



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

01/02/2023

**RE: Draft Edenderry Local Area Plan 2023 - 2029**

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Edenderry Local Area Plan 2023 - 2029.

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:

- To manage flood risk in accordance with the Guidelines and circular PL02/2014
- Objectives CAP-08 and TCP-13 to incorporate Sustainable Urban Drainage Systems and other nature-based solutions

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

**Flood Zone Mapping and the Sequential Approach**

The land use zoning maps have not been overlaid with the flood zone maps, therefore it is difficult to assess if the zonings/sites are at flood risk or if the sequential approach has been applied.

The sequential approach uses 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. To demonstrate that the sequential approach has been applied, flood zone maps should show the proposed land use zonings overlaid with both Flood Zone A and B.

**Preliminary Flood Risk Assessment (PFRA)**

PFRA indicative flood maps have been superseded by the recently published national indicative fluvial, coastal and groundwater flood mapping, and therefore the mapping provided in 2012 should no longer be used. Planning Authorities may need to carry out their own Flood Risk Assessments to inform the definition of Flood Zones for areas less than 5km<sup>2</sup> that were not included in the National CFRAM and NIFM Programmes.

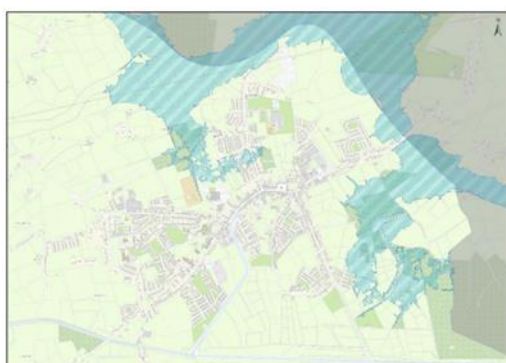


## Constrained Land Use

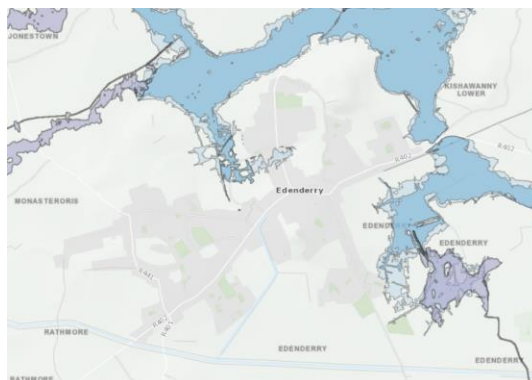
A *Constrained Land Use* zoning is described as applying to the Plan area, however the *Constrained Land Use* zoning type is not shown on the Zoning Map for Edenderry.

An objective has been included in relation to the constrained land use zoning, LUZO-13 “Facilitate the appropriate management and sustainable use of flood risk areas designated as ‘Constrained Land Use’ in the zoning map in accordance with the provisions of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009), as amended, in consultation with the OPW”. This objective should clarify that new development within the zoning is limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B, and that a detailed SSFRA will be required. The objective should ensure that the restrictions on the *Constrained Land Use* zoning is supported by, and are not used in-lieu of, a Plan-making Justification Tests.

While the NIFM flood extents are outside the Plan area, the *Constrained Land Use* shown in Figure 8.3 covers lands outside the Plan area and only shows the National CFRAM flood extents, please note there are also NIFM extents in this larger area. Offaly County Council should review the *Constrained Land Use* illustrated in the Draft Plan.



Draft Plan, Figure 8.3 Constrained Land Use



Floodinfo, CFRAM and NIFM 0.1% AEP and 1% AEP flood extents

## Justification Tests

There are a number of proposed land use zonings, some of which are classified as highly vulnerable development in the Guidelines, which have been described as being in Flood Zones A and B, for which no commentary has been included to indicate that the Plan Making Justification Test has been applied and passed.

Any lands that are undeveloped within the *Constrained Land Use* zoning, where inappropriate development is be proposed, should be rezoned as a water compatible type zoning in Flood Zone A, and less vulnerable or water compatible type zoning in Flood Zone B, or a Plan-making Justification Test should be carried out by the local authority.

