- >2m

Modelled River Centreline

AFA Extents



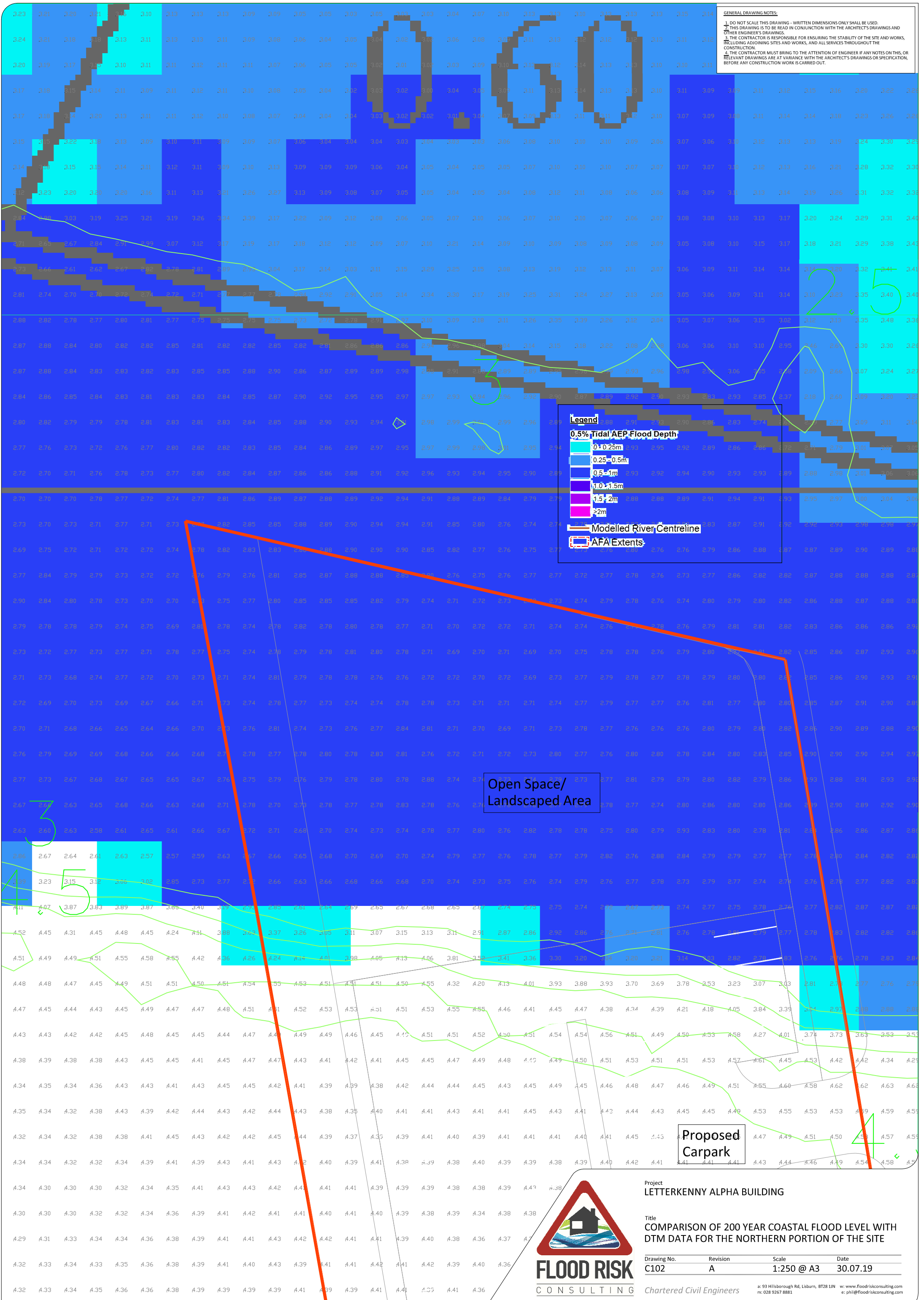
Project
LETTERKENNY ALPHA BUILDING

Title
COMPARISON OF 200 YEAR COASTAL FLOOD LEVEL WITH DTM DATA FOR THE SOUTHERN PORTION OF THE SITE

| Drawing No. | Revision | Scale | Date |
|-------------|----------|------------|----------|
| C101 | A | 1:250 @ A3 | 30.07.19 |

Chartered Civil Engineers
a: 93 Hillsborough Rd, Lisburn, BT28 1JN w: www.floodriskconsulting.com
m: 028 9267 8881 e: phil@floodriskconsulting.com

GENERAL DRAWING NOTES:
 1. DO NOT SCALE THIS DRAWING - WRITTEN DIMENSIONS ONLY SHALL BE USED.
 2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH THE ARCHITECT'S DRAWINGS AND OTHER ENGINEER'S DRAWINGS.
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 4. THE CONTRACTOR MUST BRING TO THE ATTENTION OF ENGINEER IF ANY NOTES ON THIS, OR RELEVANT DRAWINGS ARE AT VARIANCE WITH THE ARCHITECT'S DRAWINGS OR SPECIFICATION, BEFORE ANY CONSTRUCTION WORK IS CARRIED OUT.



Legend

0.5% Tidal AEP Flood Depth

- 0.1-0.25m
- 0.25-0.5m
- 0.5-1m
- 1.0-1.5m
- 1.5-2m
- >2m

Modelled River Centreline

AFA Extents

Open Space/
Landscaped Area

Proposed
Carpark



Project
LETTERKENNY ALPHA BUILDING

Title
COMPARISON OF 200 YEAR COASTAL FLOOD LEVEL WITH DTM DATA FOR THE NORTHERN PORTION OF THE SITE

| Drawing No. | Revision | Scale | Date |
|-------------|----------|------------|----------|
| C102 | A | 1:250 @ A3 | 30.07.19 |

Chartered Civil Engineers
 a: 93 Hillsborough Rd, Lisburn, BT28 1JN
 m: 028 9267 8881
 www.floodriskconsulting.com
 e: phil@floodriskconsulting.com



- 4.7 In addition, approximately 95% of the proposed car parking at the site will be located above the predicted 200 year coastal flood level of 3.67m OD, with this area of the proposed car park having an existing average ground level of approximately 4.3m OD.
- 4.8 However, the remaining 5% of the proposed car park footprint presently resides within the predicted 200 year coastal flood plain. The existing ground levels within the footprint of this section of the car park range from approximately 2.8m OD to 3.3m OD. This section of the car park would therefore need to be raised by between 100mm and 900mm in order to locate it above the predicted 200 year coastal flood level. This elevation is in good agreement with the predicted flood depths in Plate 3.5.



5.0 GUIDELINES ASSESSMENT OF THE PROPOSED DEVELOPMENT

5.1 *General*

5.1.1 This section will assess whether the proposed development satisfies the document 'The Planning System and Flood Risk Management; Guidelines for Planning Authorities (OPW, 2009)'. The above document shall be referred to within this report as the 'Guidelines'. The assessment has been undertaken by qualified professional civil engineers with experience in hydraulic engineering as required by the above document.

5.1.2 Some of the core objectives of these Guidelines are to avoid inappropriate development in areas at risk of flooding, to avoid new developments increasing flood risk elsewhere (including that which may arise from surface water runoff) and avoiding the unnecessary restriction of national, regional or local economic and social growth.

5.1.3 In achieving the aims and objectives of the Guidelines, the key principles that should be adopted should be to:

- Avoid the risk, where possible,
- Substitute less vulnerable areas, where avoidance is not possible, and
- Mitigate and manage the risk, where avoidance and substitution are not possible.

5.1.4 With reference to the last bullet point, Paragraph 1.11 of the Guidelines states that "proper planning and sustainable development may at the same time require in exceptional circumstances some development in areas of flood risk, provided that the issue of flood risk is managed properly.

5.1.5 Flood risk is a combination of the likelihood of flooding and the potential consequences arising. The Guidelines therefore recommend a staged approach to flood risk assessment that covers both the likelihood of flooding and the potential consequences.



- 5.1.6 The likelihood of flooding is normally defined as the percentage probability of a flood of a given magnitude or severity occurring. The consequences of flooding depend on the hazards associated with the flooding (e.g. depth of water, speed of flow, rate of onset, and the vulnerability of people, property and the environment potentially affected by a flood (e.g. the age profile of the population, the type of development, presence and reliability of mitigation measures etc).
- 5.1.7 A staged approach is therefore recommended within the Guidelines, carrying out only such appraisal and or assessment as is needed for the purposes of decision-making at the site-specific level. The stages of appraisal and assessment are:
- Stage 1 Flood risk identification – to identify whether there may be any flooding or surface water management issues related to the proposed site
 - Stage 2 Initial flood risk assessment – to confirm sources of flooding that may affect a proposed development site, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve preparing indicative flood zone maps. Where hydraulic models exist the potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment should be scoped; and
 - Stage 3 Detailed flood risk assessment – to assess flood risk issues in sufficient detail and to provide a quantitative appraisal of potential flood risk to a proposed or existing development, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.
- 5.1.8 At regional level the focus will be on Stage 1 (identification of flood risk), where, in general, the need for more detailed flood risk assessments is flagged for city/country and local area plans. In order to allow this Stage 1 identification to occur, flood zones must be considered. Flood zones are geographical areas within which the likelihood of flooding is in a particular range. There are three types of levels of flood zones:



- Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding);
- Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1,000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1,000 year and 0.5% or 1 in 200 for coastal flooding);
- Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1,000 for both river and coastal flooding). Flood Zone C covers all areas of the plan which are not in zones A or B.

5.1.9 In addition to identifying the above zones, there is a great deal of uncertainty in relation to the potential effects of climate change, and therefore a precautionary approach should be adopted. An example of a precautionary approach is to ensure that floor levels are sufficient to cope with the effects of climate change over the lifetime of the development.

