

Donegal CDP TEN-T Consultation

April 2021

1. I welcome Donegal County Council's (DCC) consultation on a Proposed Variation to the County Donegal Development Plan 2018-2024 (the CDP 2018-2024) in respect of the TEN-T Priority Route Improvement Project and recognise potential catalysing effect of this strategic improvement of infrastructure for growth/investment in the North West Region.
2. Whilst I wholly support the enhancement of strategic road infrastructure in the North West Region I would seek assurance that DCC has comprehensively considered the potential transboundary environmental effects of the project. Against a backdrop of an increasing number of strategic infrastructure projects that have succumbed to legal challenge, I cannot overstate the importance of undertaking robust, comprehensive and appropriate technical assessments that demonstrate the effects of the project have been suitably avoided, mitigated and/or justified. Due consideration at this early stage to screen and scope environmental/technical issues will limit the potential for significant delays due to subsequent legal challenge.
3. I have reviewed the Strategic Flood Risk Assessment (SFRA) that has been prepared in support of the Proposed Variation, where it assesses the potential flooding impact of the project. In particular, I note that Corridor 3 - Manor to Lifford traverses the Swilly Burn to the east of Raphoe and the River Deele to the west of Lifford. I further note that the Lifford Area Further Assessment (AFA) is affected by the lower reaches of the Rivers Finn, Mourne and Deele and the upper reaches of the River Foyle.
4. With respect to the SFRA I would make the following observations;
 - It is encouraging that the Flood Zone mapping is based on the best available data (derived mainly from the North Western CFRAM mapping and the PFRA mapping for areas outside of the AFAs identified in the CFRAMs study) and that the catchments established within the model consider the interaction of flooding between the rivers Finn, Mourne and Foyle to address the cross border/transboundary flooding context enshrined in the EU Floods Directive. I support this trans-boundary approach to assessing the flood risk of the project and would seek assurance that DCC will continue to deploy this methodology as the project progresses.

- Obviously, the TENT project interfaces the wider road network, including the A5 Western Transport Corridor. I would invite confirmation that the SFRA takes into account the cumulative effects of these trans-boundary infrastructure projects? At the Public Inquiry into the proposed A5 Western Transport Corridor, it was confirmed that an increase in flood height would result from the proposals and have a detrimental effect on lands at risk of flooding. To note, approximately 15% of the entire A5 route from Newbuildings to south of Aughnacloy is located within a flood plain with 7.5% of the route located in the Foyle flood plain. The total area of land that requires to be vested for flood compensation would amount to 63 hectares.
On this basis, I would seek confirmation that the SFRA has taken into account the cumulative potential flood impacts, in combination with the A5 WTC, on the River Foyle flood plain, rather than (incorrectly) using a present day baseline.
 - The SFRA advises in its conclusion that "Flood Risk to the development can be adequately managed and the development will not cause unacceptable adverse impacts elsewhere subject to the implementation of project level Flood Risk Assessment, design and mitigation measures". However, earlier in the conclusion it states that "the Flood Zone mapping is based on the best currently available data and a more detailed, site specific FRA may generate localised flood extents". Whilst I appreciate that the level of Flood Risk Assessment that has been carried out is deemed to be at a suitable scale to support the Proposed Variation to the County Donegal Development Plan 2018-2024 (the CDP 2018-2024) I want to ensure that DCC is satisfied that the potential cumulative impact of localised flooding has been fully assessed and understood.
5. I also understand that the Republic of Ireland signed the United Nations protocol in relation to Transboundary Environmental Impacts and as Islandmore is positioned in the Foyle between the Republic of Ireland and Northern Ireland it is imperative that these Protocols are adhered to.
6. Again, I would like to reiterate my support for the TENT Priority Route Improvement Project and the economic, road safety and accessibility benefits that the project will bring, however, the cumulative flood impacts of this type of development can be significant. I want to ensure that DCC is confident that it has fully assessed all flood risk associated with the development and to ensure that existing land owners, adjacent to and in the wider catchment of the development, are not detrimentally impacted by the proposed works.

PE Lundy
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