



**Administrative Officer,
Review of County Development Plan,
Forward Planning Department,
Áras An Chontae,
Great Water Street,
Longford
N39 NH56**

13/01/2021

RE: Draft Longford County Development Plan 2021 - 2027

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 Draft Longford County Development Plan 2021 - 2027.

The OPW welcomes the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines' and the proposed measures set out in the Flood Risk Management Plans (FRMPs) based on the work undertaken for the CFRAM Programme, and the preparation of a Strategic Flood Risk assessment (SFRA). In particular, the OPW welcomes:

- The commitment to address surface water flooding issues and the need for SuDS (Objectives CPO 5.90, 5.92 and 5.93)
- The recognition of the potential impacts of climate change on flood risk and the need to address these impacts (Objective CPO 3.1, 3.4 and 5.107)
- The commitments to managing flood risk in line with the Guidelines and the measures set out in the FRMPs (Objectives CPO 5.95 – 5.109).

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

Sequential Approach

The Guidelines highlight the need for a Sequential Approach to managing flood risk, using mapped flood zones alongside considerations of the vulnerability of different types of development to give priority to development in zones of low flood probability. Only if there are no reasonable sites available in zones of low flood probability should consideration be given to development in higher flood probability zones. It would appear that land use zoning within Flood Zones that would be considered inappropriate or require application of the Justification Test, in accordance with Table 3.2 of the Guidelines, has been proposed in a number of settlements, as detailed in the Comments on Specific Settlements section below.

Justification Test



The Justification Test as set out in the Guidelines does not appear to have been applied or reported in the preparation of the Draft Development Plan. Please note that the Justification Test applies only to the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions), and would not be applicable to the periphery of urban areas.

Proposed land use zones within Flood Zones A and B are shown in the settlement zoning maps, some of these zone types are classified as Highly vulnerable development in the Guidelines. Examples of these are detailed in the *Comments on Specific Settlements* section below.

No commentary has been provided to demonstrate that the Justification Test has been applied in proposing vulnerable development zoning within Flood Zones A and B.

Constrained Land Use Zoning

The OPW welcomes that flood zone mapping has been included in the settlement zone maps for larger settlements, as zoning type *Constrained Land Use*, and Objective 5.108, that the management of flood risk in this zone type will be facilitated by Longford County Council. The County Development Plan further outlines that developments within this zone will require a detailed flood risk assessment. It would be beneficial if the *Constrained Land Use* zoning could also be used for Rural Settlements to highlight the lands at flood risk and require a flood risk assessment in these smaller settlements.

Sustainable Drainage Systems (SuDS)

The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites.

The Guidelines recommend that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Consideration of Climate Change Impacts

The potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives.

Arterial Drainage Schemes and Drainage Districts

Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The location of Arterial Drainage Schemes and Drainage Districts may be viewed on www.floodinfo.ie.

Specific Comments



Abbeyshrule

It is suggested that potential sites within the established residential area could be developed with new small scale residential or other residential amenities such as schools, crèches, small shops, doctor's surgeries, playing fields, etc. These potential sites have not been identified within the plan. There are undeveloped lands within the *Residential* zoning which are within Flood Zone A and Flood Zone B and some of these types of development would be considered inappropriate in Flood Zone A or Flood Zone B.

Aughnacliff

The *Constrained Land Use* zoning has been omitted from the Zoning and Flood Map. Without the zoning on the map it is difficult to establish if the *New Residential* and *Strategic Residential Reserve* zonings overlap with Flood Zone A or B. If the zonings are within Flood Zone A or B, then a Plan making Justification Test should have been supplied. If the zonings are adjacent to Flood Zone A or B, then the lands may become vulnerable to flooding when climate change is taken into account. Longford County Council might consider requiring these sites to carry out a site specific FRA.

Ballinamuck

A *New Residential* site is situated within the Drainage District Benefited Land Map. The land may be prone to flooding, and a site-specific flood risk assessment may be required.

An undeveloped *Town Core* site is partially within Flood Zone A and some types of Town Core development may be inappropriate in Flood Zone A, subject to application of the Justification Test.

Ballymahon

There are *Strategic Residential Reserve* sites located within Flood Zone B, and Highly Vulnerable development is considered inappropriate in Flood Zone B.

An undeveloped *Social/Community/Public Utility* site is situated within the OPW Arterial Drainage Benefited Land Map. The land may be prone to flooding, and a site-specific flood risk assessment may be required.

Carrickglass

There are undeveloped *Development Envelope* lands located within Flood Zone A and B. This zoning type is for small scale residential and limited local level services such as post offices, neighbourhood shops, schools etc. Some of these developments are Highly Vulnerable and Vulnerable developments are considered inappropriate for Flood Zone A and B.

Clondra

The *Tourism/Mixed Use with Provision of Marina* site is to provide for mixed use and marina development, including residential uses, compatible social and community facilities, local shopping and commercial facilities, recreational facilities, open spaces and supporting tourism



development. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B.

Drumlish

Through the groundtruthing exercise an area prone to flooding was identified to the South western end of the town and has been designated as Flood Zone A. Zonings in this area, *Strategic Residential Reserve*, *Site Resolution Objective* (redevelopment for the community and residents needs including housing), *Industrial/Commercial/Warehousing* and *Strategic Industrial Reserve* sites are located within Flood Zone A. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B.

Edgeworthstown

There is a *Strategic Residential Reserve* site located partially within Flood Zone A and Highly Vulnerable development is considered inappropriate in Flood Zone A and B.

Granard

Through the groundtruthing exercise lands at risk of flooding and poorly drained were identified and has been designated as Flood Zone A. Zonings in this area, *Town Core*, *Industrial/Commercial/Warehousing* and *Transport & Utility Objective* (new relief road to bypass the town) sites are located within Flood Zone A. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B.

Commentary on the groundtruthing for Granard, also notes that cottages to the west of Parnell Row have previously flooded. The OPW has no record of this flood event in the Past Floods Database and would request Longford County Council to submit a flood event report to floodinfo@opw.ie.

Lanesborough

Industrial/Alternative Energy and *Industrial/Commercial/Warehousing* sites are located in Flood Zone A. Highly Vulnerable is considered inappropriate in Flood Zone A and B and Vulnerable development inappropriate in Flood Zone A.

Legan

Strategic Residential Reserve sites are partially located within Flood Zone A. and Highly Vulnerable development is considered inappropriate in Flood Zone A and B.

Sites adjacent to Flood Zones may become vulnerable to flooding when climate change is taken into account. Longford County Council might consider requiring these sites to carry out a site specific FRA.

Longford



Industrial Commercial and Site Resolution Objective (redevelopment for the community and residents needs including housing) sites are located within Flood Zone A. Some of these developments are Highly Vulnerable and are considered inappropriate for Flood Zone A and B.

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 Longford County Development Plan 2021 - 2027.

Yours sincerely,

pp Mark Adamson
Flood Relief and Risk Management Division

