

**Proposed Material Alterations**  
**to the**  
**Draft Fiddown Local Area Plan 2010**

*Kilkenny County Council*  
*Forward Planning*



15<sup>th</sup> November 2010



## Overview

This report is set out as follows:

- Introduction
- Proposed Material Alterations to Fiddown Draft Local Area Plan 2010
- Proposed Material Alterations to Fiddown Draft LAP Appropriate Assessment Screening Report
- Proposed Material Alterations to Fiddown Draft LAP Strategic Environmental Assessment Screening Report

## 1.0 Introduction

In accordance with Section 20 (3)(e) of the *Planning and Development Acts 2000-2010*, Kilkenny County Council is proposing a number of material alterations to the *Fiddown Draft Local Area Plan 2010* which was published on the 7<sup>th</sup> July 2010. These material alterations have arisen following the Elected Members review of the *Manager's Report on Submission received to the Draft Fiddown Local Area Plan* under section 20 (3)(c) of the *Planning and Development Acts 2000-2010*.

The proposed material alterations to the text are outlined below and should be read in conjunction with the *Fiddown Draft Local Area Plan*; proposed deletions are shown in ~~strike through~~ and proposed insertions are show in *italics*.

Where an issue was raised as part of a submission the reference number of the corresponding submission has been given (example FD2-ii). A summary of the submissions made and the Manager's response to each can be found in the *Manager's Report on Submissions received to the Draft Fiddown Local Area Plan*.

This document also sets out the proposed material alterations to the *Fiddown Draft LAP Appropriate Assessment Screening Report* and the *Fiddown Draft LAP Strategic Environmental Assessment Screening Report*, which should be read in conjunction with those reports.

## 2.0 Proposed Material Alterations to Fiddown Draft Local Area Plan 2010

- Section 1.4 National, Regional and County Strategies (F-D-2-ii)  
Insert the following sentence at the end of section 1.4:  
*Having regard to Fiddown's position as a smaller town/ village in the County Settlement Strategy and its corresponding designation in the County Retail Hierarchy, the village functions as a local service centre to cater for the needs of the population of the village and its immediate environs.*  
*Fiddown is located in a Stronger Rural Area in accordance with the provisions of the Sustainable Rural Housing Guidelines, accordingly the Council will endeavour to promote the development of houses in Fiddown in accordance with its scale and character, thus providing an alternative to single dwellings in the countryside.*
- Section 2.2.1 Water Supply (F-D-2-v)  
Insert the following sentence at the end of the first paragraph of section 2.2.1:  
*Future development in Fiddown will be considered having regard to the availability of an adequate supply of potable water to service the development.*
- Section 2.2.1 Water Supply  
Delete:  
~~The Fiddown Piltown water supply scheme has been included for allocation of funding in the Water Services Investment Program for phases 1 & 2 of the upgrading works; these works are necessary to accommodate the natural increase and growth of the village as proposed in this plan.~~
- Amend last two paragraphs as follows:  
Water Quality Analyses over the years show that water quality in the area is good. Water quality is monitored on a daily basis by the Council's staff, in accordance with the HSE requirements to ensure that water quality remains high. ~~The lime content of the water is suitable for consumption, and whilst it solidifies when heated, cannot be readily removed from the water supply.~~
- A Water Conservation Project is underway across the county at present. The first stage of this project divided the water supply schemes into different zones and installed meters. The second stage is active leakage control, which includes detecting and repairing leaks. *A countywide mains rehabilitation & replacement programme is due to commence in 2011 as phase 3 of the project, thereby further reducing 'unaccounted for water'.*
- Section 2.2.3 Surface Water Drainage & Flood Risk Management (F-D-3-i-iv and F-D-2-vi)  
Deletions in ~~strike~~through, additions in italics:  
~~In line with *The Planning System and Flood Risk Management Guidelines for Planning Authorities* (2009) a Strategic Environmental Assessment Screening has been carried out for this plan. The Office of Public Works (OPW) has identified the levels of existing flood risk in and around the River Suir and its tributaries. In co operation with various Local Authorities within its catchment area, the OPW are conducting a '*Catchment Flood Risk Assessment and Management (CFRAM) Study*' of the entire catchment area, including lands at Fiddown. According to the existing OPW National Flood Hazard Mapping, there are no recorded flood events within the development boundary of Fiddown. The plan therefore accords with the guidelines' sequential approach in avoiding developing lands that may be vulnerable to flooding.~~

*In line with The Planning System Flood Risk Management Guidelines for Planning Authorities (2009) a Strategic Environmental Assessment Screening has been carried out for the Draft Fiddown Local Area Plan, and contains a Stage 1 & 2 Flood Risk Assessment; outline details of the Flood Risk Assessment are set out below:*

*Stage 1 – Flood Risk Identification*

*This stage of the flood risk assessment identifies whether there may be any flooding or surface water management issues relating to the plan area that warrant further investigation. A number of sources of information were consulted at this stage. It is noted that the area adjacent to the River Suir may be at risk of flooding, and a Stage 2 Flood Risk Assessment (FRA) was carried out.*

*Stage 2 – Initial Flood Risk Assessment*

*The purpose of the Stage 2 – Initial FRA is to ensure that all relevant flood risk issues are assessed in relation to the decisions to be made and potential conflicts between flood risk and development are addressed.*

*The scoping of the Catchment Flood Risk Assessment and Management (CRRAM) Study for the Suir Catchment identified Fiddown as an area of potential significant flood risk, however findings of the study are not available as the study is on-going and is expected to be completed in 2011.*

*The potential source of flooding in the area is from the River Suir. The Draft LAP for Fiddown has been prepared having regard to the flood risk issues in the plan area and land uses which would facilitate highly vulnerable development have not been zoned along the River Suir.*

*Policy*

- *‘Require that new development should not itself be subject to an inappropriate risk of flooding nor should it cause or exacerbate such a risk at other locations’.*

Section 2.3 Transport (deletions in ~~strike through~~, additions in italics)

2.3.1 Roads

Fiddown is centered around three roads (i) the old N24 which leads to the north to Piltown and the N24 Limerick - Waterford national route, and to the south across the River Suir into County Waterford, (ii) the Rathmore Road which now passes underneath the by-pass, and (iii) Strand Road leading to the amenity area by the river. Bordering the village to its north and east is the N24 national road from Waterford to Limerick which now by-passes the village.

By-pass

*The N24 Piltown-Fiddown by-pass was opened to traffic in January 2002. The Final Stage 3 Audit was undertaken by TMS Consultants in relation to the by-pass and the recommendations of this audit were implemented. A Road Safety Audit involves the evaluation of road schemes during design and construction to identify potential hazards that may affect any type of road user, and the appropriate measures to eliminate or mitigate any such hazards.*

~~The ‘2+1 System’ was introduced in 2006 and a Stage 3 Road Safety Audit was undertaken following the completion of the scheme, the recommendations of the audit were implemented. Since the introduction of the 2+1 System the feedback from An Garda Síochána has been extremely positive. A proposal has been approved by the NRA for works to be carried out, on a trial basis over a number of weeks, at the Piltown Tower Road exit to gradually reduce the width of the hard shoulder on approach from Carrick on Suir, having regard to the number of incidents occurring, and to improve traffic safety at this location.~~

*In 2006 as part of an NRA pilot programme a ‘2 plus 1 road’ scheme was implemented along the by-pass. The scheme generally consists of two lanes in one direction of travel and one lane*

*in the opposite direction. The two-lane section, which provides a safe overtaking zone, alternates with a one-lane section at intervals of approximately 2 kilometers. The traffic streams are separated by a safety barrier system. On completion of the scheme a Stage 3 Roads Safety Audit was undertaken. Since the introduction of the 2+1 System the feedback from An Garda Síochána has been extremely positive.*

*However, since the introduction of the 2 plus 1 road scheme, a number of side impact incidents have occurred at the Tower Road junction. Following an analysis of the accident type/cause and subsequent discussions with the NRA a proposal was put forward to the National Road Authority for approval and funding.*

*On foot of the NRA approval this proposal was introduced in the summer of 2010 on a 12 month trial basis. The said proposal eliminates the hard strip which was used as a non-standard deceleration lane along the inside road edge, by vehicles exiting the main road, thus, removing the risk of obstructed visibility for vehicles exiting the minor road. In addition the wide hatched area along the outside road edge was also removed, thereby, eliminating the potential of vehicles overtaking left turning vehicles on the approach to the said junction. The combined effect has resulted in through-vehicles having to slow down behind left turning vehicles, thereby affording road users exiting onto the major road a better opportunity to assess the gap in traffic that is available to them.*

Policy:

T2 - To work with the NRA in the provision of a safe transport route along the N24 national route.

Issues of concern raised in relation to the by-pass related to inadequate lighting, the height of the Rathmore Road under-pass, the length of the slip-way, crash barriers and signage at the beehive.

~~An appraisal of the by-pass by the Roads Section shows that the length of the slip-way is in accordance with the NRA Road Geometry Handbook; the under-pass was designed to facilitate car use only for local access to the village and its hinterland—emergency vehicles are required to use the grade separated junction a short distance to the west of the Rathmore Road. Regarding suggestions to provide additional lighting, it has been found that there are negative safety implications with lighting isolated junctions along national routes for road users travelling along the mainline.~~

~~An inspection of the signage near the beehive indicates that sightlines are sufficient, but that repairs will be required in relation to the crash barrier.~~

*An appraisal of the by-pass was undertaken by the Roads Section, it was confirmed that the length of the slip-way is in accordance with the NRA Road Geometry Handbook. It was also noted that the under-pass was designed for car use only to facilitate local access between the village and its hinterland and that it was always the case that Emergency Vehicles would have to utilise the grade separated junction a short distance to the west of the Rathmore Road. Regarding the request to provide additional lighting at junctions, it has been found that there are negative safety implications when lighting is provided at isolated junctions along national routes, this creates a situation whereby Road-users then have to adjust to travelling along a dark unlit section of road and then are forced to re-adjust to travel in an illuminated short section of road and then re-adjust back again to the dark, thereby causing added driver confusion.*

*An inspection of the signage near the beehive indicated that the sightlines are sufficient, but that repairs are deemed necessary in relation to the crash barrier.*

Objective:

T1 - To carry out works to repair the crash barrier at the by-pass near the beehive.

### 2.3.2 Traffic Management & Calming

Traffic volumes through Fiddown village have reduced since the opening of the N24 Piltown-Fiddown by-pass and the reclassification of the main road (old N24) to non-national road status. Traffic figures nationally have also reduced due to the economic down-turn and this is particularly the case of construction related bulk cargo vehicles.

However there are still a large number of vehicles travelling through the village, which appears, from local knowledge, to have increased with the opening of the new bridge in Waterford as vehicles may be using the village as an alternative route to avoid toll fees on the bridge.

~~A 24 hour survey was carried out to determine levels of speeding through the village, and found that average speeds were slightly above the speed limit, but that there was a high level of traffic travelling through the village. An assessment is required to ascertain the most appropriate traffic management system to secure the safe movement of pedestrians, cyclists and drivers through the village, and the feasibility of installing traffic calming measures.~~

*A 24 hour survey was carried out to determine levels of speeding through the village, the findings concluded that the average speeds were slightly above the posted speed limit, and that the traffic volumes travelling through the village were higher than expected. An assessment is required to ascertain the most appropriate traffic management system to secure the safe movement of pedestrians, cyclists and drivers through the village, and the feasibility of installing traffic calming measures.*

Objective:

T3 - To carry out an assessment and implement a traffic management system to secure the safe movement of pedestrians, cyclists and drivers through the village, having regard to the need criteria and financing.