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.

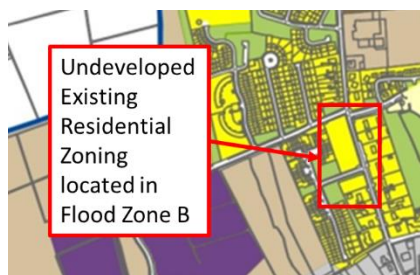
Circular PL 2/2014 provides advice and detail to planning authorities on existing, developed, zoned areas at risk of flooding. *“In some instances, particularly in older parts of cities and towns, an existing land use may be categorised as a “highly vulnerable development” such as housing, be zoned for residential purposes and also be located in flood zone A/B. Additional development such as small scale infill housing, extensions, or changes of use that could increase the risk or number of people in the flood-prone area can be expected in such a zone into the future. In these instances, where the residential / vulnerable use zoning has been considered as part of development plan preparation, including use of the Justification Test as appropriate, and it is considered that the existing use zoning is still appropriate, the development plan 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. Planning authorities should consider the issues and opportunities raised in section 4 of Appendix B (Technical Appendices) in this regard, and may consider including certain objectives or conditions as part of the zoning”.*

### **Existing Residential**

There are *Existing Residential* zonings located in Flood Zone B, for which no commentary has been included to indicate that the Plan Making Justification Test has been applied and passed. Highly vulnerable development is not considered appropriate in Flood Zone B unless a Plan-making Justification Test completed by the local authority can be satisfied. Please see comments in Justification Tests section above in relation to sites that are already developed.

There are also two areas zoned as *Existing Residential* which appear to be undeveloped and are located in Flood Zone B. Site 23 - Carrickhall/St. Conleth's Road Site is one of these sites, described in in Table 10.2 Site Appraisals as a small scale infill development. Highly vulnerable development is not considered appropriate in Flood Zone B unless a Plan-making Justification Test completed by the local authority can be satisfied.

Please note these zonings are susceptible to an increased flood risk in the mid-range future scenario and high-end future scenario, refer to Consideration of Climate Change Impacts section below.



Zoning Map, Undeveloped Existing Residential zonings located in Flood Zone B



Flood Zone Map, Undeveloped Existing Residential zonings located in Flood Zone B



## Community Services/Facilities

There are two areas zoned as *Community Services/Facilities* which appear to be undeveloped and are located in Flood Zone A and B. Site No. 20 - Incomplete Hotel Site, is one of these areas and in Table 10.2 Site Appraisals it is stated that *“Whilst it is noted that part of this site is located on land designated as ‘Constrained Land Use, it is considered that this site is suitable for community services/facilities as these uses not considered vulnerable flood uses”*. This site is highlighted as a proposed education facility on the Local Transport Plan Proposed Infrastructure Map. *Community Services/Facilities* type developments and schools are considered highly vulnerable development in the Guidelines. Highly vulnerable development is not considered appropriate in Flood Zone A and B, and less vulnerable development in Flood Zone A, unless a Plan-making Justification Test completed by the local authority can be satisfied.

For the other *Community Service/Facilities* site where only a small proportion of the site is at risk of flooding along the periphery of the site, please see comments above regarding Justification Tests.

Please note these zonings are susceptible to an increased flood risk in the mid-range future scenario and high-end future scenario, refer to Consideration of Climate Change Impacts section below.



Zoning Map, Undeveloped Community Services/Facilities zonings located in Flood Zone A and B



Flood Zone Map, Undeveloped Community Services/Facilities zonings located in Flood Zone A and B

## Enterprise and Employment

There are areas zoned as *Enterprise and Employment* which appear to be undeveloped and are located in Flood Zone A. These areas are identified as Site No. 18 - North of St. Francis Street and south west of Edenderry, and Site No. 19 - Monasteroris, north west of Edenderry Shopping Centre. In Table 10.2 Site Appraisals it is stated for both sites that *“Whilst it is noted that part of this site is located on land ‘Constrained Land Use, it is considered that this site is suitable for enterprise and employment as these uses are not considered vulnerable flood uses for the most part”*. The land use zoning type *Enterprise and Employment* is considered less vulnerable in the Guidelines, less vulnerable development is not considered appropriate in Flood Zone A unless a Plan-making Justification Test completed by the local authority can be satisfied. While Monasteroris are not included in Table 3.1 in the Guidelines, the list is non-exhaustive and it could be considered similar to a school which is a highly vulnerable type development. Highly vulnerable development is not considered appropriate in Flood Zone A and B unless a Plan-making Justification Test completed by the local authority can be satisfied.

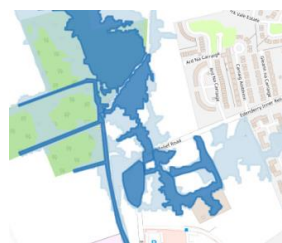


It is stated under Table 11.1 Land Use Zoning Matrix *“Note that new Permitted in Principle /Open for Consideration uses under ‘Enterprise and Employment’ Zoning in Flood Zone A or B shall be limited to less-vulnerable and/or water compatible uses (as per the Flood Risk Management Guidelines) This requirement will take primacy over any related provision relating to the land use zoning matrix”*. It should be clarified that Flood Zone A is limited to water-compatible uses and Flood Zone B is limited to less vulnerable or water compatible uses. These restrictions could be included as an objective, with the Site Appraisals, in the Section on Flood Risk Management and in the SFRA. Since only water compatible will be permitted in Flood Zone A these areas should be rezoned as a water compatible type such as *Open Space*.

Please note these zonings are susceptible to an increased flood risk in the mid-range future scenario and high-end future scenario, refer to Consideration of Climate Change Impacts section below.



Zoning Map, Undeveloped Enterprise and Employment zonings located in Flood Zone A



Flood Zone Map, Undeveloped Enterprise and Employment zonings located in Flood Zone A

### **Proposed Inner Relief Road**

There are references to the construction of a new Inner Relief Road which will pass through flood risk areas. The Guidelines classify essential infrastructure such as primary transport as highly vulnerable, and the zoning would not be appropriate in Flood Zones A and B unless a Plan Making Justification Test, completed by the local authority can be satisfied. Local transport infrastructure is classified as less vulnerable and the zoning would not be appropriate in Flood Zones A unless a Plan Making Justification Test, completed by the local authority can be satisfied.

### **Consideration of Climate Change Impacts**

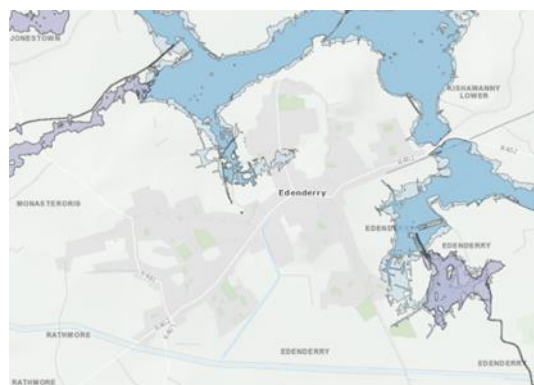
It is stated in Section 8.4.2 Flood Risk Management under Section 8.4 Nature-based Solutions that *“OPW Guidance on climate change, avoids zoning land for development at inappropriate locations through designating these flood prone lands (see Figure 8.3 below) as ‘Constrained Land Use’*”. However, the extents of the *Constrained Land Use* map appear to correspond with present day extents and not with future scenario extents. 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 and providing space for future flood defences. If Offaly County Council do include the future scenario extents in the *Constrained Land Use* this would demonstrate that Offaly County Council have considered climate change impacts in the preparation of this Plan, by avoiding development in areas potentially prone to flooding in the future.