5.2 *Sequential approach*

5.2.1 A risk-based sequential approach is therefore required to manage flood risk. The sequential approach includes the following:

- Avoid development in areas at risk of flooding
- Inappropriate types of development that would create unacceptable risks from flooding should not be planned for or permitted
- Exceptions to the restrictions of development due to potential flood risks are provided for through the use of a Justification Test, where the planning need and the sustainable management of flood risk to an acceptable level must be demonstrated.

5.2.2 Plate 5.1 presents Fig 3.1 from The Guidelines, which sets out the broad philosophy underpinning the sequential approach.

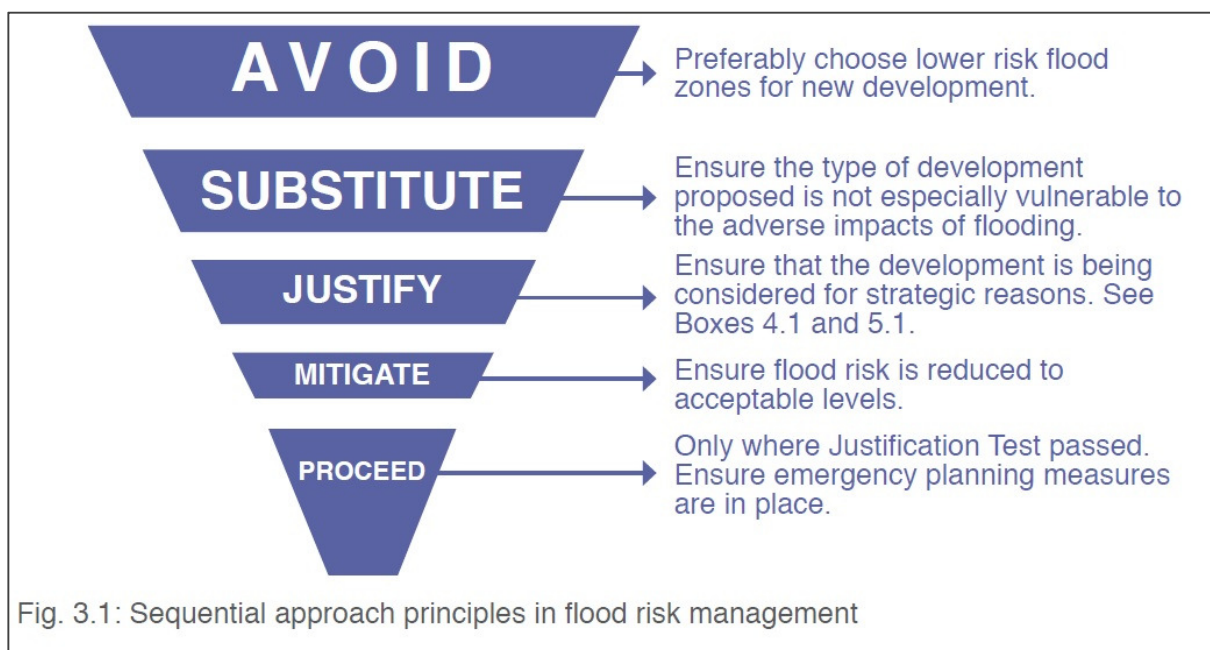


Plate 5.1: Broad philosophy underpinning the sequential approach

5.2.3 Plates 3.1 and 3.4 have identified that based on fluvial and coastal flood maps, the footprint of the proposed Alpha Building and approximately 95% of the proposed car park are located above the predicted 1000 year fluvial and 1000 year coastal flood plains. These areas of the site are therefore presently located within Zone C (lowest probability of flooding).

5.2.4 The remaining 5% of the proposed car park in the central portion of the site and the proposed open spaced landscaped area in the northern portion of the site are located within both the 100 year fluvial and 200 year coastal flood plains. These areas of the site are therefore presently located within Zone A (highest probability of flooding).

5.2.5 As part of the site is located within Zone A, the proposed development therefore has to be justified in the context of the relevant guidelines.

5.2.6 The sequential approach shall therefore be considered for the proposed development.



- 5.2.7 The Guidelines state that open space landscaped area would be considered appropriate for Zone A (high probability of flooding). Retail, commercial and industrial areas are considered appropriate in Zone B. However, highly vulnerable development, such as hospitals, residential care homes, schools and dwelling houses would be considered inappropriate in Zone B (moderate probability of flooding) unless the Justification Test can be met.
- 5.2.8 Based on the above, the Justification Test is not required for the proposed open spaced landscaped area in the north portion of the site, approximately 95% of the proposed car park in the central portion of the site nor the proposed building in the southern portion of the site. However, the Justification Test is required for approximately 5% of the proposed car park that will be located within Zone A.
- 5.2.9 The Justification Test has been designed to rigorously assess the appropriateness, or otherwise, of particular developments that are being considered in areas of moderate or high flood risk. The test is comprised of two processes; the Plan-making Justification Test and the Development Management Justification Test. The Development Management Justification Test is the process that is relevant to this FRA report, as it is used at the planning application stage where it is intended to develop land at moderate or high risk of flooding for uses or development vulnerable to flooding that would generally be inappropriate for that land.
- 5.2.10 Section 5.0 of the Guidelines states that where flood risk may be an issue for any proposed development, a site-specific FRA should quantify the risks and the effects of any necessary mitigation, together with the measures needed or proposed to manage residual risks. This site-specific FRA will therefore seek to consider mitigation measures and to manage residual risk at the proposed development.
- 5.2.11 This site-specific FRA will also undertake an assessment of potential pluvial flooding and present proposals for surface water management according to sustainable drainage principles.

5.2.12 In order for the proposed development to be considered, the planning authority must be satisfied that the development satisfies all of the criteria of the Justification Test as outlined in Box 5.1 of the Guidelines. For the reader's convenience, Plate 5.2 presents this box.

| |
|---|
| <p>Box 5.1 Justification Test for development management (to be submitted by the applicant)</p> <p>When considering proposals for development, which may be vulnerable to flooding, and that would generally be inappropriate as set out in Table 3.2, the following criteria must be satisfied:</p> <ol style="list-style-type: none"> 1. The subject lands have been zoned or otherwise designated for the particular use or form of development in an operative development plan, which has been adopted or varied taking account of these Guidelines. 2. The proposal has been subject to an appropriate flood risk assessment that demonstrates: <ol style="list-style-type: none"> (i) The development proposed will not increase flood risk elsewhere and, if practicable, will reduce overall flood risk; (ii) The development proposal includes measures to minimise flood risk to people, property, the economy and the environment as far as reasonably possible; (iii) The development proposed includes measures to ensure that residual risks to the area and/or development can be managed to an acceptable level as regards the adequacy of existing flood protection measures or the design, implementation and funding of any future flood risk management measures and provisions for emergency services access; and (iv) The development proposed addresses the above in a manner that is also compatible with the achievement of wider planning objectives in relation to development of good urban design and vibrant and active streetscapes. <p>The acceptability or otherwise of levels of residual risk should be made with consideration of the type and foreseen use of the development and the local development context.</p> <p>Note: See section 5.27 in relation to major development on zoned lands where sequential approach has not been applied in the operative development plan.</p> <p>Refer to section 5.28 in relation to minor and infill developments.</p> |
|---|

Plate 5.2: Box 5.1 of the Guidelines



5.2.13 Therefore, in order for the proposed development to pass the Justification Test, this site-specific FRA must;

1. Confirm that the subject lands have been zoned or otherwise designated for the particular use or form of development,
2. ensure that the proposed development will not increase flood risk elsewhere,
3. Include measures to minimise flood risk to people, property, the economy and the environment as far as reasonably possible
4. The development proposal addresses points 1 to 3 in a manner that is compatible with the achievement of wider planning objectives.

5.3 *Confirmation that the subject lands have been zoned for the development*

5.3.1 The proposed site is designated as Town Centre in the Donegal County Council Urban Development Framework and has been zoned for development. The site is adjacent the existing Letterkenny Public Services Centre and has good links to public Transport, cycle routes and will be adjacent the Linear Park / Greenway and future Bus corridor. The proposed scheme has been designed in accordance with the 'Letterkenny Enterprise Quarter' Masterplan objectives including activation of street frontage onto Neil T Blaney Road.

5.4 *Ensuring the proposed development will not increase flood risk elsewhere*

5.4.1 Risk to fluvial flooding elsewhere

5.4.1.1 Flood maps for the proposed building and approximately 95% of the proposed car park are located within Flood Zone C. However, the remaining 5% of the proposed car park is located within Flood Zone A. In order to construct the entirety of the proposed car park above the predicted 100 year fluvial flood level, the footprint of this section of the car park will need to be raised by between 100mm and 900mm.



5.4.1.2 With the 5% of the proposed car park covering an area of approximately 55m², this area of site would need to be filled by an average 0.5m in order to produce a car park above the 100 year flood level. This would constitute the loss of approximately 27.5m³ of available floodplain during the 100 year coastal flood event.

5.4.1.3 To put this volume into perspective, this degree of infilling will remove less than 0.005% (i.e. 1:20,000th) of the available 100 year fluvial flood plain in the area. The infilling of this small percentage of the overall floodplain will therefore have no impact on predicted fluvial or coastal flood levels in the area and will not affect existing flow paths for flood water. In addition, as the predicted fluvial flood levels are close to the predicted coastal flood levels, the majority of the predicted fluvial flooding at the site is most likely dictated by high tidal levels at the downstream end of the hydraulic model. Infilling of land affected by tidal/coastal flooding has no impact on coastal flood levels, as the floodplain effectively becomes an extension of the sea into the area and cannot therefore be raised in elevation by infilling.

5.4.1.4 Therefore the proposed raising of ground levels within the 5% of the proposed car park presently located within the floodplain will **not increase the risk of fluvial or coastal flooding elsewhere.**

5.4.2 *Risk to pluvial flooding elsewhere*

5.4.2.1 As the proposed building and car parking will increase the hardstanding area within the site, the risk of pluvial flooding elsewhere has to be considered.

5.4.2.2 Proposals for surface-water management should be applied to the development according to sustainable drainage principles to ensure that surface water runoff from the proposed development does not increase beyond that which is presently discharged from the existing site.



5.4.2.3 To address the increase in surface water runoff rates and volume, permeable paving, soakaways and/or attenuation storage with flow controls could be used within the development. The applicant should obtain appropriate discharge permissions.

5.4.2.4 Through the incorporation of SuDS, the proposed development will not have a negative impact on pluvial flooding elsewhere.

5.5 *Measures to minimise flood risk to people, property, the economy and the environment*

5.5.1 Fluvial and coastal flooding at the proposed development

5.5.1.1 It has been demonstrated earlier in the report that predicted coastal flooding is more onerous than predicted fluvial flooding at the site. Therefore, by protecting the proposed building and car parking against coastal flooding, it will also protect it against fluvial flooding.

5.5.1.2 In order to consider flood risk at the proposed development, it is important that the finished floor level (FFL) of the proposed building and finished ground levels (FGLs) for the proposed car park are located a suitable freeboard above the predicted 200 year coastal flood level at the site (3.67m OD).

5.5.1.3 A freeboard is a safety margin between the predicted flood level and the FFL to account for uncertainties in water level prediction, hydrological predictions, modelling accuracy, topographical accuracy, the quality of the digital elevation model and the unknown of future climate change.



- 5.5.1.4 Based on the predicted depth of flooding at the site and the nature of the floodplain, suitable freeboards above the predicted 1000 year coastal flood level at the site for the proposed building and proposed car park are considered to be 300mm and 150mm respectively. The freeboard for the building has been set slightly higher than the freeboard for the car park based on the more serious impact of the building being flooded compared to the car park being flooded.
- 5.5.1.5 Based on the established principle in this report that the predicted 200 year coastal flood level at the site is the average elevation of the range of 200 year coastal flood levels presented in Table 3.3, the same procedure will be adopted to determine the 1000 year coastal flood level at the site.
- 5.5.1.6 Therefore, with the range of predicted 1000 year flood levels at the site being from 3.76m to 3.83m OD, the predicted 1000 year coastal flood level at the site is 3.80m OD. To provide suitable freeboards above this level, **the minimum FFL for the proposed Alpha Building should be 4.10m OD and the minimum FGL of the proposed car park should be 3.95m OD.**
- 5.5.1.7 As the footprint of the proposed building and the majority of the footprint of the proposed car park has existing ground levels above 4.10m OD, this should be easily achievable.
- 5.5.1.8 Based on the minimum recommended building FFL and minimum car park FGLs of 4.10m OD and 3.95m OD respectively, the proposed building and car park will have a FFL and FGLs higher than the predicted 1 in 1000 year fluvial and coastal flood plains at the site.
- 5.5.1.9 However, even with this minimum proposed FFL, a precautionary approach should be taken to potential flooding of the proposed Alpha Building. Section 4.0 of Technical Appendix B of the Guidelines presents measures that could be implemented at detailed design stage for the proposed building.



5.5.1.10 For example, flood-resistant construction could be incorporated that prevents water from entering the proposed building and also mitigates the damage that floodwater could cause to the building.

5.5.1.11 The main entry points for floodwater into buildings are doors and windows (including gaps in sealant around frames), vents, air bricks and gaps around conduit or pipes passing through external building fabric. Floodwater may also arise through sanitary appliances as a result of backflow through the drainage system.

5.5.1.12 There are a range of proprietary flood protection devices available on the market that are designed specifically to resist the passage of floodwater. These include removable barriers designed to fit openings, vent covers and stoppers designed to fit WC pans.

5.5.1.13 Design for flood resilient construction should also be considered, where it is accepted that floodwater will enter buildings and provides for this in the design and specification of internal building services and finishes. These measures limit damage caused by floodwater and allow relatively quick recovery.

5.5.1.14 This can be achieved by using wall and floor materials such as ceramic tiling that can be cleaned and dried relatively easily, provided that the substrate materials (e.g. blockwork) are also resilient. Electrics, appliances and kitchen fittings may also be raised above floor level, and one-way valves may be incorporated into drainage pipes.

5.5.1.15 In addition to considering physical design issues, planning and assessing new development must take account of the need for effective emergency response planning for flood events in areas of new development. This is normally the responsibility of the developer.



5.5.1.16 Key elements are:

- Provision of flood warnings, evacuation plans and ensuring public awareness of flood risks to people where they live and work
- Awareness of risks and evacuation procedures and the need for family flood plans.

5.5.1.17 In general, flood escape routes should be kept to publicly accessible land, as safeguarding escape routes located within private property may be problematic.

5.5.1.18 Further and more detailed guidance and advice can be found at <http://www.flooding.ie> and in the Building Regulations.

5.5.1.19 In addition, “Improving the Flood Performances of New Buildings” published by the Department of Communities and Local Government in the UK is a valuable resource. In addition, a full technical report prepared for the Association of British Insurers and the Building Research Establishment on Flood Resilient Homes can be downloaded from the ABI website (<http://www.abi.org>). The British Standards Institute (BSI) has introduced a “Kitemark” Certification Scheme for flood resilient products, and CIRIA has published a number of documents detailing flood-protection products for their homes. These can be downloaded from the CIRIA website (<http://www.ciria.org>).

5.5.1.20 Finally, it is recommended that the proposed open space landscaped area in the north portion of the site be prepared at **existing ground levels**. This will require some ramping down of ground levels from the proposed car park minimum recommended elevation of 3.95m OD.

5.5.2 Pluvial flooding at the proposed development

5.5.2.1 The Guidelines state that a site-specific FRA should not only consider fluvial and coastal risk at the proposed development, but also consider risks of flooding such as exceedance.



- 5.5.2.2 Exceedance conditions result in above ground flood flow occurring either when the capacity of the drainage system is exceeded and/or where the rate of runoff exceeds the inlet capacity of the drain. Without good design, flood flow will follow default pathways and this can lead to indiscriminate flooding of property. It is possible to avoid this by identifying and designing above ground flood routes.
- 5.5.2.3 With the above in mind, this report shall consider at a preliminary level exceedance of the proposed surface water infrastructure from the proposed building and car park.
- 5.5.2.4 The client may wish to have detailed design undertaken in the future to ensure that no flooding of property will occur as a result of a 100 year pluvial storm event.
- 5.5.2.5 The primary risk is that the proposed surface water infrastructure cannot cope with a 100 year rainfall event and so surcharge adjacent to the proposed building.
- 5.5.2.6 Examination of Drawing C101 shows that the existing road levels along the Neil T Blaney Road will be lower than the FFL of the proposed building. Therefore any exceedance water from surface water infrastructure surrounding the proposed building is anticipated to flow southward towards the Neil T Blaney Road.
- 5.5.2.7 The above preliminary design consideration of an exceedance event has therefore shown that the layout of the proposed development does not need to be revised if the appropriate mitigation measures are employed. However, based on general exceedance principles, the FFL of the proposed building should be at least 150mm above the adjacent ground levels in the proposed public external space surrounding the building to ensure that exceedance flow would require a depth of at least 150mm before entering the proposed building.



- 5.6 *The development proposal address points 1 to 3 in a manner that is compatible with the achievement of wider planning objectives*
- 5.6.1 The existing industrial/commercial use for the site is well established and development of the proposed Alpha Building and associated ancillary works is compatible and appropriate with the zoning.



6.0 CONCLUSIONS

- 6.1 The primary objective of the study was to carry out a site specific Flood Risk Assessment (FRA) in regulation with The Planning System and Flood Risk Management: Guidelines for Planning Authorities (OPW, 2009) for the proposed Alpha building at the Neil T Blaney Road, Letterkenny.
- 6.2 The report presents the results of a detailed desk top study. The footprint of the proposed building and the majority of the proposed car park are located above both the predicted 1000 year fluvial and coastal flood plains, but approximately 5% of the proposed car park is indicated by fluvial and coastal flood maps as being subject to flooding during both a 100 fluvial flood event and a 200 year coastal flood event.
- 6.3 As approximately 5% of the proposed car park is located within both these flood plains (Zone A), a sequential approach was undertaken to ensure that the proposed development will not increase flood risk elsewhere and to include measures to minimise flood risk to people, property, the economy and the environment as far as reasonably possible.
- 6.4 A comparison of the predicted 200 and 1000 year coastal flood levels at the site (3.67m OD and 3.80m OD) with a **minimum proposed building FFL of 4.10m OD** and a **minimum proposed car park FGL of 3.95m OD** ensures that the proposed building and car park will be located **above** the predicted 1000 year fluvial and coastal flood plains.
- 6.5 The area of flood plain that needs to be infilled in order to raise the remaining 5% of the proposed car park out of the predicted floodplain would represent approximately 0.005% i.e. 1/20,000th of the predicted floodplain volume in the area. As much of this predicted flooding is most likely caused by tidal flooding, the infilling of approximately 1/20,000th of the floodplain will have no impact on predicted flooding or the flow path of flood waters in the area. Therefore the proposed development will **not increase the risk of fluvial flooding elsewhere**.



- 6.6 As the proposed development will increase the hardstanding area at the site, appropriate SuDS measures should be employed to ensure that surface water discharge from the developed site does not exceed existing discharge rates. This will ensure that the proposed development will not increase pluvial flood risk elsewhere.
- 6.7 To ensure that the proposed development minimises flood risk to people, property, the economy and the environment, a precautionary approach should be taken to potential flooding of the proposed building and so Section 4.0 of the Technical Appendix B of the Guidelines presents measures should be considered at detailed design stage for the proposed development.
- 6.8 Finally, the proposed open space landscaped area in the northern portion of the site should be constructed at existing ground levels.

Dr Philip Hull PhD BEng BTh CEng MICE MIEI

Director for Flood Risk Consulting Limited

Appendix C – EIA Pre-Screening Report

STAGE 1.a – EIA PRE-SCREENING

| Case Ref: | | | |
|---|---|--|---|
| Development Summary | | Development of a new three storey enterprise and digital hub facility with a total floor area of 1640m ² located within the Letterkenny Enterprise Quarter Site to facilitate a range of business establishments and expansion opportunities. Associated ancillary works to include site drainage, parking, connection to the public water supply and other services, landscaping, appropriate boundary treatment, development related signage, connection & discharge to the public sewerage network. | |
| Does the proposed development constitute an EIA project? (that is involving construction works or interventions in the natural surroundings) | | Yes | <input checked="" type="checkbox"/> |
| | | No | <input type="checkbox"/> |
| If YES, Does the proposed development fall within a class of development set out in Part 1 or Part 2, Schedule 5 of the Planning and Development Regulations, 2001 (as amended)? | | | |
| Tick | Threshold | Comment | Result |
| Yes | | | |
| *No | <input checked="" type="checkbox"/> N/A | N/A | Development is not prescribed in Schedule 5 of the PDR, 2001 (as amended) |

* If 'No' is ticked in the box above, there is no requirement to complete Stage 1.b – EIA Screening – Preliminary Examination (next page)

| CONCLUSION | |
|--|---|
| Development is not within Part 1 or Part 2, Schedule 5. No EIA/Screening is required. | As the development is not prescribed in Schedule 5 of the said regulations, there is no requirement to proceed to sub-threshold EIA preliminary examination |
| Development is within Part 1 or Part 2 and is greater than, equal to, or there is no threshold. EIAR is required. | N/A |
| Development is within Part 1 or Part 2 but is less than threshold. EIA Screening is Required. | N/A |

Case Officer: Shawn P. Murphy Date 01.09.19

**Appendix D – Appropriate Assessment (AA) Screening - Habitats Directive Article 6
Screening Assessment**

Appropriate Assessment (AA) Screening of Enterprise and Digital Hub building (Alpha Building) at Ballyraine in the Letterkenny Milford Municipal District

**In Line with the Requirements of Article 6 (3) Of the EU
Habitats Directive**



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

Economic Development, Information Systems & Emergency Services

August 2019

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Appendix A: Natura 2000 Sites Relevant to this Appropriate Assessment

Appendix B: Impact Assessment Screening Matrix for proposed Enterprise and Digital Hub Building (Alpha Building)

1 Introduction

1.1 Background

Donegal County Council is proposing to carry out a local authority own development in accordance with the provisions of Part XI of the Planning and Development Act 2000 (as amended) and Part 8 of the Planning and Development Regulations 2001 (as amended) for *inter alia* a new three storey Enterprise and Digital Hub building (Alpha Building) in Letterkenny, Co. Donegal. This document comprises the Appropriate Assessment Screening of the proposed development in accordance with the requirements of Article 6(3) of the EU Habitats Directive (92/443/EEC).

The purpose of the screening exercise is to determine whether the proposed development could have significant effects on the Natura 2000 network of European sites (commonly known as Natura 2000 sites) within the zone of influence of the proposed development (within 15km of the development boundary), either alone or in combination with other plans or projects, and consider whether these impacts are likely to be significant. Natura 2000 sites are protected habitats for flora and fauna of European importance and comprise Special Areas of Conservation (SACs) designated under the EU Habitats Directive (92/43/EEC) and Special Protection Areas (SPAs) designated under the Birds Directive (79/409/EEC).

1.2 Legislative Context

1.2.1 Habitats Directive and Appropriate Assessment

The aim of the EU Habitats Directive (92/443/EEC) is to promote the maintenance of biodiversity, taking account of economic, social, cultural and regional requirements. The Directive recognises that in the European territory of the Member States, natural habitats are continuing to deteriorate and an increasing number of wild species are seriously threatened. In order to ensure the restoration or maintenance of natural habitats and species of Community interest at a favourable conservation status, it is necessary for Member States to designate special areas of conservation in order to create a coherent European ecological network. Criteria for site designation are set out in the Directive. The network of sites is referred to as Natura 2000 and includes SACs (including candidate SACs) and SPAs (including proposed SPAs).

The Natura 2000 network of European sites is comprised of sites of highest biodiversity importance for rare and threatened habitats and species across the EU. SACs are selected for the conservation of habitats listed in Annex I of the Habitats Directive, and for species of animals (other than birds) and plants listed in Annex II. SPAs are selected for the conservation of birds listed in Annex I of the Birds Directive (Directive 2009/147/EC of the European Parliament and of the Council of 30 November 2009 on the conservation of wild birds (codified version of Council Directive 79/409/EEC as amended)) and other regularly occurring migratory birds and their habitats. The annexed habitats and species for which each site has been selected are the qualifying interests of the sites, and the conservation objectives of the site are based on these qualifying interests.

Crucially, the Habitats Directive requires that an AA must be made of any plan or programme that is likely to have a significant effect on the conservation objectives of designated sites i.e. on SACs or SPAs, before any decision can be made to allow that plan or project to proceed. Article 6(3) of the Habitats Directive states that:

"Any plan or project not directly connected with or necessary to the management of the [Natura 2000] site but likely to have a significant effect thereon, either individually

or in combination with other plans or projects, shall be subjected to an appropriate assessment of its implications for the site in view of the site's conservation objectives. In light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public."

In the event that an assessment determines that there is a likelihood of an adverse affect, Article 6(4) makes provision for a plan or project to proceed under certain restricted circumstances. Article 6(4) states that:

"If, in spite of a negative assessment of the implications for the site and in the absence of alternative solutions, a plan or project must nevertheless be carried out for imperative reasons of overriding public interest, including those of a social or economic nature, Member States shall take all compensatory measures necessary to ensure that the overall coherence of the Natura 2000 is protected. It shall inform the Commission of the compensatory measures adopted.

Where the site concerned hosts a priority natural habitat type and/or a priority species the only considerations which may be raised are those relating to human health or public safety, to the beneficial consequences of primary importance for the environment or, further to an opinion from the Commission, to other imperative reasons of overriding public interest."

The application of AA in Ireland, as required by the Habitats Directive, is primarily governed by the European Communities (Birds and Natural Habitats) Regulations 2011 (S.I. No. 477 of 2011 as amended by S.I. No. 355 of 2015), and the Planning and Development (Amendment) Act 2010 (Part XAB), as amended by the Environment (Miscellaneous Provisions) Act 2011. A range of guidance on carrying out appropriate assessment, and interpretation of relevant legislation is available including *inter alia*:

- Appropriate Assessment of Plans and Projects in Ireland - Guidance for Planning Authorities. Department of Environment, Heritage and Local Government, 2009.
- Managing Natura 2000 Sites: The Provision of Article 6 of the Habitats Directive 92/43/EEC. European Commission, 2000.
- 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, 2002.
- Guidance Document on Article 6 (4) of the 'Habitats Directive' 92/43/EEC. Clarification of the Concepts of Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence. Opinion of the European Commission. European Commission, 2007 / 2012.
- Nature and biodiversity cases: Ruling of the European Court of Justice. European Commission. 2006.
- *Habitats Directive and environmental assessment of plans and projects*. García Ureta, A. Journal for European Environmental and Planning Law 2, 84-96, 2007.
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPW 1/10 & PSSP 2/10.
- Compliance Conditions in respect of Developments requiring (1) Environmental Impact Assessment (EIA); or (2) having potential impacts on Natura 2000 sites. Circular letter PD 2/07, NPWS 1/07
- *Compliance of Existing Land Use Plans with the EU Habitats Directive*. Department of Environment, Heritage and Local Government (2011) Circular Letter PSSP 5/2011.

1.2.2 The Process of Appropriate Assessment

While there is no prescribed method for undertaking Appropriate Assessment (AA), or form or content for reporting, methodological guidance promotes a four-stage process to complete the AA. The requirements for individual stages are summarised in Table 1.1. An important aspect of the AA process is that the outcome at each successive stage determines whether a further stage in the process is required. Stages 1 and 2 relate to Article 6(3) of the Habitats Directive and are concerned with the strict protection of sites; Stages 3 and 4 relate to Article 6(4) which is the procedure for allowing derogation from this strict protection in certain restricted circumstances. Ultimately the proposed development may only be carried out if the AA process reaches completion and has ascertained beyond reasonable scientific doubt that it shall not adversely affect the integrity of a European site, or in the absence of alternative solutions, imperative reasons of overriding public interest (IROPI) can be established as required under Section 177W, Part XAB, Planning and Development Act 2000 (as amended). In the latter scenario compensatory measures are required to offset any damage to the Natura 2000 network of European sites.

Table 1.1: Stages in the Process of Habitats Directive Appropriate Assessment

| Stage | Task |
|-------|---|
| 1 | <p>Screening</p> <p>Screening is the process that addresses and records the reasoning and conclusions in relation to the first two tests of Article 6(3): i) whether a plan or project is directly connected to or necessary for the management of the site, and ii) whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a Natura 2000 site in view of its conservation objectives. If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2 (AA). Screening should be undertaken without the inclusion of mitigation, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered plan. The greatest level of evidence and justification will be needed in circumstances when the process ends at screening stage on grounds of no impact.</p> |
| 2 | <p>Appropriate Assessment</p> <p>This stage considers whether the plan or project, alone or in combination with other projects or plans, will have adverse effects on the integrity of a Natura 2000 site, and includes any mitigation measures necessary to avoid, reduce or offset negative effects. The proponent of the plan or project will be required to submit a Natura Impact Report/Natura Impact Statement, i.e. the report of a targeted professional scientific examination of the plan or project and the relevant Natura 2000 sites, to identify and characterize any possible implications for the site in view of the site's conservation objectives, taking account of in combination effects. This should provide information to enable the competent authority to carry out the appropriate assessment. If the assessment is negative, i.e. adverse effects on the integrity of a site cannot be excluded, then the process must proceed to Stage 4, or the plan or project should be abandoned.</p> |
| 3 | <p>Alternative Solutions</p> <p>This stage examines any alternative solutions or options that could enable the plan or project to proceed without adverse effects on the integrity of a Natura 2000 site. The process must return to Stage 2 as alternatives will require appropriate assessment in order to proceed. Demonstrating that all reasonable alternatives have been considered and assessed, and that the least damaging option has been selected, is necessary to progress to Stage 4.</p> |

| Stage | Task |
|-------|---|
| 4 | <p>Imperative Reasons of Overriding Public Interest (IROPI)/Derogation</p> <p>Stage 4 is the main derogation process of Article 6(4) which examines whether there are imperative reasons of overriding public interest (IROPI) for allowing a plan or project that will have adverse effects on the integrity of a Natura 2000 site to proceed in cases where it has been established that no less damaging alternative solution exists.</p> <p>The extra protection measures for Annex I priority habitats come into effect when making the IROPI case. Compensatory measures must be proposed and assessed. The Commission must be informed of the compensatory measures. Compensatory measures must be practical, implementable, likely to succeed, proportionate and enforceable, and they must be approved by the Minister.</p> |

2 Screening for Appropriate Assessment

2.1 Introduction to Screening

This screening for AA, or Stage 1 of AA, has been undertaken in accordance with and having regard to the following:

- Article 6 of the Habitats Directive 92/43/EEC.
- DECLG Guidelines for Planning Authorities entitled 'Appropriate Assessment of Plans and Projects in Ireland', (Department of Environment, Heritage and Local Government, 2010 revision).
- Appropriate Assessment under Article 6 of the Habitats Directive: Guidance for Planning Authorities. Circular NPWS 1/10 & PSSP 2/10.
- Circular letter PD 2/07, NPWS 1/07 & PSSP 5 2011.
- Assessment of Plans and Projects Significantly Affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6 (3) and 6 (4) of the Habitats Directive 92/43/EEC, European Commission, 2001.
- Guidance Document on Article 6 (4) of the 'Habitats Directive' 92/43/EEC. Clarification of the Concepts of Alternative Solutions, Imperative Reasons of Overriding Public Interest, Compensatory Measures, Overall Coherence. Opinion of the European Commission (European Commission, January 2007).

This stage of the process identifies any likely significant affects to European Sites from a project or plan, either alone or in combination with other projects or plans. Screening determines whether appropriate assessment is necessary by examining:

- Whether a plan or project is directly connected to or necessary for the management of the site; and
- Whether a plan or project, alone or in combination with other plans and projects, is likely to have significant effects on a European site in view of its conservation objectives.

The European Commissions' Methodological Guidance (listed above) outlines four sub-steps within the screening exercise as follows:

1. Determining whether the project or plan is directly connected with or necessary to the management of the site;
2. Describing the project or plan and the description and characterisation of other projects or plans that in combination have the potential for having significant effects on the Natura 2000 sites;
3. Identifying the potential effects on the Natura 2000 sites;
4. Assessing the significance of any affects on the Natura 2000 sites.

If the effects are deemed to be significant, potentially significant, or uncertain, or if the screening process becomes overly complicated, then the process must proceed to Stage 2 (AA). Screening should be undertaken without the inclusion of mitigation, unless potential impacts clearly can be avoided through the modification or redesign of the plan or project, in which case the screening process is repeated on the altered development. The greatest level of evidence and justification will be needed in circumstances when the process ends at screening stage on grounds of no impact.

2.2 Is the Project or Plan Directly Connected with or Necessary to the Management of the Natura 2000 Sites?

The Methodological Guidance outlines that for a project or plan to be 'directly connected with or necessary to the management of the site', the management component must refer to management measures that are for conservation purposes, and the 'directly' element refers to measures that are solely conceived for the conservation management of a site and not direct or indirect consequences of other activities.

It can be concluded at the outset that the project is not directly connected with or necessary to the management of the Natura 2000 sites in the County.

2.3 Description of the Application Site and Environs

The subject site is located to the south-east side of Letterkenny Town Centre, within the designated Town Centre Area as identified in the Donegal County Council (DCC) Urban Design Framework for Letterkenny (County Development Plan, 2018-2024 Part C refers).

The proposed Enterprise and Digital Hub building (Alpha building) is bounded by the Neil T Blaney Road to the south, the recently approved Social Enterprise Centre (SEC) building (Part 8 Development) and the Letterkenny Public Services Centre (PSC) to the east and the (currently under construction) Joe Bonnar Road to the north and west. The route of the recently approved first phase development of a Linear Park/Greenway (Part 8 Development) is also located to the north of the proposed Alpha Building which will begin at the intersection with the new Joe Bonnar Link Road and travel in a westerly direction for a distance of 380m before terminating at Isle lane/Sprackburn. Access to the site, on completion of the Joe Bonnar Link Road project, will be via a new access. It is intended for this access to be shared by the SEC and PSC.

2.4 Description of the Proposed Development

The proposed development comprises the following:

- Development of a new three storey Enterprise and Digital Hub facility with a total floor area of 1,640m² located within the Letterkenny Enterprise Quarter Site to facilitate a range of business establishments and expansion opportunities.

Associated ancillary works to include site drainage, parking, connection to the public water supply and other services, landscaping, appropriate boundary treatment, development related signage, connection & discharge to the public sewerage network.

The proposed development and all associated ancillary works shall be located within the townlands of Ballyraire^{TD} and Gortlee^{TD} in the Letterkenny Municipal District.

2.4.1 Other Projects with Potential for In-combination Impacts

Where a plan or project is likely to have a significant effect on a European site, either alone or in combination with other plans or projects it is subject to AA. The in combination test should include completed, approved but uncompleted, or proposed (but not yet approved) plans or projects if sufficient detail is available for assessment. The consideration of cumulative effects includes the sum total of influences affecting the condition of Natura sites.

Cumulative effects are perhaps most obvious in the case of space crowding of activities that taken in isolation would be sub-threshold in terms of significance in affecting Natura sites. However, long delays between cause and effect can result in time lags for in combination effects to materialise in some instances (e.g. changes in flow regimes due to forestry or drainage). Some in combination effects may be synergistic (e.g. lower flows combined with increased pollutant loads). Other effects can be secondary in nature (e.g. windfarm road access resulting in recreational disturbance of previously inaccessible areas). In all cases a precautionary approach is taken in the assessment. In combination effects are considered and set out below.

The Joe Bonnar Link Road, located to the north and west of the subject site, and the recently approved Part 8 development comprising a Social Enterprise Centre building to the east of the subject site and first phase development of a Linear Park/Greenway located to the north of the subject site could have

in combination effects in conjunction with the proposed development, and as such are outlined below with summary comment on the nature of possible interactions.

Joe Bonnar Link Road

The Joe Bonnar Link Road which is currently under construction aims to improve urban mobility and amenities within Letterkenny via the extension of existing pedestrian walkways and cycle lanes, provision of access to development lands assisting in this development of public amenities in this area and providing a safer access/egress point from the existing Letterkenny PSC.

An Appropriate Assessment screening exercise was carried out for the Joe Bonnar Link Road project. The screening exercise concluded "*that there are no significant impacts likely to arise from Road Works on any Natura site. It is also unlikely that there will be 'in combination' negative effects from any other additional plans or developments at each of the Natura sites identified.*"

Social Enterprise Centre and Linear Park/Greenway

The recently approved three storey multi-use Social Enterprise Centre (SEC) is a building of very high architectural standard with external public amenity space, secured play area, parking and bus/coach drop off lay-by on the Neil T Blaney Road (R250). The new SEC building will act as a landmark at this strategic entry point to Letterkenny, in an area to be developed as the 'Enterprise Quarter' for the town. The SEC building sits deliberately forward of the existing Letterkenny PSC, adjacent to the Neil T. Blaney Road, as it is envisaged that a new urban streetscape will be established along this road through future developments.

The recently approved First Phase development of the Linear Park/Greenway will begin at the intersection with the new Joe Bonnar Link Road and travel in a westerly direction for a distance of 380m before terminating at Isle lane/Sprackburn. The Linear Park/Greenway shall include a two-way cycle lane, pedestrian walkway within an urban park environment, landscaping, public lighting, street furniture etc together with a corridor reserve for a future urban transport option. The corridor reserve and future urban transport option is purely conceptual at this time.

An Appropriate Assessment screening assessment was carried out for the Part 8 development comprising *inter alia* a new three storey multi-use Social Enterprise Centre and a First Phase development of a Linear Park/Greenway in Letterkenny, Co. Donegal. The screening exercise concluded that "*an appropriate assessment of the proposed development is not required as it can be excluded on the basis of objective scientific information that the proposed development individually or in combination with other plans/projects will have a significant effect on a European Site.*"

Summary of Potential for In-combination Impacts

It is noted that the Joe Bonnar Link Road, the Social Enterprise Centre and First Phase development of a Linear Park/Greenway, and the subject site for the proposed development are all located within the designated Town Centre Area for Letterkenny as identified in the County Donegal Development Plan 2018-2024 (CDP) and as such earmarked for development. The CDP has already been subject to a Stage 2 AA to assess the policies and objectives within and contains many general and specific policies and objectives contributing to the protection of Natura sites in accordance with the requirements of the Habitats Directive. The Natura Impact Report concluded a finding of No Significant Effects following the completion of Stage 2 of the process. Any potential impact on the Natura 2000 network has been mitigated against through the policies and objectives in the CDP. The Appropriate Assessment concluded that there was no requirement to proceed to Stage 3 of the AA as there is no significant detrimental effect identified as the result of implementation of the CDP to the integrity of any European Site.

Having regard to the above it is considered that no significant adverse in combination impacts on the conservation status or integrity of Natura 2000 sites are likely to arise as a result of the Joe Bonnar Link Road, the Social Enterprise Centre and First Phase development of a Linear Park/Greenway and the proposed Enterprise and Digital Hub building (Alpha Building).

2.5 Identification of Natura 2000 sites that may be affected

Best practice typically assumes that the zone of influence of a plan or project extends 15km beyond the area covered by the plan or project. This is in line with DECLG Guidelines (2010) and ensures that all potentially affected Natura 2000 sites are included in the screening process. All Natura sites occurring in the zone of influence of the proposed Enterprise and Digital Hub building (Alpha Building) (i.e. including the 15km buffer zone) are listed in Tables A1 and A2, Appendix A: Natura 2000 Sites Relevant to this Appropriate Assessment – along with their qualifying interests, conservation objectives and threats to site integrity.

The richly diverse environment has led to the designation of a large number of European, National and locally important sites across the County. There are a total of 73 Natura 2000 sites (both terrestrial and marine) within County Donegal comprising 47 Special Areas of Conservation (SAC) and 26 Special Protection Areas (SPA).

There are a total of 8 Natura 2000 sites located within the zone of influence of the proposed development (a 15km buffer area) as listed in Table 2.1 and illustrated on Figure 2.1. These Natura 2000 sites comprise 5 SACs and 3 SPAs, none of which are located within the application site.

Table 2.1: List of Natura 2000 Sites within a 15km buffer of the proposed Enterprise and Digital Hub Building (Alpha Building)

| Site Type | Site Code | Site Name | Located within the proposed development boundary | Located within a 15km radius of the proposed development | Distance of the Natura site from the proposed development |
|-----------|-----------|--|--|--|---|
| SAC | 000116 | Ballyarr Wood | No | Yes | c. 8.5km |
| SAC | 002047 | Cloghernagore Bog and Glenveagh National Park | No | Yes | c. 13.7km |
| SAC | 002176 | Leannan River | No | Yes | c. 8.2km |
| SAC | 002287 | Lough Swilly | No | Yes | c. 419m |
| SAC | 002301 | River Finn | No | Yes | c. 13.3km |
| SPA | 004039 | Glenveagh National Park (Derryveagh & Glendowan Mountains) | No | Yes | c. 12.5km |
| SPA | 004060 | Lough Fern | No | Yes | c. 10km |
| SPA | 004075 | Lough Swilly | No | Yes | c. 1.4km |

2.6 Conservation Objectives

The overall aim of the Habitats Directive is to maintain or restore the favourable conservation status of habitats and species of community interest listed in the Habitats and Birds Directives. Site-specific detailed conservation objectives have been developed for SACs and SPAs, and aim to define favourable conservation conditions for a particular habitat or species at that site.

Favourable conservation status of a habitat is achieved when:

- Its natural range, and area it covers within that range, are stable or increasing, and
- The specific structure and functions which are necessary for its long- term maintenance exist and are likely to continue to exist for the foreseeable future, and

- The conservation status of its typical species is favourable.

The favourable conservation status of a species is achieved when:

- Population dynamics data on the species concerned indicate that it is maintaining itself on a long-term basis as a viable component of its natural habitats, and
- The natural range of the species is neither being reduced nor is likely to be reduced for the foreseeable future, and
- There is, and will probably continue to be, a sufficiently large habitat to maintain its populations on a long-term basis.

2.7 Identify Potential effects on Natura 2000 sites

The potential impacts from the proposed development are assessed in the context of a number of factors that could, in the absence of mitigation, affect the integrity of Natura sites. These include direct impacts arising from development, and indirect impacts associated with resource demand and emissions. Such impacts may result from:

- Land take for infrastructural developments
- Creating barriers or severing links of mobile species
- Air emissions
- Water demand/wastewater treatment
- Additional drainage works and changes in landuse
- Disturbance of sensitive habitats or species due to tourism and recreation
- Landscape management, development and urbanisation
- Interference with mitigation measures of other plans

Impact can manifest itself as:

- Habitat loss within Natura sites
- Network fragmentation through loss of linking ecological corridors
- Species disturbance in terms of feeding, breeding, migration or roosting
- Reduction in species density, population size or reproductive capacity
- Changes in available water resource – quality and quantity
- Changes in soil properties

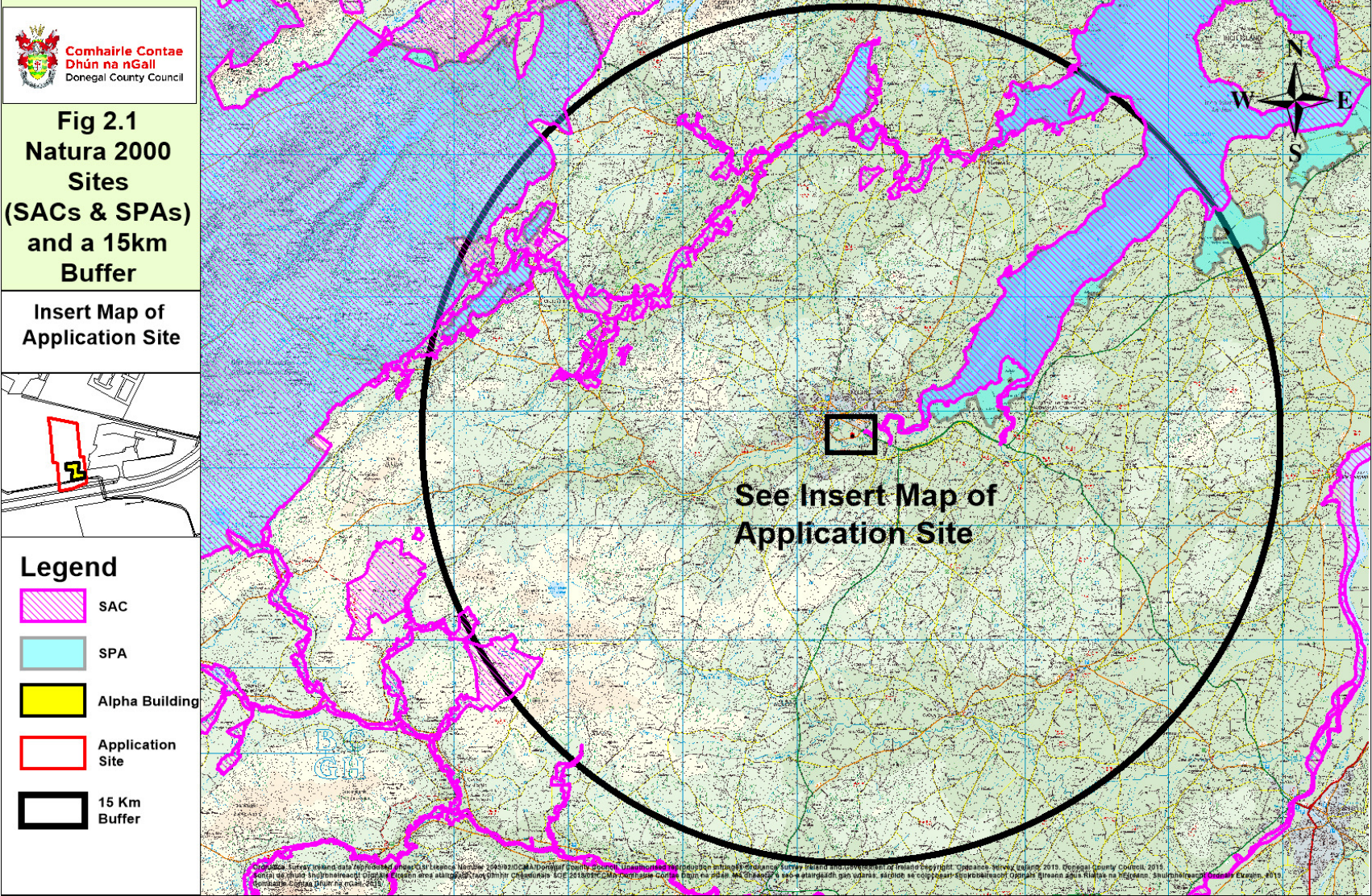
2.8 Assessment Criteria

In order to assess any potential impact of the implementation of the proposed Enterprise and Digital Hub building (Alpha Building) on the relevant Natura 2000 sites identified in Section 2.5 above, an impact screening matrix was developed to assess the proposed development and to determine the likelihood of potential significant impact, both in-situ and ex-situ. This screening matrix is presented in Appendix B.

2.8.1 Direct, Indirect or Secondary Impacts

It is concluded from Table 2.1 above that none of the Natura 2000 sites lie within the boundaries of the proposed development area; therefore, no direct impacts will occur through landtake or fragmentation of habitats.

The closest SAC to the subject site is Lough Swilly SAC, which is approximately 419m to the east of the site. The other identified SACs: Ballyarr Wood SAC, Cloghernagore Bog and Glenveagh National Park SAC, Leannan River SAC, and River Finn SAC are all located between 8-13.7kms from the subject site.



The closest SPA to the subject site is Lough Swilly SPA, which is approximately 1.4km to the east of the site. The remaining SPAs (Glenveagh National Park (Derryveagh & Glendowan Mountains) and Lough Fern) are located between 10-12.5kms from the subject site.