A build-out has been constructed at the Toll Bridge House to prevent damage to the house. Concern has been raised about the ability of heavy goods vehicles to manoeuvre around the build-out and that it brings vehicles closer to the wall at the chapel which is under stress. ~~The Council will endeavour to carry out a swept path analysis at the junction of the bridge with the former N24 road, when resources allow.~~

*In co-operation with Waterford County Council, joint improvement works have been undertaken on Fiddown Bridge. The works consisted of pavement and parapet restoration.*

The wall at the chapel, which is a protected structure and recorded monument, is suffering damage due to a number of factors; an examination of the options to carry out works to prevent further works should be undertaken.

#### Section 2.5.1.3 Habitats of Ecological Significance (F-D-2-xiii)

~~H3 - To ensure that any development in or near sites of local conservation interest, as identified in Table 3 of Appendix 1, will minimise any significant adverse impact on the features for which the sites has been designated.~~

~~H4 - Applicants shall demonstrate that there will be no adverse impacts on the ecological integrity of sites of high ecological value identified in this plan from developments on adjacent sites.~~

*H3 - Ensure that development in or near sites of local conservation interest, as identified in Table 3 of Appendix 1, will not have any significant adverse impacts on the ecological integrity of the site, or the features for which the site has been designated.*

Section 2.5.3 Built Heritage

Alterations which would *materially* affect the character of a protected structure will require planning permission. *Advice can be obtained by consulting with Kilkenny County Council's Conservation Officer. Further guidance is available in Chapter 8: Heritage of the County Development Plan 2008.* ~~and should be the subject of early consultation with Kilkenny County Council's Conservation Officer and/or the Architectural Heritage Advisory Unit of the Department of the Environment, Heritage and Local Government. Generally, all repair and maintenance works should be carried out on a 'like for like' basis and in accordance with the Architectural Heritage Protection Guidelines 2004, published by the Department of the Environment, Heritage and Local Government.~~

Section 2.6.1 Open Space, Walkways & Tourism Potential (F-D-2-x)

Insert the following policy in section 2.6.1:

*To protect the integrity of the river corridor both in terms of its designation as a cSAC and important wildlife habitat as well as an important landscape feature. Any proposed developments that have the potential to impact on a Natura 2000 site will be subject to a project level appropriate assessment. No projects giving rise to significant adverse direct, indirect or secondary impacts on the integrity of any Natura 2000 sites shall be permitted on the basis of this Plan (either individually or in combination with other plans or projects).*

Replace the word 'should' with 'shall' in the following sentence (last paragraph, p26).

Works within the aforementioned areas ~~should~~ *shall* only be carried out in consultation with the Department of the Environment, Heritage and Local Government and Kilkenny County Council having regard to designations in these areas as pNHA, cSAC and area of archaeological potential.

Section 2.6.2 Amenity Enhancement – General Appearance

~~Efforts are being made to ensure the satisfactory completion of residential development in the area in line with planning permissions granted.~~

*The Council's Planning Enforcement Section is working to ensure the satisfactory completion of residential developments in the area in line with planning permissions granted.*

Table 3 Objectives for the plan area

AS1 – wording of AS4 was inserted, replace with wording of AS1 – 'To retain and protect the views to the River Suir from the R698 and Strand Road, and to retain the character of this area'.

- Miscellaneous
- Remove word 'Draft' from Draft Regional Planning Guidelines 2004-2010, as they have been adopted, since publication of draft plan (pages 5 & 8).
  - Section 1.3, page 4 alter as follows: In the last ten years, the core of the village has expanded to the north-west to include several residential development and the ~~Day-break~~ shop . . .
  - Objective H1 – replace 'or' with 'of' in second last line.
  - Page 35, section 3.3.6 delete '0' replace with bracket.
  - Map 2 delete 'Piltown' replace with 'Fiddown'.
  - Map 3 omit reference '14'



### 3.0 Proposed Material Alterations to Fiddown Draft LAP Appropriate Assessment Screening Report

- Insert following wording under heading ‘Describe any likely direct, indirect or secondary impacts of the project (either alone or in combination with other plans or projects) on the Natura 2000 sites by virtue of: resource requirements (water abstraction etc.)’. (F-D-2-ix)

*The Mooncoin Regional Water Supply Scheme will have a positive impact on the Fiddown-Piltown water supply scheme, which is currently at capacity. An Board Pleanala approved groundwater abstraction from four well fields (reference 10.JA0009) subject to a number of conditions including a restriction of the maximum abstraction from the combined well-fields to 12,000 m<sup>3</sup>/day in order to safeguard groundwater in the area (condition 1) and imposed condition 3 on Kilkenny County Council to install hydrometric weirs to monitor the flow of the Blackwater and Pil rivers while abstraction is taking place, to establish a relationship between the surface water levels and the abstraction.*

*An application for an amendment to condition 1 was made in December 2009 which has not yet been decided (reference PL10.JM0003); the application for this amendment contains further information gained following well drilling and yield testing. It is requesting an increase in abstraction to 16,000m<sup>3</sup>/day. The report submitted to An Bord Pleanala (Mooncoin Regional Water Supply Scheme Results of Exploratory Well Drilling and Yield Testing - Submission To An Bord Pleanala) prepared by RPS consultants states ‘As a result of the wellfields abstracting, no groundwater gradients have been reversed other than in close proximity to the well-fields therefore the groundwater flow direction remains similar’; also ‘monitoring of surface water levels was undertaken in the Pil River during the multi-well test at Silversprings and in the River Blackwater during the multi-well test at Kilmacow. The flow monitoring indicated no impact on surface water flow on the River Blackwater or the Pil River during the multi-well tests which were carried out at significantly higher abstraction rates than proposed for the operation of the scheme at 16,000m<sup>3</sup>/d’ (p47). The EIS submitted relates to all phases of the scheme, from which the settlements of Fiddown and Piltown will benefit. The full impact of likely demand from Piltown and Fiddown was taken into account in the water supply demand, therefore implementation of the plan will have no direct, indirect or secondary impacts.*
- Insert the following wording at Step 3(a) Lower River Suir cSAC ‘Describe any likely changes to the sites arising as a result of – disturbance to key species’. (F-D-2-x)

*There is potential for disturbance to designated species from proposed amenity actions in the plan; however the plan also contains a number of policies to ensure the protection of designated species, including the statement that ‘works within the aforementioned areas shall only be carried out in consultation with the Department of the Environment, Heritage and Local Government and Kilkenny County Council having regard to designations in these areas as pNHA, cSCA and areas of archaeological potential’.*

A proposed amendment to the draft plan will include the following policy in section 2.6.1:  
*To protect the integrity of the river corridor both in terms of its designation as a cSAC and important wildlife habitat as well as an important landscape feature. Any proposed developments that have the potential to impact on a Natura 2000 site will be subject to a project level appropriate assessment. No projects giving rise to significant adverse direct, indirect or secondary impacts on the integrity of any Natura 2000 sites shall be permitted on the basis of this Plan (either individually or in combination with other plans or projects).*
- Insert the following wording under the heading ‘Describe any likely impacts on the Natura 2000 sites as a whole in terms of: - interference with the key relationships that define the structure of the sites; - interference with key relationships that define the function of the site’. (F-D-2-xi)

*Developments in the plan area will be required to comply with the standards, policies and objectives of the plan. The plan contains policies and objectives to protect both designated sites and sites outside of designated areas; it is therefore not anticipated that developments in the plan area will have significant adverse effects on a Natura 2000 site.*

#### 4.0 Proposed Material Alterations to Fiddown Draft LAP Strategic Environmental Assessment Screening Report

- Insert the following wording under section 6.2 (ii) 'The cumulative nature of the effects' (F-D-2-ix)
- The Mooncoin Regional Water Supply Scheme will have a positive impact on the Fiddown-Piltown water supply scheme, which is currently at capacity. An Board Pleanala approved groundwater abstraction from four well fields (reference 10.JA0009) subject to a number of conditions including a restriction of the maximum abstraction from the combined well-fields to 12,000 m<sup>3</sup>/day in order to safeguard groundwater in the area (condition 1) and imposed condition 3 on Kilkenny County Council to install hydrometric weirs to monitor the flow of the Blackwater and Pil rivers while abstraction is taking place, to establish a relationship between the surface water levels and the abstraction.*
- An application for an amendment to condition 1 was made in December 2009 which has not yet been decided (reference PL10.JM0003); the application for this amendment contains further information gained following well drilling and yield testing. It is requesting an increase in abstraction to 16,000m<sup>3</sup>/day. The report submitted to An Bord Pleanala (Mooncoin Regional Water Supply Scheme Results of Exploratory Well Drilling and Yield Testing - Submission To An Bord Pleanala) prepared by RPS consultants states 'As a result of the wellfields abstracting, no groundwater gradients have been reversed other than in close proximity to the well-fields therefore the groundwater flow direction remains similar'; also 'monitoring of surface water levels was undertaken in the Pil River during the multi-well test at Silversprings and in the River Blackwater during the multi-well test at Kilmacow. The flow monitoring indicated no impact on surface water flow on the River Blackwater or the Pil River during the multi-well tests which were carried out at significantly higher abstraction rates than proposed for the operation of the scheme at 16,000m<sup>3</sup>/d' (p47). The EIS submitted relates to all phases of the scheme, from which the settlements of Fiddown and Piltown will benefit. The full impact of likely demand from Piltown and Fiddown was taken into account in the water supply demand, therefore implementation of the plan will have no direct, indirect or secondary impacts.*

- Replace part of the wording of section 1.5 as follows (F-D-3-i-iv and F-D-2-vi)
- Deletions in ~~strike through~~, insertions in *italics*:
- ~~In line with the Guidelines on Flood Risk Management, a staged approach has been adopted to the appraisal and assessment of flood risk. Stage 1 of this appraisal is Flood Risk Identification which includes a review of existing information. No Regional Flood Risk Appraisal has been carried out to date. A Strategic Flood Risk Assessment has not been carried out to date for the CDP, nor has a SFRA been carried out for the Fiddown LAP previously.~~
- ~~The Office of Public Works (OPW) has identified the levels of existing flood risk in and around the River Suir and its tributaries. In co-operation with various Local Authorities within its catchment area, including Kilkenny County Council, the OPW are currently conducting a 'Catchment Flood Risk Assessment and Management (CFRAM) Study' of the entire catchment area which covers approximately 3,520km<sup>2</sup> including lands at Fiddown.~~
- ~~According to the OPW National Flood Hazard Mapping, there are no recorded flood events in Fiddown, but flooding has occurred in Piltown to the north of Fiddown.~~

*In line with The Planning System Flood Risk Management Guidelines for Planning Authorities (2009) a Strategic Environmental Assessment Screening has been carried out for the Draft Fiddown Local Area Plan, and contains Stages 1 & 2 of a Flood Risk Assessment; details of the Flood Risk Assessment are set out below:*

*Stage 1 - Flood Risk Identification.*

*This stage of the flood risk assessment identifies whether there may be any flooding or surface water management issues relating to the plan area that warrant further investigation. A number of sources of information were consulted at this stage including:*

- *The South East Regional Planning Guidelines 2010-2022 and its associated Flood Risk Appraisal carried out as part of the SEA,*

- *Ordnance Survey Historical Mapping,*
- *Kilkenny County Development Plan 2008-2014,*
- *OPW National Flood Hazard Mapping and associated recorded reports and photographs,*
- *River Pil Preliminary Flood Risk Assessment,*
- *Public consultation,*
- *Water Matters – South Eastern River Basin Management Plan (2009-2015),*
- *EPA website soils dataset, created by the Spatial Analysis Unit Teagasc,*
- *OPW Report on Flooding Piltown County Kilkenny (February 2001).*

*From these sources of information it is noted that the area adjacent to the River Suir may be at risk of flooding.*

*As a Flood Risk issue has been identified on lands within the proposed development boundary the Flood Risk Assessment proceeds to Stage 2.*

#### *Stage 2 – Initial Flood Risk Assessment*

*The purpose of the initial FRA is to ensure that all relevant flood risk issues are assessed in relation to the decisions to be made and potential conflicts between flood risk and development are addressed.*

*A number of sources of information are not as yet available –*

*(a) the Department’s guidelines were published after the adoption of the County Development Plan, and a county-wide FRA has not been prepared, and,*

*(b) the scoping of the CFRAMS for the Suir Catchment identified Fiddown as an area of potential significant flood risk, however the findings are not as yet available as the study is on-going and is expected to be completed in 2011.*

*Although these sources are not currently available it is considered that the information from the sources outlined in Stage 1 provide adequate information to carry out the FRA.*

- *The Ordnance Survey historical maps show ‘mud’ along the banks of the Lower River Suir in areas proposed to be zoned for open space.*
- *EPA website soils dataset, created by the Spatial Analysis Unit Teagasc shows alluvium along the banks of the River Suir.*
- *The OPW National Flood Hazard Mapping does not identify any benefiting lands in the development boundary area, although an area of benefiting lands is identified to the north-west of the plan area. No flood incidents have been recorded in the area.*

#### *Source – Pathway – Receptor Model*

- *Source: The River Suir, which is tidal, is the potential source of flooding in the area.*
- *Pathways: Over-bank – if the River Suir over-tops its banks.*
- *Receptors: People & Property (predominately agricultural lands).*

*Public consultation was carried out in the preparation of the draft plan; flooding was not identified as a concern in Fiddown.*

#### *Sequential Approach*

*The Draft LAP for Fiddown has been prepared having regard to the flood risk issues in the plan area. A number of steps have been taken to lessen the impacts of potential flooding in the plan area and the Sequential Approach has been adapted as follows:*

- *Avoid*

*Lands have not been zoned for vulnerable uses in the vicinity of the River Suir.*

- *Substitute*

*Zoning – a habitat assessment was carried out by consultants as part of the research for the plan; the assessment identified ecological network areas, primarily located along the River Suir and this area which forms part of the cSAC has been designated as ecologically important and has been primarily designated as*

*open space (land uses within this area will be subject to ecological assessment in accordance with the policies in the plan to ensure the ecological integrity of the area is maintained).*

- *Justify*

*Integrated Tourism and Leisure:*

*There is an existing land use adjacent to the river which has been used for Oil storage and parking of vehicles. In order to facilitate uses suited to the river, a zoning for integrated tourism and leisure has been proposed; this land use would facilitate development which would be considered 'less vulnerable' or 'water-compatible' development.*

*The following policy has been included in the Draft Plan:*

- *IN7 – To seek separate stormwater systems for all developments, and to consider all proposals consistent with SuDS (Sustainable Drainage Systems).*

*In order to ensure that uses adjacent to the river should not increase flood risks, the following policy will be included in the Draft plan:*

- *'Require that new development should not itself be subject to an inappropriate risk of flooding nor should it cause or exacerbate such a risk at other locations'.*

### *Stage 3 – Detailed Flood Risk Assessment*

*Stages 1 and 2 of the Flood Risk Assessment have identified the sources, pathways and receptors of flood risk in the Draft Fiddown LAP. The Sequential Approach has been followed to ensure that development is directed towards areas that are at a low risk of flooding. Mitigation measures in the form of pro-active policies and objectives are proposed in relation to flooding in the plan area. Having regard to the foregoing it is not considered necessary to proceed to Stage 3 Detailed Flood Risk Assessment with regard to the proposed Fiddown Local Area Plan.*