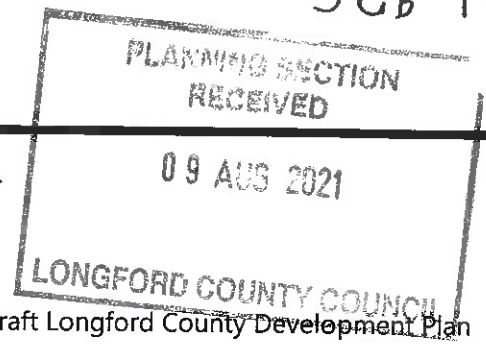


SUB 19



Anne Glancy

From: Flood Planning <floodplanning@opw.ie>
Sent: Monday 9 August 2021 14:25
To: cdp
Cc: Niall Murphy
Subject: EXTERNAL - Material Alterations to the Draft Longford County Development Plan 2021 to 2027
Attachments: 210723_Observations Material Alterations Longford CDP 2021-2027.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.

Dear Sir / Madam,

Please find attached, the comments from the OPW on the Material Alterations to draft Longford County Development Plan 2021 – 2027.

Please send official acknowledgement of receipt of this email and attachment to the above email address.

Regards,

Floodplanning@opw.ie

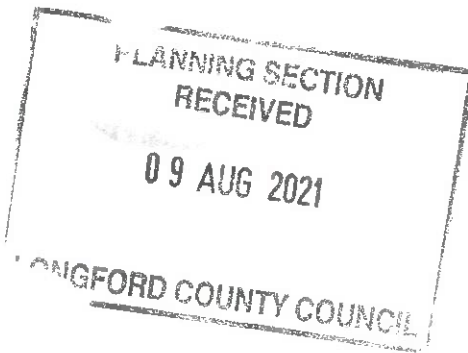
Email Disclaimer: <https://www.gov.ie/en/organisation-information/439daf-email-disclaimer/>



Oifig na
nOibreacha Poiblí
Office of Public Works



Forward Planning Unit,
Longford County Council,
Áras An Chontae,
Great Water Street,
Longford,
N39 NH56



23/07/2021

RE: Material Alterations to the Draft Longford County Development Plan 2021 - 2027

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Material Alterations to the Draft Longford County Development Plan 2021 – 2027.

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. 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. The 'Comments on Specific Settlements' section below, details those that are proposed in the Plan.

Plan-making Justification Tests

Lands that are predicted to be at risk from flooding are still zoned for development. The Chief Executive's Report states "*This requirement did not arise as the levels of flood risk identified by the SFRA were a key informant of land uses in undeveloped areas in Flood Zones A and B. Only appropriate land uses are being proposed for previously undeveloped lands within Flood Zones A and B*". Examples of lands zoned for highly vulnerable or less vulnerable in flood risk lands are provided in 'Comments on Specific Settlements' section below.

The Guidelines set out that, at the Plan-making stage, land use zoning be informed by the suitable level of FRA and if necessary a Justification test. Chapter 5 of the Guidelines set out that "*most flood risk issues should be raised within strategic assessments undertaken by local authorities at the plan-making stage. Therefore, as more plans are reviewed and zoning reconsidered, there should be less need for development management processes to require detailed flood risk assessment*".

52 Faiche Stiabhna, Baile Átha Cliath 2, D02 DR67

52 St. Stephen's Green, Dublin 2, D02 DR67

T +353 1 647 6000 | info@opw.ie

www.opw.ie



As flood risk assessments are integrated with the SEA process, Section 3.10 of the Guidelines also highlights the need that FRA's be "undertaken as early as possible in the process so that the SEA is fully informed of the flood risks and impacts of the proposed zoning or development".

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.

If it is the case that these sites are already developed then Circular PL 2/2014 provides further advice and detail to planning authorities on older developed areas of towns and cities located in Flood Zone A and B. "Where the planning authority considers that the existing use zoning is still appropriate, the planning authority must specify the nature and design of structural or non- structural flood risk management measures required prior to future development in such areas, in order to ensure that flood hazard and risk to the area and to other adjoining locations will not be increased, or if practicable, will be reduced".

Proposed Amendment SFRA.1.2 proposes the addition of Table 6: Justification of the Constrained Land Use Approach for Previously Developed Lands. It appears that the table covers a settlement as opposed to a review of an existing zonings within the settlement. All five points to criteria 2 of the Justification Test do not appear to have been assessed, all points must be satisfied. The SFRA recommendation integrated into the Plan for management of risk notes the relevant policies and development management standards for Criteria 3.

Objective CPO 5.108 is referenced, which covers that the *Constrained Land Use* zoning provisions may apply. However, for these existing developed site / zoning the *Constrained Land Use* does apply and development is therefore limited to minor development, then this could be clearly stated here within this table with the reference to DMA 16.205 Structural and Non-Structural Risk Management Measures in Flood Vulnerable Zones. There is also a reference to DMS 16.204 Flood Zones and Appropriate Land Uses, which states that 'Where developments/land uses are proposed that are considered inappropriate to the Flood Zone, then a Development Management Justification Test and site-specific Flood Risk Assessment will be required'. This objective is not in keeping with the Guidelines as it bypasses the requirement for a Plan-making Justification Test. Finally, there is no overall conclusion if the Justification Test has been satisfied.

Table 6: Justification of the Constrained Land Use Approach for Previously Developed Lands¹

Settlements	Are lands that have been already developed within Flood Zone A and/or B?	Is the settlement targeted for growth under the RSES, existing CDP and Draft CDP?	Is the zoning of the lands required to achieve the proper planning and sustainable development of the settlement?	SFRA recommendation integrated into the Plan for management of risk?
Abbeysrule	Yes, within existing settlement envelope	Yes	Yes, would contribute towards overall sustainable,	Yes, including CPO 5.108, CPO 5.99, DMS16.204 and DMS16.205

Proposed Amendment SFRA.1.2



For sites that are intended to be zoned for development following the application of a Justification Test, where only a small proportion of the site is at risk of flooding, a policy objective might be attached to such zoning. Such an objective might require that the sequential approach be applied in the site planning, whereby to ensure no encroachment onto, or loss of, the flood plain, only water compatible development such as *Open Space* would be permitted for the lands which are identified as being at risk of flooding within that site. Planning permission for these sites might then be subject to the sequential approach having been adopted and applied, following a detailed FRA.

Policy Objectives

Proposed Amendment CH5.27, includes the addition of text that a site-specific Flood Risk Assessment may be required for Flood Zone C. It should be noted that the flood zones maps should not be used to suggest that any areas are free from flood risk, since they do not include the effects of other forms of flooding such as from groundwater or artificial drainage systems. All flood zones are subject to FRA of flood hazard from other sources, which should assess all potential sources of flooding that may affect the site – from rivers and the sea, streams, surface water run-off, sewers, groundwater, reservoirs, canals and other artificial sources or any combination of these.

National Indicative Fluvial Mapping (NIFM)

The OPW acknowledge that National Indicative Fluvial Mapping outputs were not available at the time of development of this Plan. The outputs are now available on request to Local Authorities.

The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, may be obtained in GIS format from the OPW Flood Risk Management - Data Management Section via email (flood_data@opw.ie).

While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed. Please note that NIFM mapping does not cover catchments that were smaller than 5km².

Consideration of Climate Change Impacts

The OPW welcomes the inclusion of the CFRAM Mid-Range Future Scenario (MRFS) flood extent mapping for the County, however it would be more beneficial if maps were supplied for each settlement to allow the identification of sites/lands vulnerable to climate change. The CFRAM Programme and the NIFM Project produced mapping for the High-End Future Scenario (HEFS).

The OPW recommend that the Draft Plan details how climate change has been considered in the production of this development plan. The Guidelines state that a precautionary approach to climate change should be applied and a cautious approach to zoning in potential transitional areas. 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

The OPW had previously commented on the Draft Plan that applications for development on land identified as benefitting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The CE Report in relation to this notes the Council's policy to support the implementation of the Guidelines and Circular PL2/2014, as well as referencing Policy Objectives CPO 5.97 and CPO 5.98, which are the Council's policies to support these. However, Arterial Drainage Schemes and Drainage Districts datasets are not used in the production of flood zones and lands which are not in a flood zone may be in a benefitting land area. The location of Arterial Drainage Schemes and Drainage Districts have been identified in the Historical Indicator maps in the SFRA and may also be viewed on www.floodinfo.ie.

SuDS and Natural Water Retention Measures

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, and also 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.

Specific Comments on Specific Settlements

Longford

The OPW welcomes the proposed alterations to the settlement map to dezone flood risk lands.

Grandard

The OPW welcomes the proposed alterations to the settlement map to dezone flood risk lands. However, the proposed relief road still passes through Flood Zone A and a Plan-making Justification Test would still be required. Highly vulnerable development, including essential infrastructure, is not appropriate in Flood Zone A and B and less vulnerable development, including local transport infrastructure, is not appropriate in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied.

Ballymahon

The de zoning of *Strategic Residential Reserve* sites located within Flood Zone B is welcomed by the OPW.

Edgeswothtown

The OPW welcomes the rezoning of *Strategic Residential Reserve* zoning which was located partially within Flood Zone A as *Recreational/ Amenity/ Green Space*.

Lansborough

The OPW welcomes the proposed alterations to the settlement map to dezone flood risk lands.



Aughnacliff

The *Constrained Land Use* zoning with the Zoning Map has been supplied and the OPW welcomes that a portion of the *New Residential* zoning, which was at flood risk, is proposed to be de-zoned.

Drumlish

The OPW welcomes the proposed alterations to the settlement map to dezone flood risk lands.

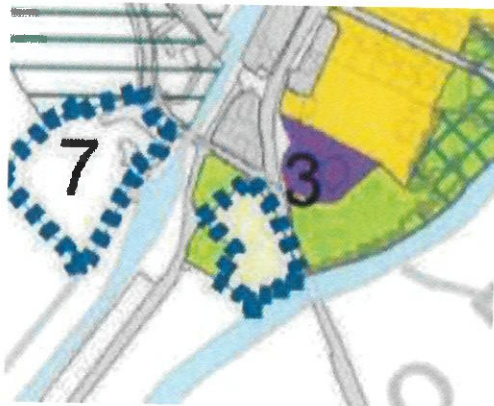
Legan

The de-zoning of *Strategic Residential Reserve* partially located within Flood Zone A is welcomed by the OPW.

Abbeyshrule

The de-zoning of potential sites within the established *Residential* area is welcomed by the OPW.

It is proposed to rezone parcel no. 3 from *Recreation/ Amenity/ Green Space* to *New Residential*, it can be seen from the previous land use zoning map that this site is slightly within the *Constrained Land Use* zoning. Please note the 'Plan-making Justification Tests' section above in relation to sites where only a small proportion of the site is at risk of flooding. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied.



Parcel No 3 Proposed to be rezoned as New Residential



Parcel No 3 Previously zoned as Recreation/ Amenity/ Green Space and slightly within the Constrained Land Use

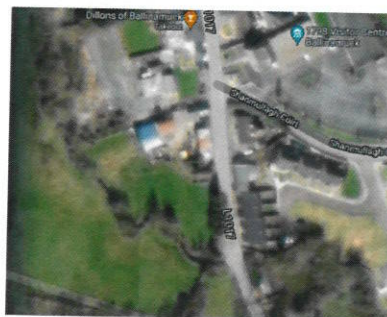


Ballinamuck

There is still an area of undeveloped *Town Centre* lands partially located in Flood Zone A. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied.



Undeveloped Town Centre lands partially located within Constrained Land Use



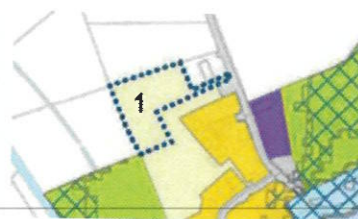
Undeveloped Town Centre lands partially located within Constrained Land Use

Clondra

Proposed Amendment SFRA.1.1 in Volume 4: Environmental & Flood Reports states “*One Proposed Material Alteration (Residential extension northwards from Draft Plan Clondra plan area – refer to SEA Environmental Report on Proposed Material Alterations for more detail) would not be in compliance with the Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014. Further modification would be required to this change to avoid the Flood Zone*”. The detail provided in the SEA Environmental Report on Proposed Material Alterations is that “*Proposed Material Alteration Reference AP.1E.18 does not comply with the Guidelines as it proposes incompatible New Residential Zoning in an area of elevated flood risk that would fail the Justification Test under the Guidelines*”. This appears to refer to parcel No. 1, which proposes extending the settlement boundary for *New Residential* zoning. The *Constrained Land Use* zoning was not updated on the revised map for Clondra. *New Residential*, classified as highly vulnerable development type, has been zoned in a flood risk area. Highly vulnerable development is not appropriate in Flood Zone A and B, and less vulnerable development is not appropriate in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied. If all three criteria of the Plan-making Justification Test cannot be satisfied then the site should be rezoned as *Open Space*.



Previous land zoning with SFRA, Flood Zone Map constrained land use zoning



Proposed New Residential zoning with previous constrained land use zoning



The OPW welcomes the dezoning of *Tourism/Mixed Use with Provision of Marina* sites, which had allowed 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 classified as 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,

_____*Niall Murphy*_____

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments