



**Forward Planning Section,
Offaly County Council,
Áras an Chontae,
Charleville Road,
Tullamore, County
Offaly**

01/10/2020

RE: Draft Offaly 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 Offaly County Development Plan 2021- 2027.

The OPW welcomes that flood zone mapping has been included in the settlement zone maps as zoning type "Constrained Land Use, and Objective LUZO – 14, that the management of flood risk in this zone type will be facilitated by Offaly County Council. The County Development Plan further outlines that developments within this zone will require a detailed flood risk assessment.

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

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. It should be noted that the flood maps prepared under the CFRAM Programme include maps for two potential future scenarios taking account of different degrees of climate impact.

The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, are available to view on the OPW portal, www.floodinfo.ie, and may be obtained in GIS format from the OPW Data Management Section via email (flood_data@opw.ie).

Examples of land use zonings in locations that are potentially at risk in future scenarios are detailed in the *Specific Settlements in the SFRA* 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 LAP. 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.

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.

Examples of where Benefitting Land Maps overlap with developments are *New Residential* site in Ballinagar, *New Residential and Community Services/ Facilities* site in Bracknagh and a *Strategic Residential Reserve* site in Clonbullogue.

Historic Floods

Flood event records for December 2015 to January 2016 floods in Banagher, Pollagh, Shannonbridge and Shannon Harbour are currently not available on the OPW flood portal; www.floodinfo.ie. These flood events have not been included in the Historical Indicators maps as part of the SFRA.

Specific Settlements in the SFRA

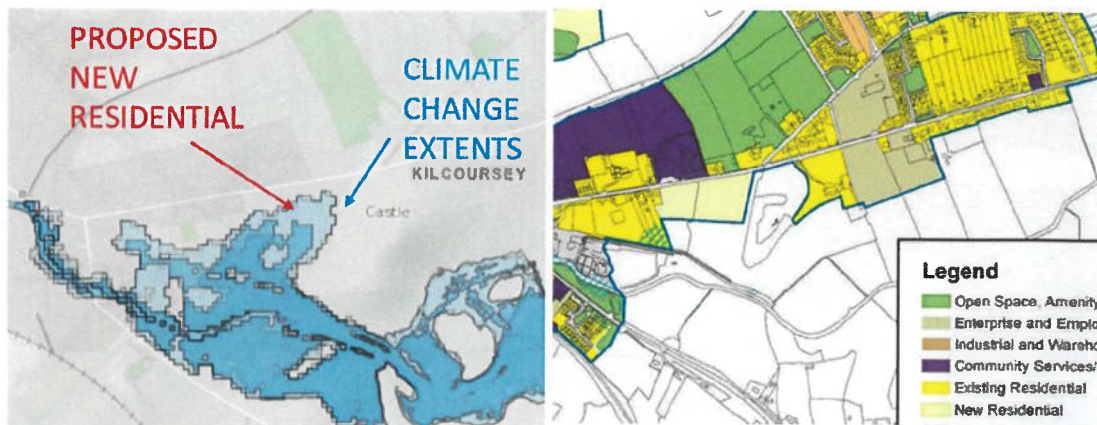
Birr

The OPW welcomes the inclusion of Objective CAEO-09 for the delivery of the flood relief scheme in Birr.

Clara

The proposed *New Residential* site overlaps with the potential future scenarios flood extent maps prepared under the National CFRAM Programme, which take account of climate change impacts.





Future Scenario (MRFS and HEFS) Flood Extents for Clara

Ferbane

There is a *Strategic Residential Reserve* site and an undeveloped *Town Centre / Mixed Use* site located within Flood Zone A.

Killeigh

An undeveloped *Employment Services / Facilities* site is located within Flood Zone A.

Moneygall

The PFRA maps appear to be the only information used to identify a small section of Flood Zone A, which overlaps with an undeveloped *Enterprise and Employment* site. The *Enterprise and Employment* site within Flood Zone A has not been designated as 'Constrained Land Use'.

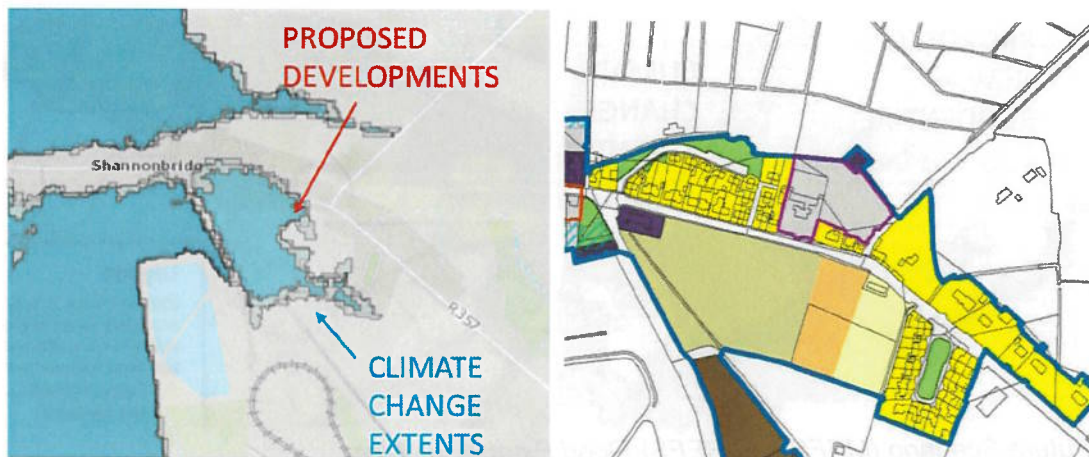
Rahan

The OPW welcomes the inclusion of Objective CAEO-09 for the delivery of the flood relief scheme in Rahan.

Shannonbridge

The proposed *New Residential*, *Strategic Residential Reserve*, and *Enterprise and Employment* sites overlap with the potential future scenarios flood extents maps prepared under the National CFRAM Programme, which take account of climate change impacts.





Future Scenario (MRFS and HEFS) Flood Extents for Shannonbridge

Tullamore

There is a *Strategic Residential Reserve* site and undeveloped *Town Centre / Mixed Use*, and *Enterprise and Employment* sites located within Flood Zone A.

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 Offaly County Development Plan 2021- 2027.

Yours sincerely,

pp Mark Adamson
Flood Relief and Risk Management Division

