



Central Planning Unit,
Donegal County Council,
County House,
Lifford,
Co. Donegal
F93 Y622

31/05/2022

RE: Variation No.2 to the Donegal County Development Plan 2018-2024

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the proposed Variation No.2 to the Donegal County Development Plan 2018-2024.

This submission is made specifically concerning flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines'. Further submissions on the draft Plan may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

It is noted in Section 7.3.7 Material Assets of the Environmental Report that, "*The Wind Energy Development Guidelines specifically recommend that such developments demonstrate compliance with the Ministerial Flood Risk Management Guidelines and are accompanied by detailed flood risk statements. In turn amendment No. 13 (Policy E-P-13 of the variation) specifically requires that wind farm developments comply with said guidelines*". However, it was found that amendment No.13 refers to new Policy E-P-22 and amendment No.10 refers to amended Policy E-P-13. Neither amendment includes a requirement to comply with the Flood Risk Management Guidelines.

Should any changes to zoning designations in areas of flood risk be implemented in future, it is important that a flood risk assessment to an appropriate level of detail is carried out and that there is appropriate justification for any decisions made as set out in the Guidelines.

If further information or input is required, please do not hesitate to contact the OPW, floodplanning@opw.ie. in advance of the completion of the proposed Variation No.2 to the Donegal County Development Plan 2018-2024.



Yours sincerely,

Rachel Woodward

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments