STRATEGIC FLOOD RISK ASSESSMENT

FOR THE

BIRR LOCAL AREA PLAN 2023-2029

for: Offaly County Council

Áras an Chontae Charleville Road Tullamore County Offaly



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Section 1 Introduction and Policy Background

1.1 Introduction

Offaly Council has adopted a new Local Area Plan (LAP) for Birr under the Planning and Development Act 2000 (as amended). The Plan sets out an overall strategy for the proper planning and sustainable development over the years 2023-2029.

This Strategic Flood Risk Assessment (SFRA) document has been prepared alongside the LAP taking into account *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Department of the Environment, Community and Local Government Circular PL 2/2014.

1.2 The Local Area Plan and the existing, already in force, Offaly County Development Plan 2021-2027

LAPs are required to be consistent with the policies and objectives of the County Development Plan and its Core Strategy, as well as the National Planning Framework and Regional Spatial Economic Strategies.

The LAP should be read in conjunction with the Offaly County Development Plan 2021-2027, which sets out the overarching development strategy for the County. Where conflicting objectives arise between the County Development Plan and the LAP, the objectives of the relevant County Development Plan shall take precedence.

The general development management standards, zoning matrix/descriptions and policies and objectives in the County Development Plan applicable to settlements (including provisions relating to environmental protection and management) can be applied to the LAP boundary area, while additional policies and objectives that are specific to Birr are included in the LAP.

Land use zonings are already in force through the Offaly County Development Plan 2021-2027and are reproduced in the LAP. In addition, the land use zoning map in the LAP, corrects a number of relatively minor anomalies¹.

The detailed Offaly County Development Plan 2021-2027 preparation process undertaken by the Planning Department combined with specialist input from the SFRA process for the Offaly County Development Plan 2021-2027 facilitated zoning that avoids inappropriate development being permitted in areas of high flood risk. Flood and drainage related provisions have been integrated into both the LAP and the existing Offaly County Development Plan 2021-2027.

1.3 Flood Risk and its Relevance as an Issue to the Plan

1.3.1 Flood Risk

Flooding is an environmental phenomenon and can pose a risk to human health as well as causing economic and social effects. Some of the effects of flooding are identified on Table 1 below.

¹ For example:

Changing zoning to Open Space and Amenities to facilitate Potential Biodiversity Zones and potential development of wetlands;
 Changing zoning of lands from New Residential to Existing Residential, to be consistent with the County Development Plan as to how

Changing zoning of lands from New Residential to Existing Residential, to be consistent with the county bevelopment main as to invace the state and the county bevelopment main as to invace the state and the county bevelopment main as to invace the state and the county bevelopment main as to invace the state and the county bevelopment main as to invace the state and the county bevelopment main as to invace the state and the county bevelopment main as to invace the state and the county bevelopment main as to invace the state and the state and the county bevelopment main as to invace the state and the

Changing zoning reflect Existing Residential uses present at lands; and
 Changing zoning from New Decidential to white land/net zoned, to reflect

[•] Changing zoning from New Residential to white land/not zoned, to reflect how roads, footpaths and turning circles are treated elsewhere in the Local Area Plan and County Development Plan.

Certain lands within the Plan area have the potential to be vulnerable to flooding and this vulnerability could be exacerbated by changes in both the occurrence of severe rainfall events and associated flooding. Local conditions such as low-lying lands and slow surface water drainage can increase the risk of flooding.

Table 1 Potential effects that ma	y occur as a result of flooding
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Tangible Effects	Intangible Human and Other Effects
Damage to buildings (houses)	Loss of life
Damage to contents of buildings	Physical injury
Damage to new infrastructure e.g. roads	Increased stress
Loss of income	Physical and psychological trauma
Disruption of flow of employees to work causing knock on effects	Increase in flood related suicide
Enhanced rate of property deterioration and decay	Increase in ill health
Long term rot and damp	Homelessness
	Loss of uninsured possessions

1.4 Flood Risk Management Policy

1.4.1 EU Floods Directive

The European Directive 2007/60/EC on the assessment and management of flood risk aims to reduce and manage the risks that floods pose to human health, the environment, cultural heritage and economic activity. The Directive applies to inland waters as well as all coastal waters across the whole territory of the EU. The Directive requires Member States to:

- Carry out a preliminary assessment by 2011 in order to identify the river basins and associated coastal areas where potential significant flood risk exists (preliminary mapping was prepared and a list of Areas for Further Assessment finalised in 2012).
- Prepare flood extent maps for the identified areas (finalised in 2016 for inclusion in Flood Risk Management Plans see below).
- Prepare flood risk management plans focused on prevention, protection and preparedness. These plans are to include measures to reduce the probability of flooding and its potential consequences. These Plans were adopted in 2018.

Implementation of the EU Floods Directive is required to be coordinated with the requirements of the EU Water Framework Directive and the current National River Basin Management Plan.

1.4.2 National Flood Policy

Historically, flood risk management focused on land drainage for the benefit of agricultural improvement. With increasing urbanisation, the Arterial Drainage Act, 1945, was amended in 1995 to permit the Office of Public Works (OPW) to implement localised flood relief schemes to provide flood protection for cities, towns and villages.

In line with changing national and international paradigms on how to manage flood risk most effectively and efficiently, a review of national flood policy was undertaken in 2003-2004. The review was undertaken by an Inter-Departmental Review Group, led by the Minister of State at the Department of Finance with special responsibility for the OPW. The Review Group prepared a report that was put to Government, and subsequently approved and published in September 2004 (Report of the Flood Policy Review Group, OPW, 2004).

The scope of the review included a review of the roles and responsibilities of the different bodies with responsibilities for managing flood risk, and to set a new policy for flood risk management in Ireland into the future. The adopted policy was accompanied by many specific recommendations, including:

- Focus on managing flood risk, rather than relying only flood protection measures aimed at reducing flooding;
- Taking a catchment-based approach to assess and manage risks within the whole-catchment context; and
- Being proactive in assessing and managing flood risks, including the preparation of flood maps and flood risk management plans.

1.4.3 National CFRAM Programme

The national Catchment Flood Risk Assessment and Management (CFRAM) programme commenced in Ireland in 2011. The CFRAM Programme is intended to deliver on core components of the National Flood Policy, adopted in 2004, and on the requirements of the EU Floods Directive. The Programme has been implemented through CFRAM studies that have been undertaken for each of the river basin districts in Ireland.

The CFRAM Programme comprises three phases as follows:

- The Preliminary Flood Risk Assessment² (PFRA) mapping exercise, which was completed in 2012;
- The CFRAM Studies and parallel activities, with Flood Risk Management Plans finalised in 2018; and
- Implementation and Review.

The Programme provides for three main consultative stages as follows:

- Consultation for the PFRA mapping that was adopted in 2012;
- Consultation for Flood Extent mapping, that was finalised in 2016 for inclusion in Flood Risk Management Plans; and
- Consultation for Flood Risk Management Plans, that were adopted in 2018.

The OPW is the lead agency for flood risk management in Ireland. The coordination and implementation of Government policy on the management of flood risk in Ireland is part of its responsibility. The European Communities (Assessment and Management of Flood Risks) Regulations 2010 (S.I. No. 122) identifies the Commissioners of Public Works as the 'competent authority' with overall responsibility for implementation of the Floods Directive 2007/60/EC. The OPW is the principal agency involved in the preparation of CFRAM Studies.

1.4.4 Flood Risk Management Guidelines

1.4.4.1 Introduction

In 2009, the OPW and the then Department of the Environment and Local Government (DEHLG) published Guidelines on flood risk management for planning authorities entitled *The Planning System and Flood Risk Management - Guidelines for Planning Authorities.* The Guidelines introduce mechanisms for the incorporation of flood risk identification, assessment and management into the planning process. Implementation of the Guidelines is intended to be achieved through actions at the national, regional, local authority and site-specific levels. Planning authorities and An Bord Pleanála are required to have regard to the Guidelines in carrying out their functions under the Planning Acts.

² The PFRAs identified areas at risk of significant flooding and includes maps showing areas deemed to be at risk. The areas deemed to be most significant risk, where the flood risk that is of particular concern nationally, are identified as Areas for Further Assessment (AFAs). Birr was identified as an AFA. The OPW has undertaken a detailed assessment on the extent and degree of fluvial flood risk for various areas in County Offaly, including these AFAs, producing Flood Extent Mapping.

The core objectives of the Guidelines are to:

- Avoid inappropriate development in areas at risk of flooding;
- Avoid new developments increasing flood risk elsewhere, including that which may arise from surface water run-off;
- Ensure effective management of residual risks for development permitted in floodplains;
- Avoid unnecessary restriction of national, regional or local economic and social growth;
- Improve the understanding of flood risk among relevant stakeholders; and
- Ensure that the requirements of EU and national law in relation to the natural environment and nature conservation are complied with at all stages of flood risk management.

1.4.4.2 Principles of Flood Risk Management

The key principles of flood risk management set out in the flood Guidelines are to:

- Avoid development that will be at risk of flooding or that will increase the flooding risk elsewhere, where possible;
- Substitute less vulnerable uses, where avoidance is not possible; and
- Mitigate and manage the risk, where avoidance and substitution are not possible.

The Guidelines follow the principle that development should not be permitted in flood risk areas, particularly floodplains, except where there are no alternative and appropriate sites available in lower risk areas that are consistent with the objectives of proper planning and sustainable development.

Development in areas that have the highest flood risk should be avoided and/or only considered in exceptional circumstances (through a prescribed *Justification Test*) if adequate land or sites are not available in areas that have lower flood risk. Most types of development would be considered inappropriate in areas that have the highest flood risk. Only water-compatible development such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation and essential transport infrastructure that cannot be located elsewhere would be considered appropriate in these areas.

1.4.4.3 Stages of SFRA

The Flood Risk Management Guidelines recommend a staged approach to flood risk assessment that covers both the likelihood of flooding and the potential consequences. The stages of appraisal and assessment are:

Stage 1 Flood risk identification – to identify whether there may be any flooding or surface water management issues related to either the area of Regional Spatial and Economic Strategies, Development Plans and LAP's or a proposed development site that may warrant further investigation at the appropriate lower level plan or planning application levels.

Stage 2 Initial flood risk assessment – to confirm sources of flooding that may affect a Plan area or proposed development site, to appraise the adequacy of existing information and to scope the extent of the risk of flooding which may involve preparing flood zone maps. Where hydraulic models exist the potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment are scoped.

Stage 3 Detailed flood risk assessment – to assess flood risk issues in sufficient detail and to provide a quantitative appraisal of potential flood risk to a proposed or existing development or land to be zoned, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

1.4.4.4 Flood Zones

Flood risk is an expression of the combination of the flood probability or likelihood and the magnitude of the potential consequences of the flood event. It is normally expressed in terms of the following relationship:

Flood risk = Likelihood of flooding x Consequences of flooding

Likelihood of flooding is normally defined as the percentage probability of a flood of a given magnitude or severity occurring or being exceeded in any given year. For example, a 1% Annual Exceedance Probability (AEP) indicates the severity of a flood that is expected to be exceeded on average once in 100 years, i.e. it has a 1 in 100 (1%) chance of occurring in any one year.

Consequences of flooding depend on the hazards associated with the flooding (e.g. depth of water, speed of flow, rate of onset, duration, wave-action effects, water quality) and the vulnerability of people, property and the environment potentially affected by a flood (e.g. the age profile of the population, the type of development and the presence and reliability of mitigation measures).

Flood zones are geographical areas within which the likelihood of flooding is in a particular range and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning.

There are three types of flood zones defined for the purposes of the Flood Guidelines:

- Flood Zone A where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding³);
- Flood Zone B where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding); and
- Flood Zone C where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all other areas that are not in zones A or B.

A summary of the requirements of the Flood Guidelines for land uses across each of the above flood zones is provided at Appendix I.

1.5 Emerging Information and Disclaimer

It is important to note that compliance with the requirements of the Flood Risk Management Guidelines is currently based on emerging and best available data at the time of preparing the assessment, including Flood Risk Management Plans, which will be updated on a cyclical basis as part of CFRAM activities. This document is an updated version of the SFRA report that was originally placed on public display alongside the Draft Plan – updates have taken into account both submissions made on the original SFRA report and Material Alterations that were made to the original Draft Plan on foot of submissions.

Following adoption of the Plan, information in relation to flood risk may be altered in light of future data and analysis, by, for example, the OPW, or future flood events. As a result, all landowners and developers are advised that Offaly County Council and their agents can accept no responsibility for losses or damages arising due to assessments of the vulnerability to flooding of lands, uses and developments. Owners, users and developers are advised to take all reasonable measures to assess the vulnerability to flooding of lands and buildings (including basements) in which they have an interest prior to making planning or development decisions.

Any future SFRAs for the Plan area or for the County will integrate other new and emerging data.

³ Coastal flooding is not relevant to County Offaly

Section 2 Stage 1 SFRA - Flood Risk Identification

2.1 Introduction

Stage 1 SFRA (flood risk identification) has already been undertaken as part of the Offaly County Development Plan 2021-2027 preparation process in order to identify whether there may be any flooding or surface water management issues within or adjacent to zoned lands and consequently whether Stage 2 SFRA (flood risk assessment) should be proceeded to. It is reproduced in part this document.

Birr is located within the Shannon River Basin District (RBD). Appendix II shows the spatial distribution of surface waters across County Offaly and the RBD boundaries. Stage 1 SFRA is based on existing information on flood risk indicators based on historical evidence and computational models. A selection of key indicators is mapped for County Offaly and Birr in Appendix II.

2.2 Drainage, Defences and Early Warning Systems

With regard to areas benefitting from drainage and defences (flood relief scheme works), there are various measures that have been implemented in County Offaly that will contribute towards flood risk management. These include the culverting of various streams and rivers in many urban areas and embankments, both occurring in Birr (see also Appendix II mapping). There is an emerging proposed Flood Relief Scheme for Birr (estimated cost in 2020 of €2.09m, protecting 29 (no.) properties when completed) that the Local Area Plan supports (Local Area Plan Objective CAO-05).

Arterial Drainage Schemes were carried out by the Office of Public Works under the Arterial Drainage Act 1945 to improve land for agricultural purposes and to mitigate flooding. Arterial drainage maintenance and monitoring of these schemes is still carried out by OPW on rivers, lakes, weirs, bridges and embankments to maintain adequate conveyance and ensure that flood waters (of varying magnitude but typically the 3-year flood) are retained in bank by lowering water levels during the growing season thus reducing waterlogging on the adjacent land during wetter periods.

The 2018 Flood Risk Management Plan (FRMP) for the Shannon Upper and Lower catchment identifies various general measures applicable to County Offaly as part of the wider Shannon Upper and Lower catchment under "Measures Applicable for all Areas"⁴.

The provision of flood protection measures can significantly reduce flood risk. However, the Ministerial Guidelines require that the presence of flood protection structures should be ignored in determining flood zones. This is because of risks relating to failure and severe flood events that exceed design capacity (the risk of severe events is exacerbated with climate change). Notwithstanding this, new development can proceed in areas that are at elevated levels of flood risk subject to the Justification Test provided for by the Guidelines being passed, which takes into account proposals to manage flood risk, such as the development of defences. Although insurance can be challenging to attain in these instances.

⁴ Under the headings of:

Prevention: Sustainable Planning and Development Management

Prevention: Sustainable Urban Drainage Systems

Prevention: Voluntary Home Relocation

Prevention: Local Adaptation Planning

Prevention: Land Use Management and Natural Flood Risk Management Measures

Protection: Minor Works Scheme Maintenance of Arterial Drainage Schemes and Existing Flood Relief Schemes

Protection: Maintenance of Drainage Districts Maintenance of Channels Not Part of a Scheme Preparedness: Flood Forecasting

[•] Preparedness: Review of Emergency Response Plans for Severe Weather Preparedness: Individual and Community Resilience

Preparedness: Individual Property Protection

Preparedness: Flood-Related Data Collection

Management of water levels on the River Shannon

Operation and Maintenance of ESB and Waterways Ireland Infrastructure

As provided for under Offaly County Development Plan 2021-2027 measure CAEP-55, it is "Council policy to consult with the Office of Public Works (OPW) in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible, and the Council will retain a strip of 10 metres on either side of such channel where required, to facilitate 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.

Met Éireann currently issues flood warnings for County Offaly. Met Éireann, in collaboration with the OPW, is currently engaged in the establishment of a National Flood Forecasting and Warnings Service to forecast for fluvial and coastal flood events.

2.3 Other Flood Studies

Other Flood Studies considered include:

- SFRA for the Offaly County Development Plan 2021-2027;
- Flood Risk Management Plan (Shannon Upper and Lower), 2018; and
- Regional Flood Risk Assessment for the Eastern and Midland Regional Spatial and Economic Strategy, 2019.

2.4 Flood Risk Indicators

Indicators of flood risk that are based on historical flooding events are identified and described on Table 2. Indicators of flood risk that are based on computational models – predictive flood risk indicators – are identified and described on Table 3. Both historical and predictive flood risk indicators are mapped at county and settlement level in Birr in Appendix II.

Information Source	Description	Strategic Limitations
Recorded Flood Events from the OPW	A flood event is the occurrence of recorded flooding at a given location on a given date. The flood event is derived from different types of information (reports, photographs etc.).	This dataset only provides a spot location
Recurring Flood Events	A flood event that has occurred more than once at a certain area is named a recurring flood event.	This dataset only provides a spot location
OPW Flood Extent	A flood extent is an inundated area as recorded at a certain moment in time. This layer of information includes floods recorded in 1999/2000 and 1954.	Coverage limited
Alluvium Soils	Mineral alluvial soil mapping is indicative of recurrent or significant fluvial flooding at some point in the past and was generated by Teagasc with co-operation of the Forest Service, EPA and GSI. This project was completed May 2006.	Drainage may have changed significantly since these soils were deposited.
Benefitting lands (OPW)	Benefitting lands mapping is a dataset identifying land that might benefit from the implementation of Arterial (Major) Drainage Schemes (under the Arterial Drainage Act 1945) and indicating areas of land estimated or reported to be subject to flooding or poor drainage.	Identifies broad areas - low resolution for flood risk management
Drainage Districts (OPW)	This drainage scheme mapping dataset was prepared on behalf of the Drainage Districts (Local Authorities with statutory responsibility for maintenance under the Arterial Drainage Act, 1925). These maps identify land that might benefit from the implementation of Arterial (Major) Drainage Schemes and indicate areas of land subject to flooding or poor drainage. There is a Drainage District to the south of Birr Town, which is mapped in Appendix II	Identifies large broad areas - very low resolution for flood risk management
Land Commission (OPW)	This dataset indicates areas of land defended to some degree against flooding that were formerly the responsibility of the Land Commission.	Identifies broad areas - low resolution for flood risk management
Geological Survey of Ireland (GSI) Flood Event	Probabilistic and historic groundwater flood maps available on the GSI's Groundwater Flooding Data Viewer have been prepared by Geological Survey Ireland through the 2016-2019 GWFlood Project. The Groundwater Flood Probability Maps show the probabilistic	This 2015-2016 data shows surface water flooding and does not distinguish between fluvial

Table 2 Historical Flood Risk Indicators

Information Source	Description	Strategic Limitations
	flood extent of groundwater flooding in limestone regions and are focused primarily (but not entirely) on flooding at seasonally flooded wetlands known as turloughs. The Historic Groundwater Flood Map shows the observed peak flood extents caused by groundwater in Ireland and are largely based on the winter 2015 / 2016 flood event, which was the largest flood on record in many areas.	and pluvial flooding.

Table 3 Predictive Flood Risk Indicators

Information Source	Description	Strategic Limitations
CFRAM Study, Flood Extent Mapping, 2016 Following the undertaking of the PFRA, the OPW, through its engineering consultants and working with local authorities and other stakeholders, conducted extensive engineering assessments to better understand and detail the actual risk from flooding for areas that were at highest levels of risk. This was the subject of public consultation. The outcome of that work includes Predicted Flood Extent maps that were finalised in 2016. For fluvial flood levels, calibration and verification of the models make use of the best available data including hydrometric records, photographs, videos, press articles and anecdotal information.		Spatial spread is limited, including to the areas that are considered to be at most risk of flooding.
OPW Preliminary Flood Risk Assessment (PFRA) Fluvial, Groundwater and Pluvial flood maps, 2012 ⁵	 The OPW PFRA mapping dataset has been arrived at by: Reviewing records of floods that have happened in the past; Undertaking analysis to determine which areas might flood in the future, and what the impacts might be; and Extensive consultation with each local authorities and other Government departments and agencies. This assessment has considered all types of flooding, including that which can occur from rivers, the sea and estuaries, heavy rain, groundwater, the failure of infrastructure, and so on. It has also considered the impacts flooding can have on people, property, businesses, the environment and cultural assets. Further information on the purpose and development of the OPW PFRA Maps are available on www.floodinfo.ie.	The PFRA is only a preliminary assessment, based on available or readily derivable information. Analysis has been undertaken to identify areas prone to flooding, and the risks associated with such flooding, but this analysis is purely indicative and undertaken for the purpose of completing the PFRA. The mapping has been developed using simple and cost-effective methods and is based on
	The PFRA indicative flood maps have now been superseded by the recently published national indicative fluvial flood mapping. There is no national indicative fluvial flood mapping available within or surrounding the Plan area.	broad-scale simple analysis and may not be accurate for a specific location/use.

2.5 Conclusion

The information detailed above (and considered by the SFRA already undertaken as part of the Offaly County Development Plan 2021-2027 preparation process) indicates elevated levels of flood risk in various locations across the town; therefore, a Stage 2 SFRA was proceeded to.

⁵ **Appendix II** of this assessment includes PFRA Fluvial mapping. Pluvial and groundwater flood risk is present in the County, as indicated by the PFRA mapping, however; it is not taken into account in the delineation of flood zones. Nonetheless, it has informed the development of recommendations detailed in **Error! Reference source not found**.

Pluvial risk is indicated by the PFRA in areas across the County. Pluvial flood risk is likely to be present in local areas, however; it is not taken into account in the delineation of flood zones. Furthermore, PFRA indicative pluvial maps (2012) are not considered to be reliable for the purposes of zoning or decision-making.

Groundwater risk is indicated by the PFRA as being significantly less common and is present in local areas in the north west of the County.

Section 3 Stage 2 SFRA - Flood Risk Assessment

3.1 Introduction

Stage 2 SFRA (flood risk assessment) has already been undertaken as part of the Offaly County Development Plan 2021-2027 preparation process in order to:

- Confirm the sources of flooding that may affect zoned and adjacent areas;
- Appraise the adequacy of existing information as identified by the Stage 1 SFRA; and
- Scope the extent of the risk of flooding through the preparation of flood zone maps.

3.2 Findings and Adequacy of Existing Information and Delineation of Flood Zones

Desk and in-field studies were undertaken taking into account the following factors:

- OPW's CFRAMS fluvial flood extent mapping (2016) and other predictive indicators
- Historical indicators of flood risk
- Documented Council knowledge of lands;
- Council Engineer review and input into indicators and flood zones (local knowledge);
- The potential source and direction of flood paths from rivers and streams;
- Vegetation indicative of flood risk; and
- The locations of topographic/built features that coincide with the flood indicator related boundaries/topographical survey.

Within the annual exceedance probabilities specified by the Flood Guidelines for Flood Zones A and B, there are elevated levels of flood risk at certain areas in Birr for which land use zoning is provided for by the existing, already in force Offaly County Development Plan 2021-2027 (refer also to Section 1.2 of this report), as shown in Appendix II.

A summary of in-field groundtruthing of flood risk indicators undertaken as part of the SFRA for the Offaly County Development Plan 2021-2027 preparation process at Birr is provided on Table 4.

Table 4 Summary of in-field groundtruthing

Settlement	Groundtruthing of Fluvial Flood Risk
Birr, including Crinkill	The Camcor River has a flood plain outside and upstream of the Plan area – as identified by the flood indicator mapping. The Camcor's flood plain is relatively confined within Birr with built development within the settlement generally avoiding areas at elevated levels of fluvial flood risk. Areas to the north of Crinkle are at risk from the Rock (Birr) River and the available flood risk indicators reflect the topography and flood paths observed and the flood plain is clearly defined.

3.3 Flood Risk Zone Mapping

Flood Risk Zone maps have been produced taking into account the findings of the Stage 1 and Stage 2 SFRA desk and in field studies as identified above⁶.

The Flood Risk Zone map for Birr is provided in Appendix II and identifies Flood Zone A (darker blue) and Flood Zone B⁷ (lighter blue). All other areas fall within Flood Zone C. As per the Guidelines, the flood zones in County Offaly are as follows:

⁶ Including taking into account predictive and historical indicators of flood risk, documented Council knowledge of lands, Council Engineer review and input into indicators and flood zones (local knowledge), the potential source and direction of flood paths from rivers and streams, vegetation indicative of flood risk and the locations of topographic/built features that coincide with the flood indicator related boundaries/topographical survey.

⁷ As identified by the Guidelines, in rivers with a well-defined floodplain or where the coastal plain is well defined at its rear, the limits of Zones A and B will virtually coincide. Zone B will only be significantly different in spatial extent from Zone A where there is extensive land with a gentle gradient away from the river or the sea.

- Flood Zone A where the probability of flooding from rivers is highest (greater than 1% or 1 in 100 for river flooding);
- Flood Zone B where the probability of flooding from rivers is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding); and
- Flood Zone C where the probability of flooding from rivers is low (less than 0.1% or 1 in 1000 for river flooding).

All flood zones are subject to FRA of flood hazards from other sources, which should assess all potential sources of flooding that may affect the site – from rivers, streams, surface water run-off, sewers, groundwater, reservoirs, canals and other artificial sources or any combination of these.

3.4 Sensitivity to Climate Change

'The Planning System and Flood Risk Management Guidelines for Planning Authorities and Technical Appendices, 2009' recommends that a precautionary approach to climate change is adopted due to the level of uncertainty involved in the potential effects. In this regard, the Guidelines recommends:

- Recognising that significant changes in the flood extent may result from an increase in rainfall
 or tide events and accordingly adopting a cautious approach to zoning land in these potential
 transitional areas;
- Ensuring that the levels of structures designed to protect against flooding such as flood defences⁸, land raising or raised floor levels are sufficient to cope with the effects of climate change over the lifetime of the development they are designed to protect (normally 85-100 years); and
- Ensuring that structures to protect against flooding and the development protected are capable of adaptation to the effects of climate change when there is more certainty about the effects and still time for such adaptation to be effective.

Flood Risk Assessments shall apply the precautionary approach recommended in the Guidelines and shall be informed by the advice on the expected impacts of climate change and the allowances to be provided for future flood risk management provided in the OPW's (2019) Flood Risk Management Climate Change Sectoral Adaptation Plan.

The CFRAM Programme include maps for two potential future scenarios taking account of different degrees of climate impact, the Mid-Range Future Scenario (more likely to occur over the coming decades) and the High-Range Future Scenario (less likely to occur over the coming decades). A selection of Future Scenario Mapping is provided under Appendix II of this SFRA report. In compliance with the Guidelines, the Flood Zones identified by the SFRA are defined on the basis of current flood risk. The CFRAMS potential future scenarios mapping and the potential impacts of climate change, including increased rainfall intensities and increased fluvial flood flows, are required to be further taken into account at lower tiers of decision making concerning individual projects.

3.5 Sustainable Drainage Systems and Surface Water Guidance and Strategy

As provided for by measures integrated into both the existing, already in force, Offaly County Development Plan and the Local Area Plan (including the measures reproduced at Section 4 of this report), new developments will be required to incorporate the requirement for Sustainable Urban Drainage Systems (SuDS) where appropriate. In combination, these provisions contribute towards a sustainable drainage strategy for the Plan area.

It is likely that some or all of the following SuDS techniques will be applicable to key development sites within Birr, including to manage surface water run-off:

- Rainwater harvesting
- Green roofs
- Infiltration systems

⁸ Defended areas are highly sensitive to climate change as the likelihood of defence failure and resulting flooding increases.

- Proprietary treatment systems
- Filter strips
- Filter drains
- Swales
- Bioretention systems
- Trees
- Pervious pavements
- Attenuation storage tanks
- Detention basins
- Ponds and wetlands

Land use zonings objectives at potential future development sites within Birr (including the two opportunity sites, Mart Site and Rectory Lands⁹) are already in force through the Offaly County Development Plan 2021-2027 and are reproduced in the LAP.

Because of the infinite range of land use types and associated developments and designs that could occur on sites within the Plan area under this type of Plan¹⁰, the guidance from this SFRA is to consider the full range of SUDs available, taking into account the recommendations and information provided above and below. On key development/opportunity sites integrated and area-based provision of SuDS and green infrastructure may be appropriate in order to avoid reliance on individual site by site solutions.

Each zoning objective allows for a range of possible uses and as the County Development Plan allows for a range of scales, heights, densities configurations/layouts and designs. The application of different SuDS techniques will be dependent on a combination of the site's characteristics and the development (when known) being considered.

Some sites, such as those for which guidance is provided for below, will pose particular challenges for SuDS. The best practice manuals cited at the end of this sub-section should be considered in determining solutions at these and other development sites.

At sites with high groundwater levels:

- Infiltration techniques may be particularly challenging and shallow infiltration basins or permeable pavements, may be most appropriate.
- Storage and conveyance systems need to be kept above maximum groundwater levels and membranes of appropriate robustness should be used to line any tanks
- Locating storage tanks or lined sub-base systems below the maximum likely groundwater level can cause result in flotation and structural risks

At sites that are steeply sloping:

- Effective utilisation of SuDS storage capacity should be considered, which can benefit from aligning with contours of roads and other structures, where these sites are terraced. Terraced car-parking areas can allow for storage of water through pervious pavements. Basins on terraces can provide open space. The runoff catchment on these sites can also be divided into smaller sub catchments.
- Velocities in swales and basins due to the steep slope can be managed by using check dams in swales or in storage layers, such as below permeable pavements.
- The possibility of infiltrating water resurfacing downslope or to increase pressure on downslope structures, such as walls, causing them to fail should be considered.

At sites that are very flat:

• On very flat sites, it is often not possible to construct piped drainage systems with sufficient falls to achieve minimum self-cleansing velocities. The solution can involve the use of shallow SuDS components such as swales, pervious pavements or high-capacity linear drainage channels, often dividing the site into small sub-catchments and providing local combined storage and conveyance components.

⁹ Further to the opportunity sites, key development has the potential to occur anywhere else within the Plan area.

¹⁰ Refer to Plan "Table 11.1 Land Use Zoning Matrix", for example, for the wide range of land uses possible at sites zoned with single land use zoning objectives.

- A slight fall on any subgrade exposed to water is preferred in order to avoid ponding of water and reduction in strength in the soil due to waterlogging. If this is not possible then reduction in strength should be taken into account in the structural design of tanks or pervious pavements.
- Pumping should be a last resort and only allowable in situations where guaranteed maintenance of the pumps can be ensured.

At sites that include areas of floodplain:

- Notwithstanding that all storage volume should normally be provided within the development footprint, outside of the floodplain, SuDs on floodplains can be effective in managing routine rainfall/treatment for frequent events.
- SuDs should be selected and designed taking account of the likely high groundwater table and vulnerability to erosion during periods of high flows/water levels and SuDS should not reduce floodplain storage or conveyance.
- Conveyance routes should limit grading and the creation of surface features that could either reduce floodplain capacity or be washed out in a flood.
- Surface discharge from SuDS should be dispersed with point discharges minimised or eliminated.
- All SuDS within or crossing a floodplain should take full consideration of the likely influence of river water levels on the design performance. Combined probability assessments may be required.
- Siltation and subsequent clearance after a flood event has subsided should also be taken into account in the design.

SuDS are effective technologies, which aim to reduce flood risk, improve water quality and enhance biodiversity and amenity.

The systems should aim to mimic the natural drainage of the application site to minimise the effect of a development on flooding and pollution of existing waterways. SuDS include devices such as swales, permeable pavements, filter drains, storage ponds, constructed wetlands, soakways and green roofs. The integration of nature-based solutions, such as amenity areas, ecological corridors and attenuation ponds, into public and private development initiatives, is applicable within the provisions of the Plan and should be encouraged.

In some exceptional cases, and at the discretion of the Council, where it is demonstrated that SuDS devices are not feasible, approval may be given to install underground attenuation tanks or enlarged pipes in conjunction with other devices to achieve the required water quality. Such alternative measures will only be considered as a last resort. Proposals for surface water attenuation systems should include maintenance proposals and procedures.

Urban developments, both within developments and within the public realm, should seek to minimise and limit the extent of hard surfacing and paving and require the use of sustainable drainage techniques for new development or for extensions to existing developments, in order to reduce the potential impact of existing and predicted flood risk. Development proposals should be accompanied by a comprehensive SuDS assessment that addresses run-off rate, run-off quality and its impact on the existing habitat and water quality.

For larger sites (i.e. multiple dwellings or commercial units) master planning should ensure that existing flow routes are maintained, through the use of green infrastructure. In addition, where multiple individual proposals are being made SUDS should be integrated where appropriate and relevant.

All proposed development, should consider the impact of surface water flood risks on drainage design e.g. in the form of a section within the flood risk assessment (for sites in Flood Zone A or B) or part of a surface water management plan.

Pluvial flood risk is likely to be present in local areas, however; it is not taken into account in the delineation of flood zones. Furthermore, PFRA indicative pluvial maps (2012) are not considered to be reliable for the purposes of zoning or decision-making - these maps should not be used to assess

pluvial flooding. Particular attention should be given to development in low-lying areas which may act as natural ponds for collection of run-off. The drainage design should ensure no increase in flood risk to the site, or the downstream catchment. Where possible, and particularly in areas of new development, floor levels should at an appropriate height above adjacent roads and hard standing areas to reduce the consequences of any localised flooding. Where this is not possible, an alternative design appropriate to the location may be prepared.

Further to the above, proposals for development should consider the Construction Industry Research and Information Association (CIRIA) SuDS Manual 2015 and any future update of this guidance and Greater Dublin Strategic Drainage Study documents in designing SUDS solutions, including the New Development Policy, the Final Strategy Report, the Code of Practice and "Irish SuDS: guidance on applying the GDSDS surface water drainage criteria".

Section 4 Flood and Drainage Provisions

4.1 Introduction

In order to comply with *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Department of the Environment, Community and Local Government Circular (*PL 2/2014*) and contribute towards flood risk management within the Plan area, the measures below have been integrated into the Birr Local Area Plan and the existing, already in force, Offaly County Development Plan 2021-2027.

4.2 Land Use Zoning from the existing, already in force, Offaly County Development Plan

That Flood Zones identified by the SFRA as part of the Offaly County Development Plan 2021-2027 were used in line with the requirements provided for by the Flood Guidelines for land uses in Flood Zones A and B.

With respect to lands which have already been developed, the potential conflict between zonings and *highly* and *less vulnerable* development (see Tables 7 and 8 in Appendix I) were avoided by applying the constrained land use approach, with blue hatched shaded zone, 'Constrained Land Use', applied on the land use zone mapping in order to differentiate that there is a flood risk issue.

To this effect, the following provisions have been integrated into the Offaly County Development Plan 2021-2027:

Chapter 12 Land Use Zoning

12.6.1 Constrained Land Uses

Flood risk areas in settlement plans are represented by a 'Constrained Land Use' designation. This designation generally limits new development, but will facilitate existing development uses within these areas that may require small scale development such as small extensions. Development proposals within these areas shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), which shall assess the risks of flooding associated with the proposed development.

Proposals shall only be considered favourably where it is demonstrated to the satisfaction of the Planning Authority that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities, or increase the risk of flooding to other locations and be in accordance with the proper planning and sustainable development of the area. The nature and design of structural and non-structural flood risk management measures required for development in such areas will also be required to be demonstrated, to ensure that flood hazard and risk will not be increased. Measures proposed shall follow best practice in the management of health and safety for users and residents of the development.

LUZO-14 Constrained Land Use

Facilitate the appropriate management and sustainable use of flood risk areas designated as 'Constrained Land Use' on Settlement Plan zoning maps.

Chapter 13 Development Management Standards

DMO-106 Flood Risk assessments

Flood Zones and Appropriate Uses

The table below indicates the types of land uses that are appropriate in each of the Flood Zones identified within the Plan area, in accordance with the 2009 Flood Risk Management Guidelines for Planning Authorities and Departmental Circular PL2/2014 (or any updated/superseding legislation or policy guidance).

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 in accordance with The Planning System and Flood Risk Management Guidelines 2009 (and as updated).

Flood	Overall	Planning implications for land uses		
Zones	probability	Highly Vulnerable Development	Less Vulnerable Development	Water Compatible Development
Flood Zone A	Highest	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Appropriate – screen for flood risk
Flood zone B	Moderate	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Inappropriate due to climate change – if proposed then Justification Test and detailed Flood Risk Assessment is required	Appropriate – screen for flood risk
Flood Zone C	Lowest	Appropriate - detailed Flood Risk Assessment may be required	Appropriate - detailed Flood Risk Assessment may be required	Appropriate – screen for flood risk

Note (refer to Flood Risk Management Guidelines 2009 and 'SFRA for the Offaly County Development Plan 2021-2027' for additional detail):

- Highly Vulnerable Development Houses, schools, hospitals, residential institutions, emergency services, essential infrastructure, etc.
- Less Vulnerable Development Economic uses (retail, leisure, warehousing, commercial, industrial, non-residential institutions, etc.), land and buildings used for agriculture or forestry, local transport infrastructure, etc.
- Water Compatible Development Docks, marinas, wharves, water-based recreation and tourism (excluding sleeping accommodation), amenity open space, sports and recreation, flood control infrastructure, etc.