It is noted that Lough Swilly is located in closest proximity to the subject site. However, given the fact that the subject site is not immediately adjacent to Lough Swilly and is located in an existing urban environment it is not anticipated that any construction related activity would impact upon this watercourse. The SAC is physically separated from the application site by the existing Neil T Blamey Road and other urban infrastructure. In addition, best practice construction techniques will be adhered to for the proposed development to prevent any accidental pollution of the watercourse from either hydrocarbons or soiled/sediment laden waters. These construction techniques will include the implementation of sediment traps & silt screens in drains or small watercourses, an appropriate location for the site compound at a remove from watercourses, drainage lines or pathways to same and the presence of on-site spill kits. In addition bio-security measures will be in place to ensure that soils to be imported in the landscaping of the site are screened to prevent the introduction of invasive species. These steps will be introduced as best practice measures and not as mitigation measures and will eliminate any risk of accidental pollution of watercourses. A clearly defined monitoring programme will be implemented to ensure best practice procedures are carried out. It is important to note, that in accordance with the findings of the High Court (Simmons J.) in Heather Hill Management Company-v-An Bord Pleanála [2019] IEHC 450 the use of best practice techniques is simply that, best practice; rather than a measure that has been incorporated into the project in order to prevent or mitigate against adverse impacts on any European Site.

Lough Swilly is of major ornithological importance for wintering waterbirds with 18 species regularly occurring in nationally important numbers and three species in internationally important numbers. It is noted that habitats of the breeding bird species are located at a considerable distance from the application site. Furthermore, as previously noted the SPA is physically separated from the application site by the existing road network and urban landscape in the Town Centre area. Given the nature of the proposed development and its urban infill location, it will not result in any significant noise emanation activities. Any disturbance to bird species as a result of the proposed development is considered extremely unlikely, and therefore, no significant potential impacts are anticipated in relation to this SPA or other SPAs (Glenveagh National Park (Derryveagh & Glendowan Mountains) and Lough Fern) within a wider 15km catchment of the proposed development.

Similarly, the remaining SACs (Ballyarr Wood, Cloghernagore Bog and Glenveagh National Park, Leannan River, and River Finn) and SPAs (Glenveagh National Park (Derryveagh & Glendowan Mountains) and Lough Fern) within the 15km catchment area of the proposed development are considered to be a sufficient distance from the proposed development site, with no connecting pathways (e.g. rivers or streams) for indirect effects to occur. It is therefore not anticipated that there will be any likely significant impacts on these sites.

It is therefore concluded that the impacts of the construction and operation of the proposed development on the ecology of the area will not be significant.

2.8.2 Likely Changes to the Site

The likely changes that will arise from the proposed development have been examined in the context of a number of factors that could potentially affect the integrity of the identified Natura 2000 Sites. Overall, it has been found that the implementation of the proposed development will not affect the integrity of Natura 2000 Sites (see Table 2.2).

Table 2.2: Likely Affects on Natura 2000 Sites

| Site Name | Habitat Loss within Natura sites | Disturbance to Key Species | Habitats or Species Fragmentation | Reduction in Species Density | Changes in Key indicators of Conservation Value (Water Quality etc.) | Changes in Soil Properties |
|--|----------------------------------|----------------------------|-----------------------------------|------------------------------|--|----------------------------|
| Ballyarr Wood SAC | None | None | None | None | None | None |
| Cloghernagore Bog and Glenveagh National Park SAC | None | None | None | None | None | None |
| Leannan River SAC | None | None | None | None | None | None |
| Lough Swilly SAC | None | None | None | None | None | None |
| River Finn SAC | None | None | None | None | None | None |
| Glenveagh National Park (Derryveagh & Glendowan Mountains) SPA | None | None | None | None | None | None |
| Lough Fern SPA | None | None | None | None | None | None |
| Lough Swilly SPA | None | None | None | None | None | None |

2.8.3 Elements of the Project where the Impacts are Likely to be Significant

No elements of the proposed Enterprise and Digital Hub Building (Alpha Building) are likely to cause significant impacts.

3 Conclusions

Stage 1 Screening for Appropriate Assessment (AA) of the proposed Enterprise and Digital Hub building (Alpha Building) has been carried out (see Table B.1 in Appendix B of this report). The purpose of the screening exercise is to determine whether the proposed development could have significant effects on the Natura 2000 network of European sites within the zone of influence of the proposed development, either alone or in combination with other plans or projects, and consider whether these impacts are likely to be significant.

It has been determined that an appropriate assessment of the proposed development is not required as it can be excluded on the basis of objective scientific information that the proposed development individually or in combination with other plans/projects will have a significant effect on a European Site. This determination is made in view of the conservation objectives of the habitats or species for which these sites (considered in this report) have been designated.

APPENDIX A

Natura 2000 Sites Relevant to this Appropriate Assessment

Table A1: Special Areas of Conservation (SACs) within 15km of the proposed Enterprise and Digital Hub Building (Alpha Building)

| Site code | Site name | Qualifying interests | Conservation objectives | Threats to site integrity |
|-----------|---|--|--|---|
| 000116 | Ballyarr Wood | 91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles | <p>To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected (NPWS (2016) Conservation objectives for Ballyarr Wood SAC [000116]. Generic Version 5.0. Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs).</p> <p>To maintain the extent, species richness and biodiversity of the site. To provide facilities on site for the visiting public so as to improve its recreational use and potential educational value. To establish effective liaison and co-operation with neighbouring landowners, legal users and relevant authorities.</p> | <p>Direct loss of habitat to development; amenity/recreation use; invasive species; lack of/inappropriate woodland development; overgrazing (deer). Introduction of alien invasive species. Illegal Dumping. Felling/Removal of Trees.</p> |
| 002047 | Cloghernagore Bog and Glenveagh National Park | <p>3110 Oligotrophic waters containing very few minerals of sandy plains (<i>Littorelletalia uniflorae</i>)</p> <p>3260 Water courses of plain to montane levels with the <i>Ranunculus fluitantis</i> and <i>Callitriche-Batrachion</i> vegetation</p> <p>4010 Northern Atlantic wet heaths with <i>Erica tetralix</i></p> <p>4030 European dry heaths</p> <p>4060 Alpine and Boreal heaths</p> <p>6410 <i>Molinia</i> meadows on</p> | <p>To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected (NPWS (2017) Conservation Objectives: Cloghernagore Bog and Glenveagh National Park SAC 002047. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs).</p> | <p>Changes in local hydrology including drainage; peat extraction; overgrazing; forestry; burning; direct loss of habitat to development; arterial drainage/water abstraction/lowering of the regional water table; agricultural reclamation.</p> <p>Introduction of alien invasive species</p> <p>Illegal Dumping</p> <p>Increased pollution/reduction in water quality</p> <p>Felling/Removal of Trees</p> <p>Persecution (Poisoning)</p> |

Appropriate Assessment Screening of Enterprise and Digital Hub building (Alpha Building)

| Site code | Site name | Qualifying interests | Conservation objectives | Threats to site integrity |
|-----------|---------------|---|--|--|
| | | calcareous, peaty or clayey-silt-laden soils (Molinion caeruleae) 7130 Blanket bogs (* if active bog) 7150 Depressions on peat substrates of the Rhynchosporion 91A0 Old sessile oak woods with <i>Ilex</i> and <i>Blechnum</i> in the British Isles * 1029 Freshwater Pearl Mussel <i>Margaritifera margaritifera</i> 1106 Salmon <i>Salmo salar</i> 1355 Otter <i>Lutra lutra</i> 1421 Killarney Fern <i>Trichomanes speciosum</i> | | Potential threats to Freshwater Pearl Mussel |
| 002176 | Leannan River | 3110 Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) 3130 Oligotrophic to mesotrophic standing waters with vegetation of the Littorelletea uniflorae and/or Isoeto-Nanojuncetea 1029 Freshwater Pearl Mussel <i>Margaritifera margaritifera</i> 1106 Salmon <i>Salmo salar</i> 1355 Otter <i>Lutra lutra</i> 1833 Slender Naiad <i>Najas flexilis</i> | To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected (NPWS (2016) Conservation objectives for Leannan River SAC [002176]. Generic Version 5.0. Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs). | Changes in local hydrology including drainage; peat extraction; overgrazing; forestry; burning; direct loss of habitat to development; arterial drainage/water abstraction/lowering of the regional water table; agricultural reclamation, siltation. Introduction of alien invasive species Illegal Dumping Increased pollution/reduction in water quality Potential Threats to Freshwater Pearl Mussel |
| 002287 | Lough Swilly | 1130 Estuaries 1150 * Coastal lagoons | To maintain or restore the favourable conservation condition of the Qualifying | Agricultural improvements/reclamation; drainage/changes in local hydrology |

Appropriate Assessment Screening of Enterprise and Digital Hub building (Alpha Building)

| Site code | Site name | Qualifying interests | Conservation objectives | Threats to site integrity |
|-----------|------------|---|--|---|
| | | 1330 Atlantic salt meadows (Glauco-Puccinellietalia maritimae) 1355 Otter <i>Lutra lutra</i> 91A0 Old sessile oak woods with Ilex and Blechnum in the British Isles | Interests for which the SAC has been selected which are defined by the list of attributes and targets in the site-specific conservation objectives (NPWS (2011) Conservation Objectives: Lough Swilly SAC 002287 and Lough Swilly SPA 004075. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht), and in relevant supporting documentation. | including water abstraction; erosion (natural and anthropogenic); water quality/pollution; agricultural abandonment; overgrazing/undergrazing; direct loss of habitat to development; bracken & scrub encroachment; amenity/recreation use; tourism-related development. Introduction of alien invasive species Illegal Dumping; Burning; Felling/Removal of Trees; Quarrying/removal of sand; Aquaculture |
| 002301 | River Finn | 3110 Oligotrophic waters containing very few minerals of sandy plains (Littorelletalia uniflorae) 4010 Northern Atlantic wet heaths with <i>Erica tetralix</i> 7130 Blanket bogs (* if active bog) 7140 Transition mires and quaking bogs 1106 Salmon <i>Salmo salar</i> 1355 Otter <i>Lutra lutra</i> | To maintain or restore the favourable conservation condition of the Annex I habitat(s) and/or the Annex II species for which the SAC has been selected (NPWS (2017) Conservation Objectives: River Finn SAC 002301. Version 1. National Parks and Wildlife Service, Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs). | Water quality/ pollution (including groundwater), direct loss of habitat to development, invasive species, lack of woodland management. Introduction of alien invasive species Illegal Dumping Increased pollution/reduction in water quality Persecution (Poisoning) |

Table A2: Special Protection Areas (SPAs) within 15km of the proposed Enterprise and Digital Hub Building (Alpha Building)

| Site code | Site name | Qualifying interests | Conservation objectives | Threats to site integrity |
|-----------|--|---|---|--|
| 004039 | Glenveagh National Park (Derryveagh & Glendowan Mountains) | A001 Red-throated Diver <i>Gavia stellata</i> A098 Merlin <i>Falco columbarius</i> A103 Peregrine <i>Falco peregrinus</i> A140 Golden Plover <i>Pluvialis apricaria</i> A466 Dunlin <i>Calidris alpina schinzii</i> | To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA (NPWS (2016) Conservation objectives for Derryveagh and Glendowan Mountains SPA [004039]. Generic Version 5.0. Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs). | Direct & indirect impacts to the habitats of the bird species of conservation interests (loss of habitat); direct loss of habitat to development; water quality/pollution; disturbance including recreation/amenity use. Introduction of alien invasive species Illegal Dumping Persecution (Poisoning) Disturbance from Recreational/amenity use Inappropriate land management |
| 004060 | Lough Fern | A059 Pochard <i>Aythya ferina</i> | To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA (NPWS (2016) Conservation objectives for Lough Fern SPA [004060]. Generic Version 5.0. Department of Arts, Heritage, Regional, Rural and Gaeltacht Affairs). | Direct & indirect impacts to the habitats of the bird species of conservation interests (loss of habitat); direct loss of habitat to development; water quality/pollution; disturbance including recreation/amenity use. Introduction of alien invasive species Illegal Dumping Disturbance from Recreational/amenity use Inappropriate land management |
| 004075 | Lough Swilly | A005 Great Crested Grebe <i>Podiceps cristatus</i> A028 Grey Heron <i>Ardea cinerea</i> | To maintain or restore the favourable conservation condition of the bird species listed as Special Conservation Interests for this SPA which are defined by the list of | Direct & indirect impacts to the habitats of the bird species of conservation interests (loss of habitat); direct loss of habitat to development; water |

Appropriate Assessment Screening of Enterprise and Digital Hub building (Alpha Building)

| Site code | Site name | Qualifying interests | Conservation objectives | Threats to site integrity |
|-----------|-----------|--|---|---|
| | | A038 Whooper Swan <i>Cygnus cygnus</i> A043 Greylag Goose <i>Anser anser</i> A048 Shelduck <i>Tadorna tadorna</i> A050 Wigeon <i>Anas penelope</i> A052 Teal <i>Anas crecca</i> A053 Mallard <i>Anas platyrhynchos</i> A056 Shoveler <i>Anas clypeata</i> A062 Scaup <i>Aythya marila</i> A067 Goldeneye <i>Bucephala clangula</i> A069 Red-breasted Merganser <i>Mergus serrator</i> A125 Coot <i>Fulica atra</i> A130 Oystercatcher <i>Haematopus ostralegus</i> A143 Knot <i>Calidris canutus</i> A149 Dunlin <i>Calidris alpina</i> A160 Curlew <i>Numenius arquata</i> A162 Redshank <i>Tringa totanus</i> A164 Greenshank <i>Tringa nebularia</i> A179 Black-headed Gull <i>Chroicocephalus ridibundus</i> A182 Common Gull <i>Larus canus</i> | attributes and targets in the site-specific conservation objectives (NPWS (2011) Conservation Objectives: Lough Swilly SAC 002287 and Lough Swilly SPA 004075. Version 1.0. National Parks and Wildlife Service, Department of Arts, Heritage and the Gaeltacht), and in relevant supporting documentation. | quality/pollution; disturbance including recreation/amenity use. Introduction of alien invasive species Illegal Dumping Inappropriate land management Disturbance from Recreational/amenity use |

Appropriate Assessment Screening of Enterprise and Digital Hub building (Alpha Building)

| Site code | Site name | Qualifying interests | Conservation objectives | Threats to site integrity |
|------------------|------------------|---|--------------------------------|----------------------------------|
| | | A191 Sandwich Tern <i>Sterna sandvicensis</i> A193 Common Tern <i>Sterna hirundo</i> A395 Greenland White-fronted goose <i>Anser albifrons flavirostris</i> wintering A999 Wetlands & Waterbirds | | |

APPENDIX B

Impact Assessment Screening Matrix for Proposed Enterprise and Digital Hub Building (Alpha Building)

Table B.1: Impact Assessment Screening Matrix for Proposed Enterprise and Digital Hub Building (Alpha Building)

| Proposed development | Natura 2000 Sites That May Be Affected | Potential Impact of Proposed development | Risk of Significant Impact | Potential of In-Combination Impacts | Risk of Significant In-Combination Impacts' | Appropriate Assessment Screening |
|---|--|---|--|-------------------------------------|---|---|
| <p>3 storey Enterprise and Digital Hub facility with a total floor area of 1,640m² and all associated ancillary works to include site drainage, parking, connection to the public water supply and other services, landscaping, appropriate boundary treatment, development related signage, connection & discharge to the public sewerage network</p> | <p>Potentially all sites within the zone of influence of the proposed development but in particular Lough Swilly SAC (002287) and SPA (004075), having regard to their proximity to the subject site</p> | <p>Unlikely but potential impact on Natura 2000 sites through infrastructure development, land take, disturbance etc.</p> | <p>Unlikely given the nature of the proposed development and its urban infill location</p> | <p>Unlikely</p> | <p>Unlikely</p> | <p>No potential for impacts on Natura 2000 sites to arise due to this proposed development. The proposed development would therefore not necessitate Stage 2 AA.</p> |

Appendix E – TTS1, Traffic & Transport Form



| | |
|---|--|
| TTS 1 | TRAFFIC AND TRANSPORT STATEMENT |
| QUESTIONS 1-3 TO BE COMPLETED FOR ALL PLANNING APPLICATIONS | |

| | | | |
|------------------------|------------------------|----------------------------------|--|
| Local Authority | Donegal County Council | Reference number | |
| | | <small>(Office use only)</small> | |

| | |
|----------------|---|
| 1 | Application Details: |
| Name | Proposed Enterprise Centre & Digital Hub Building (Alpha Building), Ballyraine Letterkenny, Co. Donegal |
| Address | Ballyraine, Letterkenny (Lands adjacent Letterkenny Public Services Centre) |

| | |
|--|--|
| 2 | Development Details |
| Description of proposed Development | Proposed 3 storey Enterprise Centre to facilitate a range of business establishments and associated site works and parking accessed via Joe Bonnar Link Road |
| On which road(s) does site have frontage(s) Provide Road number(s) | N / R / L TBC |

| | |
|---|------------------------------|
| 3 | Single Dwelling House |
| Is the proposed development only a single dwelling house? | Yes/No ✓ |

If the answer to 3 above is "Yes" go to section 5, if the answer to 3 above is "No" complete section 4

| | | | | | |
|--|---|------------|----|--------------|-----------------|
| Section 4 | Traffic and Transport Impacts | | | | |
| What is the size of the proposed development? (m ² or no of units) | 1640m ² | | | | |
| How many trips will be made per day to the site? | | | | | |
| Car driver | 20 | Pedestrian | 30 | Bus / Tram | 30 |
| Car passenger | 30 | Cyclist | 20 | Rail | N/A |
| HCV (Indicate type/size) | 0.1 | Taxi | 20 | Total | 150 |
| Will traffic to/from the development be more than 10% of existing traffic on the adjoining road (5% in case of an already congested road)? | | | | | Yes/No |
| Is a new or modified access to the site needed to join the existing road network? | | | | | Yes/No ✓ |
| What changes to the existing road layout are required as a result of this development? | None proposed | | | | |
| Is there existing public transport access to the development? Describe. | TBC by Donegal County Council | | | | |
| What specific public transport provision is to be made as part of the development? | TBC by Donegal County Council | | | | |
| What specific provision is to be made for pedestrians/cyclists as part of the development? | Covered cycle parking to be provided. Proposed development links to existing cycle routes and proposed Greenway to existing Town Centre | | | | |

Section 5

I believe the statements outlined above to be a fair and competent assessment of the effects of the development described above on the adjoining road network and access routes. I further believe the changes proposed in this assessment will effectively remedy the possible adverse effects on road capacity and safety caused by this development

Donegal County Council
Signed..... Developer

01.08.19
Date.....

Signed..... Agent

Date.....

It was assessed that this development did not exceed any of the thresholds described in Table 2.1 of the NRA Guideli

Appendix F – Proposed Drawings**Drawing Schedule****Proposed Enterprise and Digital Hub building (Alpha Building)**

| Item No. | Drawing No. | Title |
|-----------------|---------------------|----------------------------------|
| 1 | 2019011/002/003-001 | Site Location/Site Extents Plan |
| 2 | 2019011/002/003-002 | Proposed Site Plan |
| 3 | 2019011/002/003-003 | Ground floor & first floor plans |
| 4 | 2019011/002/003-004 | Second floor & roof plan |
| 5 | 2019011/002/003-005 | Elevations & Sections |