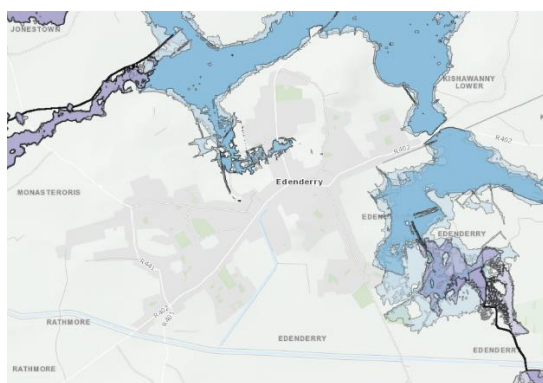


Figure 8.3 Edenderry Flood Map – Defines 'Constrained Land Uses'

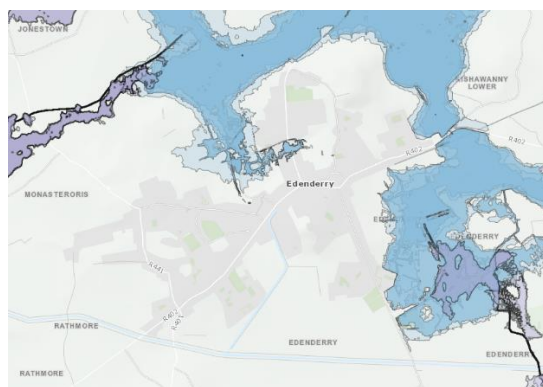
Draft Plan, Constrained Land Use Map



Floodinfo, CFRAM and NIFM Present Day Extents



Floodinfo, CFRAM and NIFM Mid-Range Future Scenario Extents



Floodinfo, CFRAM and NIFM High-End Future Scenario Extents

Reference is made in the SFRA to '2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management'. The OPW recommend that the SFRA refer to the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019 and the guidance on potential future scenarios contained therein.

### Arterial Drainage Schemes and Drainage Districts

The Arterial Drainage Scheme maintained by the OPW covers a considerable area around Edenderry town. In Section 8.4.2 Flood Risk Management it is stated that *"New developments will be required to ensure that access is preserved for the maintenance of the Drainage District and the OPW will be consulted with in the consideration of applications for developments in the vicinity of the Drainage District in this regard"*.

The Drainage District which is maintained by Offaly County Council is north of Edenderry and outside the Plan area. The text should be updated to include that access is preserved for both Arterial Drainage Schemes and Drainage Districts, however the OPW should only be consulted in relation to the OPW Arterial Drainage Schemes, as the Drainage District is the responsibility of Offaly County Council. As the area covered by Arterial Drainage Schemes is considerable, Offaly County Council should consider including the requirement for access for maintenance as a policy objective in the Plan. The location of Arterial Drainage Schemes and Drainage Districts may be viewed on [www.floodinfo.ie](http://www.floodinfo.ie).



OPW Arterial Drainage Schemes

## Nature-based Solutions and SuDS

The OPW welcomes objective CAP-08 to “*Incorporate Sustainable Urban Drainage Systems and other nature-based surface water drainage solutions as part of all proposed developments*” and objective TCP-13 to “*Incorporate Sustainable Urban Drainage Systems (SuDS) and other nature-based solutions in accordance with the ‘Nature-based Solutions to the Management of Rainwater and Surface Water Runoff in Urban Areas – Best Practice Interim Guidance Document, 2022’ and any subsequent editions*”.

The OPW also welcomes the SuDS techniques outlined as applicable for sites that are in high groundwater levels, steeply sloping, very flat and areas in floodplains in Section 3.5 Sustainable Drainage Systems and Surface Water Guidance and Strategy. Further guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites such as the Blundell Masterplan may be considered, where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

## Errata

In Table 5 County Development Plan Provisions relating to Flood Risk Management in the SFRA, it is unclear which point relates to which provision reference. It would be clearer if the information in the table could be presented similar way to Table 6 Draft Local Area Plan Provisions relating to Flood Risk Management. Also the last provision listed in the table, DMO-106 Flood Risk Assessments appears to be incomplete.

If further information or input is required, please do not hesitate to contact the OPW ([floodplanning@opw.ie](mailto:floodplanning@opw.ie)) in advance of the completion of the Edenderry Local Area Plan 2023-2029.

Yours sincerely,

Rachel Woodward

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments