



Forward Planning,
Planning Department,
Longford County Council,
Áras an Chontae,
Great Water Street,
Longford,
N39 NH56

14/10/2024

RE: Longford Town Draft Local Area Plan 2025 - 2031

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Longford Town Draft Local Area Plan for the period 2025 – 2031.

This submission is made specifically concerning flood risk management. Further submissions on the Issues Paper may be made by the OPW concerning the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes:

- Policy Objective FR03 which requires that developments in flood vulnerable areas comply with development management standards set out in the county development plan, and also provide details on structural and non structural risk management measures including but not limited to specifications of floor levels, internal layout, flood resilient construction, flood resistant construction, emergency response planning, access and egress during flood events.
- Policy Objective FR04 which requires that future development not result in increased risk of flooding elsewhere, restrict flow paths, where compensatory storage / storm water retention measures shall be provided on site.

Flood Zone Map

It would be beneficial if a Flood Zone map showing Flood Zones A and B overlaid on Land Use Zonings were included.

Longford Town Flood Relief Scheme

The Longford Town Flood Relief scheme currently being progressed by Longford County Council is referenced in section 9.3 of the written statement with respect to regeneration opportunities. Policy objectives included in the county development plan such as CPO 5.106, CPO 5.107, and CPO 5.114 will provide support to the development of this scheme. Longford County Council might consider the inclusion of a specific objective in this regard in the Draft Local Area Plan, to ensure that zoning or development proposals support and do not impede or prevent the progression of this scheme.



National Policy Objectives

Table 1 in section 2.2 of the written statement sets out national policy objectives relevant to the plan. In this context it may be appropriate to include national policy objective NPO57 which is to:

Enhance water quality and resource management by:

- Ensuring flood risk management informs place-making by avoiding inappropriate development in areas at risk of flooding in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities;
- Ensuring that River Basin Management Plan objectives are fully considered throughout the physical planning process;
- Integrating sustainable water management solutions, such as Sustainable Urban Drainage (SUDS), nonporous surfacing and green roofs, to create safe places.

It might also be noted that a draft first revision of this National Planning Framework has been published for public consultation.

Policy Objectives

Section 1.3.4 of the SFRA sets out relevant policy objectives from the Local Area Plan. The objectives included in this section are not consistent with the objectives as set out in the written statement.

Construction, Replacement or Alteration of Bridges and Culverts over Watercourses

Table 6.3 of the Local Transport Plan, discussed in section 14.4.2 of the written statement under “Cycle Route Schemes Table” refers to “*The Mall (from Little Water Street via the Mall and connection Nallinalee Road via new bridge crossing) (C2)*” and “*Demesne Ln / Battery Court / Little Water Street new connection and bridge*”. Additionally, policy objectives ST 28 and ST 29 reference bridges crossing the Camlin River.

It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.

Errata

Section 1.3.3 of the SFRA, discussing the planning policy context, is titled “*Longford Town Development plan 2021-2027*”. Longford County Council might clarify if this refers to the Longford County Development Plan 2021-2027.

Table 2-1 of the SFRA references flood events recorded on floodmaps.ie. This web portal is no longer operational. Historic flood information can be found on www.floodinfo.ie.

Flood Risk Infrastructure

It is noted that minor works, funded by the OPW have been completed in Longford Town.

Longford County Council might consider including a register of key flood risk infrastructure in the Local Area Plan where it would not otherwise be readily identified or protected from interference or removal.

Preliminary Flood Risk Assessment (PFRA)



Section 2.3 of the SFRA regarding Flood Risk Indicators contains discussion on Preliminary Flood Risk Assessment (PFRA) mapping. This dataset has been included on Table 2-2: Modelled Flood Risk Indicator Mapping, and PFRA extent mapping has been included in Appendix A of the SFRA. In addition, PFRA pluvial extents have been used in the assessment of risk to specific sites in section 4.3 of the SFRA.

PFRA indicative flood maps have been superseded by the national indicative fluvial, coastal and groundwater flood mapping, and therefore PFRA mapping provided to Local Authorities in 2012 should no longer be used for any purpose. Planning Authorities may need to carry out their own Flood Risk Assessments to inform the definition of Flood Zones for areas less than 5km² that were not included in the National CFRAM and NIFM Programmes.

The OPW do not intend to update the PFRA indicative pluvial maps, as it is not appropriate to map flooding from this source through a national-scale assessment, and maps would be more robust if produced at the community / local scale. While this dataset has not been superseded like the fluvial, coastal and groundwater it should also no longer be used by local authorities.

It is stated in Table 2-2 that “Further information on the purpose and development of the OPW PFRA Maps are available on www.cfram.ie” This website is no longer operational.

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 also 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 OPW welcomes the consideration of climate change via county development plan objectives CPO 5.109, CPO 5.110 and CPO 5.118. This consideration however, primarily relates to the consideration of the impacts of climate change at the development management stage.

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.

Drainage Districts

Section 2.2 of the SFRA discusses Drainage, Defences, and Early Warning Systems. It is stated that “As provided for under Plan measure County Policy Objective (CPO) 5.101 it is Council policy to “consult with the OPW in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible, and to retain a strip on either side of such channels where required, to facilitate maintenance access thereto”. Such retention will, in combination with the direction of development within the existing footprints of settlements, safeguard flood plains from development throughout the County.” It should



be noted that the statutory maintenance of the drainage district channels within the plan area lies with the local authority, not the OPW.

Justification Tests

The OPW welcomes the provision of plan making justification tests in the draft plan.

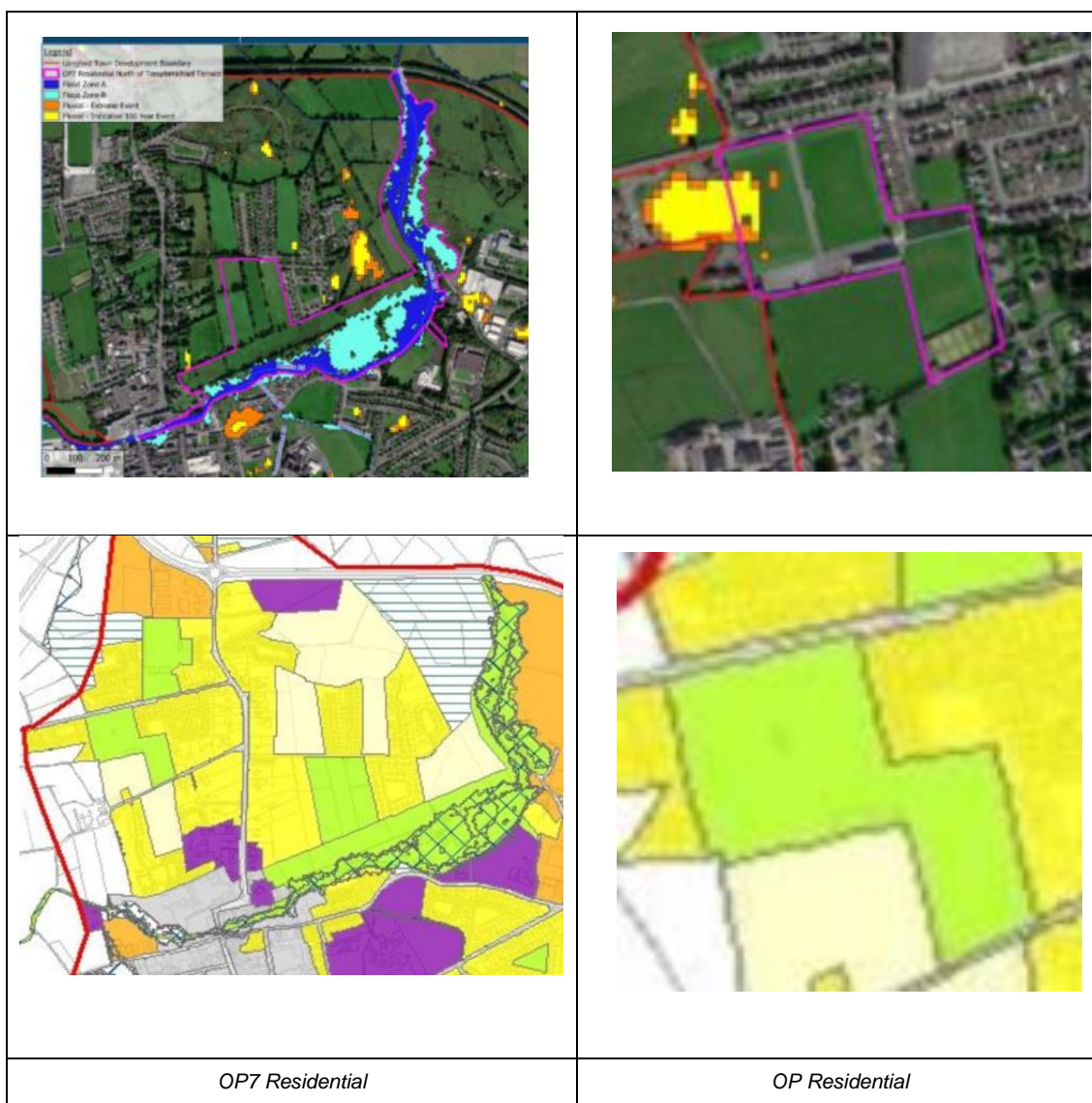
Please note that the Justification Test applies only to the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions), and would not be applicable to the periphery of urban areas. Only lands within or adjoining the core can be deemed to have satisfied the Justification Test.

It is noted that for each site where development in flood risk areas has been deemed justified, a dedicated flood risk assessment has been included. These flood risk assessments have concluded with a 'Development Options' summary. However, while these conclusions generally note the possibility of managing flood risk through site layout, finished floor levels, the only specific requirement set out is that they be subject to a detailed flood risk assessment at development management stage that assesses residual risk.

Part 3 of the Plan Making Justification Test as set out in the Guidelines is that *"A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere"*. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should **not** be passed on to development management.

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, or that 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 as above, following a detailed FRA.

Justification Tests have been included for residential lands OP7 and OP8, however these lands appear to have been zoned for water compatible open space.



If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie).

Yours sincerely,

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments