

Deirdre Skelly

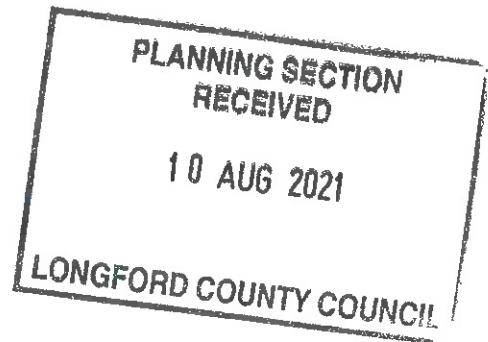
From: Manager DAU <Manager.DAU@housing.gov.ie>
Sent: Tuesday 10 August 2021 14:10
To: cdp
Cc: info@opr.ie
Subject: EXTERNAL - Proposed Material Amendments to the Longford County Development Plan 2021 - 2027
Attachments: FP2021-052 LONG jl.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

I refer to correspondence sent to the Department in connection with the above proposed material alterations to the County Development Plan.

Attached are the heritage related observations of this Department as co-ordinated by the Development Applications Unit.

Regards,



Michael Murphy
Aonad na nIarratas ar Fhorbairt
Development Applications Unit
Oifigí an Rialtais
Government Offices
Bóthar an Bhaile Nua, Loch Garman, Contae Loch Garman, Y35 AP90
Newtown Road, Wexford, County Wexford, Y35 AP90

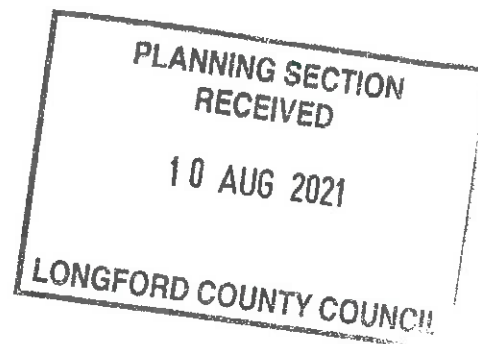
Is faoi rún agus chun úsáide an té nó an aonán atá luaite leis, a sheoltar an ríomhphost seo agus aon comhad atá nasctha leis. Má bhfuair tú an ríomhphost seo trí earráid, déan teagmháil le bhainisteoir an chórais.

Deimhnítear leis an bhfo-nóta seo freisin go bhfuil an teachtaireacht ríomhphoist seo scuabtha le bogearraí frithvíorais chun víorais ríomhaire a aimsiú.

This email and any files transmitted with it are confidential and intended solely for the use of the individual or entity to whom they are addressed. If you have received this email in error please notify the system manager.

This footnote also confirms that this email message has been swept by anti-virus software for the presence of computer viruses.

An Roinn Tithíochta,
Rialtais Áitiúil agus Oidhreachta
Department of Housing,
Local Government and Heritage



Ref: **FP2021/052**
(Please quote in all related correspondence)

10 August, 2021

Administrative Officer,
Draft County Development Plan,
Forward Planning Unit,
Longford County Council,
Áras An Chontae,
Great Water Street, Longford, N39 NH56

Via email: cdp@longfordcoco.ie

Re: Notification under the Planning and Development Regulations, 2001, as amended.

Proposed Material Amendments to the Longford County Development Plan 2021 - 2027

A chara

I refer to correspondence sent to the Department in connection with the above proposed material alterations to the County Development Plan.

Outlined below are the heritage related observations of this Department as co-ordinated by the Development Applications Unit under the stated headings.

Nature Conservation

The Department welcomes the opportunity to provide observations at the final 'material alterations' stage of the review process. The Department previously provided observations at Issues Paper Stage on the 22/11/2019 Referral Reference No. FP2019/079, and at the Draft Plan Stage on the 15/1/2021 Referral Reference No. FP2020/065.

The Department's observations are offered to assist Longford County Council in meeting its statutory obligations with regard to protecting European sites, Natural Heritage Areas (NHAs), other vulnerable natural habitats, protected species and biodiversity in general, during the process of preparing and implementing the new County Development Plan (CDP) for 2021-2027.

The Department welcomes and acknowledges the material alterations that are cognisant of the Departments' previous observations and recommendations. These amendments will improve and strengthen the protection of nature conservation across the county during plan



implementation. In particular, the Department welcomes and supports the inclusion of the proposed additional policy objectives on nature conservation within; Chapter 8 Rural Economy, Chapter 12 Natural Heritage and Environment and Chapter 13 Green Infrastructure.

Notwithstanding the above, the Department is concerned that the Draft Longford County Development Plan 2021-2027 Material Alterations Volume II Appendix- Material Amendment AP.IE.18 (pg 68-69) for Clondra includes an area with an elevated risk of flooding.

This material alteration is identified in the Environmental and Flood Reports Volume 4 (page 4). The report notes that the Proposed Material Alteration (Residential extension northwards from Draft Plan Clondra plan area) would not be in compliance with Flood Risk Assessment Guidelines and Circular PL 2/2014. The Report indicates that further modification would be required to this change to avoid the Flood Zone. In addition, the Strategic Environmental Assessment (SEA), SEA Environmental Report (SEA ER) (page 96) also notes that, Proposed Material Alteration AP.IE.18 would not be in compliance with The Planning System and Flood Risk Management Guidelines for Planning Authorities (DEHLG/OPW, 2009) and would provide for new vulnerable development on lands, some of which are at elevated risk from flooding.

The Department highlights that the flooding of currently developed lands within the Shannon catchment is a strategic concern at national level and remains an ongoing issue with a high resource demand. Several Departments and state bodies including this Department contribute to the flood risk management task force for the Shannon basin. The Department emphasises that development and associated runoff/ drainage at one location may impact semi-natural processes and or flood risk down and upstream at extensive distances from the development concerned (e.g. outside of Longford County).

The SEA ER indicates that the provision of development lands with elevated flood risk at Clondra in the Draft plan increases the risk of adverse impacts arising to downstream nature conservation, environmental and biodiversity receptors. Specifically, the lands at Clondra are bounded by several adjacent waterways with direct (<1km) connection to the river Shannon to the west. These hydrological constraints are further compounded by the Lough Forbes Complex SAC (site code 001818) and Ballykenny-Fisherstown Bog SPA (site code 004101) immediately adjacent to the east. As a result, the management of water, including any future need to manage flood water in this area is constrained by the proximity to natural barriers and or environmental legislative obligations.

Best practice suggests that lands prone to flooding that are constrained in their ability to manage (i.e. reduce and or increase) input and output waters should not be subject to development that may require off site engineering solutions and or result in immitigable risks to downstream nature conservation receptors. Consequently, the Department recommends that further consideration (i.e. further flood and environmental risk assessment) is given to the outworkings, risks and potential impacts to nature



conservation, biodiversity and the wider Shannon river environment arising from the proposed development on the lands at Clondra.

You are requested to send any further communications to the Development Applications Unit (DAU) at manager.dau@housing.gov.ie, or to the following address:

The Manager,
Development Applications Unit (DAU)
Government Offices, Newtown Road, Wexford, Y35 AP90

Is mise le meas,


Michael Murphy

Development Applications Unit