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Sent: Monday 28 March 2022 14:07
To: Development Plan
Subject: CDP

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I would like to thank you for this opportunity to provide input on the draft of the County Development Plan 2023-2029 (CDP). While I welcome the priority given to climate and climate action and also the inclusion of an entire chapter on climate action for the first time in the CDP, I am very worried about the consequences for biodiversity in Ennis Town Centre should certain aspects of the Ennis 2040 Economic & Spatial Strategy come into fruition, namely the development of Ennis Post Office Field.

- Part 2.6.2 of the Draft 'Infrastructure and the Built Environment' states, 'The Strategy requires that the Council ensure the resilience to climate change of infrastructural assets and that all future investment decisions and development proposals are informed by climate change issues. This is to be achieved through the identification, quantification and resolution of climate related risks so as to protect key assets from service disruption.' Given that Ennis Post Office Field is a natural flood plain I believe that its development would be ill-advised considering the increased risk of floods as a result of climate change.
- Chapter 15 'Biodiversity, Natural Heritage and Green Infrastructure' lists Development Plan Objective: Non-Designated Sites and Biodiversity with an objective to 'ensure the protection and conservation of areas, sites, species and ecological networks/corridors of biodiversity value outside of designated sites throughout the County and to require an ecological assessment to accompany development proposals likely to impact on the area or species'. I believe that Ennis Post Office Field should be considered under this objective.
- Chapter 15 also describes Development Plan Objective: Biodiversity and Habitat Protection with an objective to 'promote the conservation of biodiversity through the protection of sites of biodiversity importance and wildlife corridors, both within and between the designated sites and the wider Plan area'. Ennis Post Office Field is an island of biodiversity within a very built-up area and is a nesting area for waterfowl along the River Fergus.
- NATURA 2000 is the ecological network for the conservation of wild animals and plant species and natural habitats of community importance within the European Union. It consists of sites classified under the Birds Directive and the Habitats Directive (the Nature Directives). The River Fergus is a Special Protection Area under this directive. Given that the river regularly covers the surface area of the Post Office field the directive extends to the entirety of the field.

It is for these reasons I recommend that references to the development of Ennis Post Office Field as described in the Ennis 2040 Economic & Spatial Strategy (ref TS3) and as referenced in Volume 3a of the Draft County Development Plan be removed and that the site be recognised as being a part of the River Fergus SPA and preserved.

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