



**TEN-T Variation,
Central Planning Unit,
Donegal County Council,
County House,
Lifford,
Co. Donegal,
F93Y622**

07/04/2021

RE: Proposed Variation to the County Donegal Development Plan 2018 – 2024 in respect of the TEN-T PRIPD (Variation no. 1)

Dear Sir/Madam,

The Office of Public Works (OPW), as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Proposed Variation to the County Donegal Development Plan 2018 – 2024 (Variation no. 1). The OPW welcomes Donegal County Council's commitment to adhering to "The Planning System and Flood Risk Management – Guidelines for Planning Authorities", from here on referred to as the Guidelines, and the preparation of a Strategic Flood Risk Assessment (SFRA).

The following comments highlight opportunities for the Variation to the Plan before it is finalised.

Justification Test

The OPW notes and welcomes that a Justification Test has been carried out with respect to the five identified areas. It is also noted as per Section 6.2 that areas of Flood Zone A and B that the preferred corridor traverses are "*minor and managing the flow of water by culverting beneath the proposed road or small span bridges will be readily achieved, acknowledging that a section 50 application under the Arterial Drainage Act will be prepared to ensure these structures are adequate to convey flow and ensure that there is no increased risk in flooding*".

Preliminary Flood Risk Assessment (PFRA)

Section 5.5 of the SFRA states that "*For those areas of the preferred route corridor that are outside the above AFAs the PFRA flood mapping was used.*"

The PFRA was a national screening exercise, to scope the CFRAM Programme and to identify areas of potentially significant flood risk. It is important to note that the PFRA was not a detailed assessment of flood risk. It was rather a broad assessment, based on available and readily derivable information to identify areas that may require further assessment. Cautions and limitations around the use of Indicative PFRA mapping in planning have been set out in Circular PL 2/2014, where it is noted that "*the (PFRA)*



maps provide only an indication of areas that may be prone to flooding. They are not necessarily locally accurate and should not be used as the sole basis for defining Flood Zones, or for making decisions on planning applications”.

Proposed Flood Relief Schemes

The SFRA notes that flood relief schemes are currently being progressed in Lifford and Ballybofey/Stranorlar, and a scheme is proposed in Letterkenny, which could be affected by TEN-T PRIPD.

Consideration might be given to specific policy objectives that have full regard to the development of these flood relief schemes, to ensure that design and planning of TEN-T PRIPD supports and does not impede or prevent the progression of these measures.

Arterial Drainage Schemes and Drainage Districts

No specific commentary has been provided on Arterial Drainage Schemes potentially affected by TEN-T PRIPD. These include the Deel and Swillyburn, the Swilly, the Swilly Big Isle, and the Swilly Oldtown Newmills schemes. The OPW notes and welcomes existing Policy number F-P-7 “*not to permit developments that would hinder the maintenance of river or drainage channels*”.

Consideration should be given in planning and implementation of the project to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. The location of Arterial Drainage Schemes and Drainage Districts may be viewed on www.floodinfo.ie.

SuDS & Surface Water Drainage

The OPW welcomes Section 4.2 of the SFRA on Surface Water and Drainage, in particular existing policy number Policy F-P-5 regarding the promotion of SuDS, and the requirements that:

- All development proposals for the TEN-T Priority Route Improvement Project shall carry out a surface water and drainage assessment and shall ensure that drainage from the site is managed sustainably
- All new developments incorporate SuDS such as Swales, Permeable Pavements, Filter Drains, Storage Ponds, Constructed Wetlands, Soakaways etc.
- Culverting be confined to road crossings and be subject to Section 50 application
- Maximum permitted surface water outflow for any new development be restricted to that of a greenfield site
- All proposed structures be set back from the edge of a watercourse with a minimum 15m riparian buffer recommended

Climate Change



The OPW notes and welcomes the discussion on the mid-range and high-end future scenarios in preparation of the SFRA, and the recommendations that the impacts from climate change be considered at the planning and design stage of the development.

Flood Map Information and Past Flooding

Section 1.2 Disclaimer states that information on the North West CFRAM is available at www.cfram.ie, and Section 5.2 refers to historical flood data provided on www.floodmaps.ie. Please note that these websites are no longer available. Information on the National CFRAM Programme, and on historical flood data is now available on www.floodinfo.ie.

It should be noted that while www.floodinfo.ie is the correct portal for past flood events, the OPW have records of flood events in the vicinity of the proposed route for TEN-T PRIPD, which have not yet been published on the portal. Up to date information may be obtained from the OPW Data Management Section via email (flood_data@opw.ie).

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 Donegal County Development Plan 2018 – 2024 Variation no. 1.

Yours sincerely,

A handwritten signature in blue ink that appears to read "Mark Adamson".

PP Mark Adamson
Flood Relief and Risk Management Division