

From: Stephen Kelly [REDACTED]
Sent: 05 April 2021 21:16
To: tentcdpvariation
Subject: Ten -T CDP variation submission Eugene Kelly [REDACTED]

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Dear Sir/Madam,

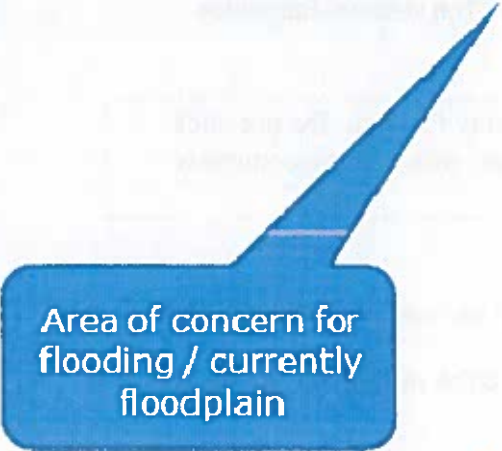
I wish to make the following submission on the variation to the CDP as published on Donegal Co Co website under the heading:

Proposed Variation to the County Donegal Development Plan 2018-2024 in respect of the TEN-T Priority Route Improvement Project, Donegal (Variation No. 1)

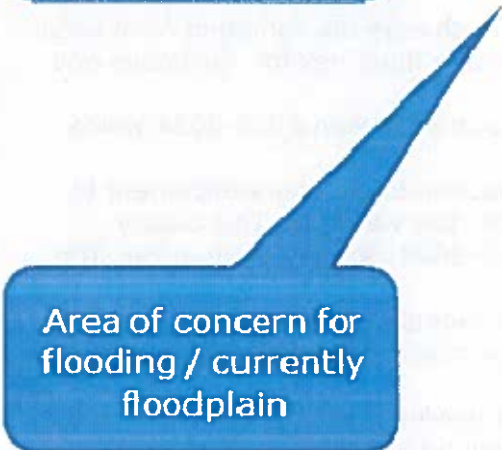
- I have concerns about an area of ground that it is proposed to change the zoning of from Local Environment to Residential in the variation as this may propose a flood risk for our house and neighbouring houses.
- See below Fig 5.5 p55 (pdf p68) of Seven Strategic Towns Local Area Plan 2018-2024 which shows this zoning as Local Environment.
- This area is also shown on map 15.2 p43 (p44 pdf) of Introduction Explanatory document to the Proposed Variation. It is shown here as residential "before" the variation. This clearly conflicts with the Seven Strategic Towns Local Area Plan 2018-2024, so may be an error. This change is also not shown in the Material Variations.
- This area is shown on the following page "Revised" map as Residential
- The fields to the south of the Burn Darnett and the Weavers act as a flood plain in times of heavy rain and flood extensively.
- Flood waters have come to within approximately 1 m of back garden ground level in the worst seen situation in the past decade to the rear of No13. This may be worse at no. 8 to 9 The Weavers as they are slightly lower. As long as there is no development which has a detrimental effect on this water level, there may not be an immediate risk.
- Development downstream on the Burn Darnett (i.e. in the proposed rezoned area) could pose a very significant flood risk as the means for the flood water to escape could be restricted.
- Flood prone area are outlined on Fig 5.6 p55 (pdf p68) of Seven Strategic Towns Local Area Plan 2018-2024 – see below. The area south of The Weavers is slightly off the map but would be available to DCC. The extensive flood risk area overlaps the proposed rezoned area substantially. Any interference with the flood plain here must clearly have impact for areas upstream also.
- A previous application for planning permission in this area was refused in 2018: Ref Chief Executive's Order No: 2018PH1569 Reference Number: 18/50413
 - The grounds for refusal were:
 - "The subject site is located on lands zoned as Amenity and Local Environment in the Ballybofey and Stranorlar Local Area Plan, 2018-2024"
 - Flood risk

Indeed, through DCC diligence, though the application was refused, including due to flood risk "elsewhere", the flood risk assessment by RPS submitted did not appear to consider flood risk other than on the development site.

- Even, though I do not see that there is currently a flood risk to the house, there have been difficulties securing house insurance mainly, I believe, due to the use of out-of-date maps by insurers that do not show the ground under the Weavers was filled/raised. Any interference with the flood plain may turn this perceived flood risk into a real one.
- On the basis of this evidence, this rezoning presents an unacceptable flood risk and I would ask that it not go ahead.
- Due to the risk involved here, I will be taking this most seriously, so I would ask that you do not take any steps to increase flood risk. It is particularly concerning that something like this might go ahead when the maps in the LAP and Variation as outlined are (strangely) clearly in conflict.



Area of concern for flooding / currently floodplain



Area of concern for flooding / currently floodplain

Figure 5.5: Ballybofey / Stranorlar Centre, Flood Extents Mapping

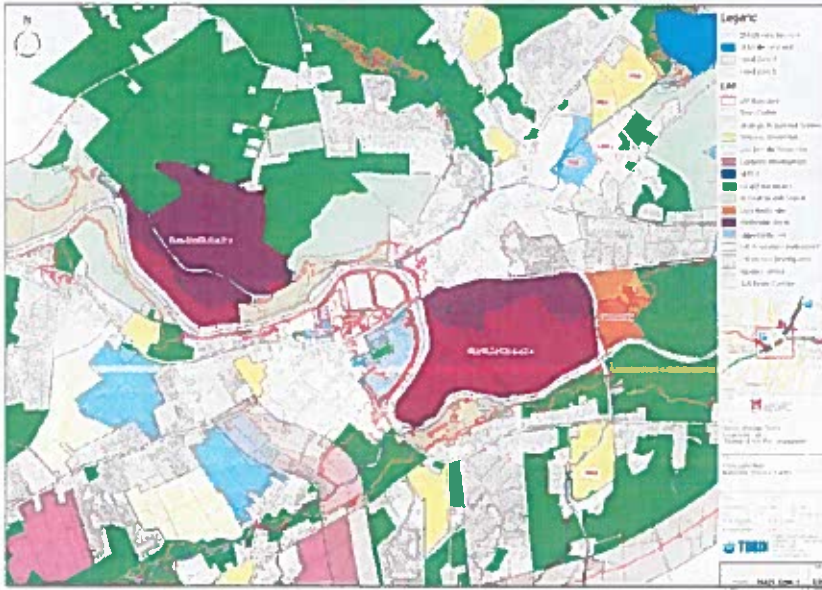
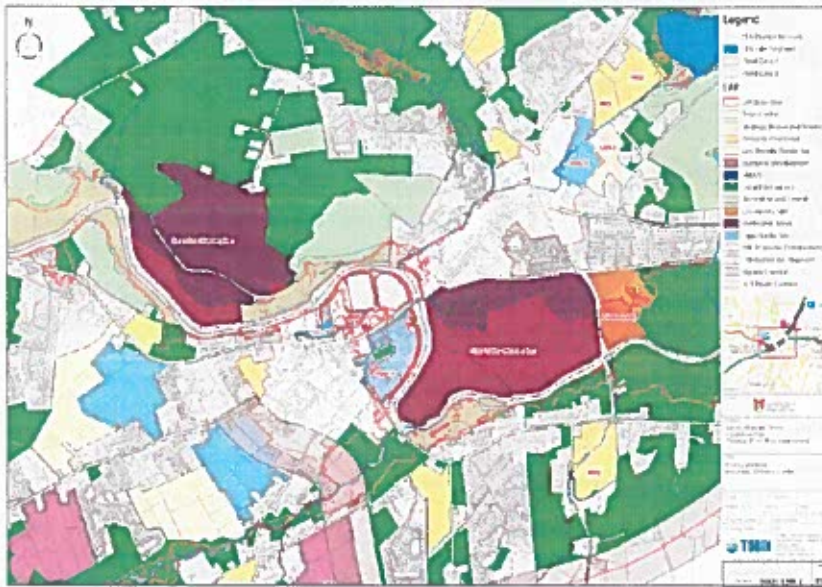


Figure 5.5: Ballybofey / Stranorlar Centre, Flood Extents Mapping



Revised Map 15.2 p45 (p45 pdf) of Introduction Explanatory document to the Proposed Variation

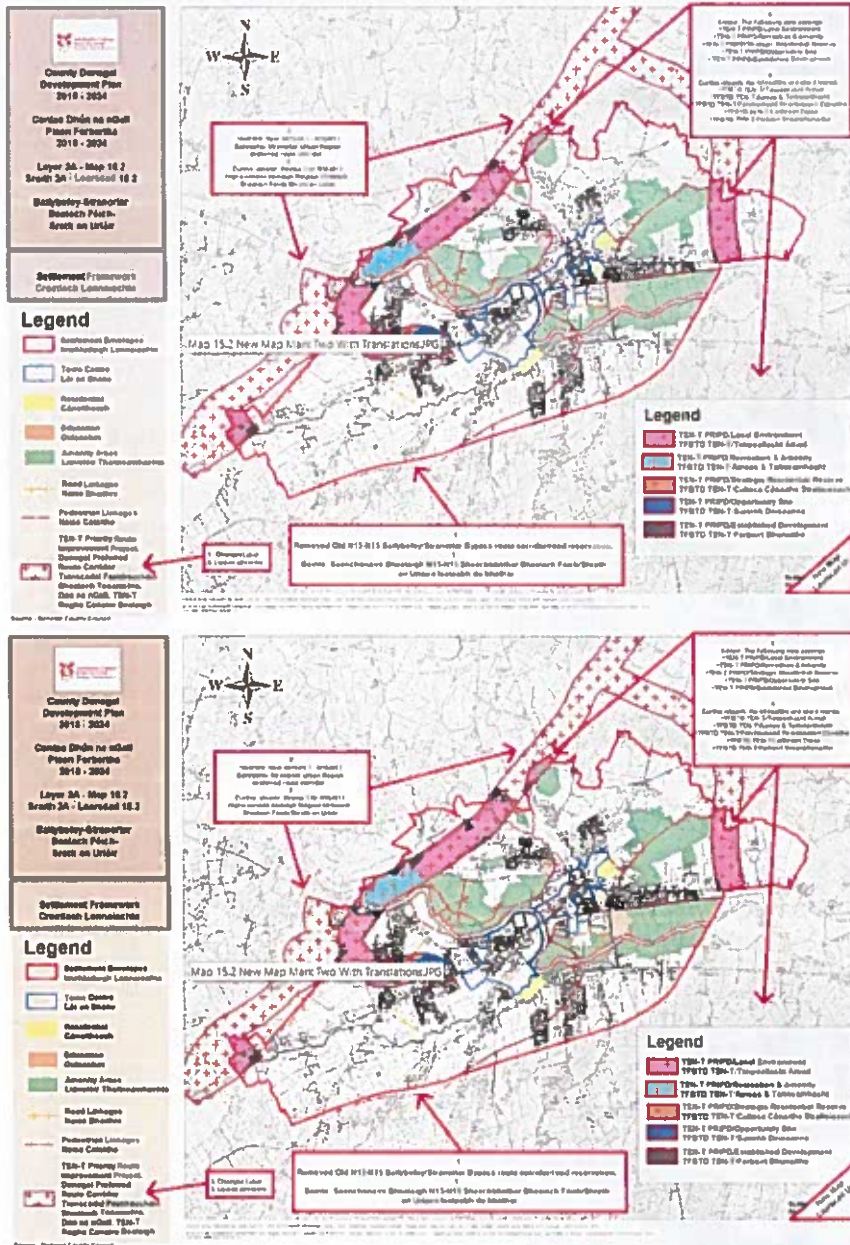
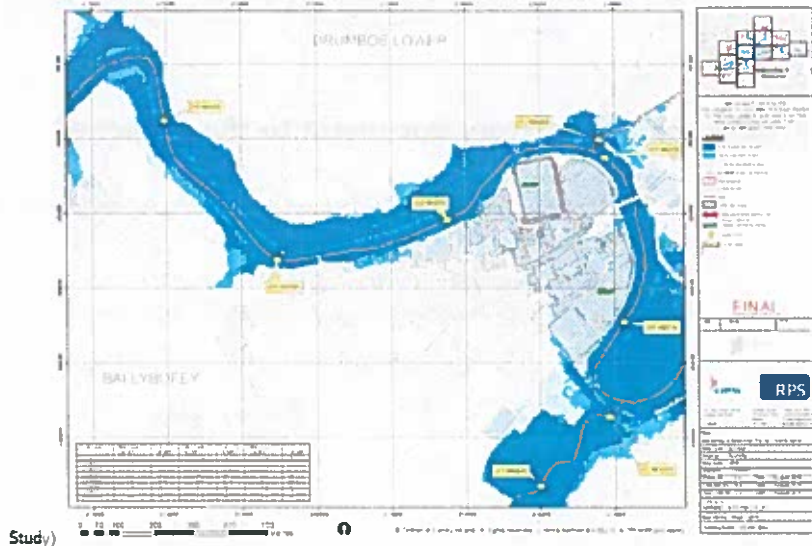


Fig 5.6 p55 (pdf p68) of Seven Strategic Towns Local Area Plan 2018-2024

Figure 5.6: Ballybofey / Stranorlar Flood Embankment Locations (source: OPW CFRAM)



**Your Sincerely
Eugene Kelly**