Site-specific Flood Risk Assessments

The detail of these site-specific FRAs will depend on the level of risk and scale of development but it is advised that The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG and OPW, 2009) (or any superseding document) and available information from CFRAM Studies, including existing and emerging CFRAMS mapping (including National Indicative Fluvial mapping) and the most up to date CFRAM Programme climate scenario mapping shall be consulted with to this effect. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations..

Structural and Non-Structural Risk Management Measures in Flood Vulnerable Zones

Applications for development in flood vulnerable zones shall provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following:

Floor Levels

In areas of limited flood depth, the specification of the threshold and floor levels of new structures shall be raised above expected flood levels to reduce the risk of flood losses to a building, by raising floor heights within the building structure using a suspended floor arrangement or raised internal concrete platforms.

When designing an extension or modification to an existing building, an appropriate flood risk reduction measure shall be specified to ensure the threshold levels into the building are above the design flood level. However, care must also be taken to ensure access for all is provided in compliance with Part M of the Building Regulations.

Where threshold levels cannot be raised to the street for streetscape, conservation or other reasons, the design shall specify a mixing of uses vertically in buildings - with less vulnerable uses located at ground floor level, along with other measures for dealing with residual flood risk

Internal Layout

Internal layout of internal space shall be designed and specified to reduce the impact of flooding [for example, living accommodation, essential services, storage space for provisions and equipment shall be designed to be located above the predicted flood level]. In addition, designs and specifications shall ensure that, wherever reasonably practicable, the siting of living accommodation (particularly sleeping areas) shall be above flood level. With the exception of single storey extensions to existing properties, new single storey accommodation shall not be deemed appropriate where predicted

flood levels are above design floor levels. In all cases, specifications for safe access, refuge and evacuation shall be incorporated into the design of the development.

Flood-Resistant Construction

Developments in flood vulnerable zones shall specify the use of flood-resistant construction aimed at preventing water from entering buildings - to mitigate the damage floodwater caused to buildings.

Developments shall specify the use of flood resistant construction prepared using specialist technical input to the design and specification of the external building envelope - with measures to resist hydrostatic pressure (commonly referred to as "tanking") specified for the outside of the building fabric. The design of the flood resistant construction shall specify the need to protect the main entry points for floodwater into buildings - including doors and

windows (including gaps in sealant around frames), vents, air-bricks and gaps around conduits or pipes passing through external building fabric. The design of the flood resistant construction shall also specify the need to protect against flood water entry through sanitary appliances as a result of backflow through the drainage system

Flood-Resilient Construction

Developments in flood vulnerable zones that are at risk of occasional inundation shall incorporate design and specification for flood resilient construction which accepts that floodwater will enter buildings and provides for this in the design and specification of internal building services and finishes. These measures limit damage caused by floodwater and allow relatively quick recovery. This can be achieved by specifying wall and floor materials such as ceramic tiling that can be cleaned and dried relatively easily, provided that the substrate

materials (for example, blockwork) are also resilient. Electrics, appliances and kitchen fittings shall also be specified to be raised above floor level, and oneway valves shall be incorporated into drainage pipes.

Emergency Response Planning

In addition to considering physical design issues for developments in flood vulnerable zones, the developer shall specify that the planning of new development also takes account of the need for effective emergency response planning for flood events in areas of new development. Applications for developments in flood vulnerable zones shall provide details that the following measures will be put in place and maintained:

- Provision of flood warnings, evacuation plans and ensuring public awareness of flood risks to people where they live and work
- Coordination of responses and discussion with relevant emergency services i.e. Local Authorities, Fire and Rescue, Civil Defence and An Garda Siochana through the SFRA; and
- Awareness of risks and evacuation procedures and the need for family flood plans

Access and Egress During Flood Events

Applications for developments in flood vulnerable zones shall include details of arrangements for access and egress during flood events. Such details shall specify that:

- flood escape routes have been kept to publicly accessible land; such routes will have signage and other flood awareness measures in place, to inform local communities what to do in case of flooding; and this information will be provided in a welcome pack to new occupants.

Further Information

Further and more detailed guidance and advice can be found at http://www.flooding.ie and in the Building Regulations.

4.3 Integration of other provisions relating to flood risk management into the existing, already in force, Offaly County Development Plan

Other provisions relating to flood risk management, including the following, have also been integrated into the Offaly County Development Plan 2021-2027 at Chapter 3 Climate Action & Energy under "Flood Risk Management":

Table 5 County Development Plan Provisions relating to Flood Risk Management

Provision CAEP-53 It is Council policy to support, in co-operation with the OPW, the implementation of the EU Flood Risk Directive, the Flood Risk Regulations (S.I. No. 122 of 2010) and the 'The Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and Department Circular Pl2/2014 or any updated / superseding version.

CAEP-54 It is Council policy to protect Flood Zone A and Flood Zone B from inappropriate development and direct developments/land uses into the appropriate Flood Zone in accordance with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 (or any superseding document) and the guidance contained in Development Management Standard DMS-106. Where a development/land use is proposed that is inappropriate within the Flood Zone, then the development proposal will need to be accompanied by a Development Management Justification Test and site specific Flood Risk Assessment in accordance with the criteria set out under with The Planning System and Flood Risk Management Guidelines for Planning Authorities 2009 and Circular PL2/2014 (as updated/superseded). In Flood Zone C, (See DMS-106 where the probability of flooding is low (less than 0.1%, Flood Zone C), site-specific Flood Risk Assessment may be required and the developer should satisfy themselves that the probability of flooding is appropriate to the development being proposed. The County Plan SFRA datasets (including Benefitting Lands mapping), emerging CFRAMS mapping (including National Indicative Fluvial mapping), and the most up to date CFRAM Programme climate scenario mapping should be consulted by prospective planning applicants and the planning authority in determining planning applications.

It is Council policy to require a Site-specific Flood Risk Assessment (FRA) for all planning applications in areas at risk of flooding

Provision

(fluvial, pluvial or groundwater), even for developments deemed appropriate in principle to the particular Flood Zone. The detail of these site-specific FRAs will depend on the level of risk and scale of development. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations. The 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (or any superseding document) and available information from the CFRAM Studies shall be consulted with to this effect.

CAEP-56 It is Council policy to ensure that applications to existing developments in flood vulnerable zones provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following - floor levels, internal layout, flood resilient construction, flood resistant construction, emergency response planning, access and egress during flood events.

CAEP-57 It is Council policy to work with other bodies and organisations, as appropriate, to help protect critical infrastructure, including water and wastewater, within the county, from risk of flooding. Any potential future variations to the Plan shall consider, as appropriate any new and/or emerging data, including, when available, any relevant information contained in the CFRAMS Flood Risk Management Plans and as recommended in the SFRA for the Plan.

CAEP-58 It is Council policy to have regard to the findings and recommendations of the current Strategic Flood Risk Assessment prepared as part of the County Development Plan.

CAEP-59 It is Council policy to consult with the Office of Public Works (OPW) in relation to proposed developments in the vicinity of drainage channels and rivers for which the OPW are responsible, and the Council will retain a strip of 10 metres on either side of such channel where required, to facilitate access thereto.

CAEP-60 It is Council policy to consult, where necessary, with Inland Fisheries Ireland, the National Parks and Wildlife Service and other relevant agencies in the construction of flood alleviation measures in Offaly.

CAEP-61 It is Council policy to work with the OPW and other relevant Departments and agencies to implement the recommendations of the CFRAM programme to ensure that flood risk management policies and infrastructure are progressively implemented, and to also work with catchment-based Flood Planning Groups, (including where catchments go beyond the Council's administrative boundary) in the development and implementation of catchment-based strategies for the management of flood risk – including those relating to storage and conveyance.

CAEP-62 It is Council policy that where resources are available and subject to compliance with the Habitats and Birds Directives, the Council will contribute towards the improvement and / or restoration of the natural flood risk management functions of flood plains.

CAEP-63 It is Council policy to take account of and incorporate into local planning policy and decision making, including possible future variations to this plan, the recommendations of the Flood Risk Management Plans (FRMPs), including planned investment measures for managing and reducing flood risk.

12.6.1 Constrained Land Uses

Flood risk areas in settlement plans are represented by a 'Constrained Land Use' designation. This designation generally limits new development, but will facilitate existing development uses within these areas that may require small scale development such as small extensions. Development proposals within these areas shall be accompanied by a detailed Flood Risk Assessment, carried out in accordance with The Planning System and Flood Risk Assessment Guidelines and Circular PL 2/2014 (or as updated), which shall assess the risks of flooding associated with the proposed development.

Proposals shall only be considered favourably where it is demonstrated to the satisfaction of the Planning Authority that they would not have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities, or increase the risk of flooding to other locations and be in accordance with the proper planning and sustainable development of the area.

The nature and design of structural and non-structural flood risk management measures required for development in such areas will also be required to be demonstrated, to ensure that flood hazard and risk will not be increased. Measures proposed shall follow best practice in the management of health and safety for users and residents of the development.

Land Use Zoning Objective – Constrained Land Uses

It is an objective of the Council to:

LUZO-14 Facilitate the appropriate management and sustainable use of flood risk areas designated as 'Constrained Land Use' on Settlement Plan zoning maps.

13.8.3 Flood Risk Assessments

The Council will have regard to the Planning System and Flood Risk Management Guidelines for Local Authorities (DEHLG and OPW 2009) when assessing planning applications. The key requirements for the management of development in areas at risk of flooding include:

• All development proposals within or incorporating areas at moderate to high risk of flooding will require site specific and appropriately detailed Flood Risk Assessments.

• All development proposals within or incorporating areas at moderate or high risk of flooding will require the application of the Development Management Justification Test in accordance with the Planning System and Flood Risk Management-Guidelines for Planning Authorities (DEHLG and OPW, 2009).

• Any proposal that is considered acceptable in principle shall demonstrate the use of the sequential approach to inform the

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site layout and design of development. Proposals shall also demonstrate that mitigation and management measures can be put in place and that the development will not increase flood risk elsewhere.

DMS-106 Flood Risk Assessments

Flood Zones and Appropriate Uses

The table below indicates the types of land uses that are appropriate in each of the Flood Zones identified within the Plan area, in accordance with the 2009 Flood Risk Management Guidelines for Planning Authorities and Departmental Circular PL2/2014 (or any updated/superseding legislation or

policy guidance).

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 in accordance with The Planning System and Flood Risk Management Guidelines 2009 (and as updated).

Flood Zones	Overall probability	Planning implications for land uses		
		Highly Vulnerable Development	Less Vulnerable Development	Water Compatible Development
Flood Zone A	Highest	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Appropriate – screen for flood risk
Flood zone B	Moderate	Inappropriate – if proposed then Justification Test and detailed Flood Risk Assessment is required	Inappropriate due to climate change – if proposed then Justification Test and detailed Flood Risk Assessment is required	Appropriate – screen for flood risk
Flood Zone C	Lowest	Appropriate - detailed Flood Risk Assessment may be required	Appropriate - detailed Flood Risk Assessment may be required	Appropriate – screen for flood risk

Note (refer to Flood Risk Management Guidelines 2009 and 'SFRA for the Offaly County Development Plan 2021-2027' for additional detail):

• Highly Vulnerable Development – Houses, schools, hospitals, residential institutions, emergency services, essential infrastructure, etc.

• Less Vulnerable Development – Economic uses (retail, leisure, warehousing, commercial, industrial, non-residential institutions, etc.), land and buildings used for agriculture or forestry, local transport infrastructure, etc.

• Water Compatible Development – Docks, marinas, wharves, water based recreation and tourism (excluding sleeping accommodation), amenity open space, sports and recreation, flood control infrastructure, etc.

Site-Specific Flood Risk Assessments

The detail of these site-specific FRAs will depend on the level of risk and scale of development but it is advised that The Planning System and Flood Risk Management, Guidelines for Planning Authorities (DEHLG and OPW, 2009) (or any superseding document) and available information from CFRAM Studies, including existing and emerging CFRAMS mapping (including National Indicative Fluvial mapping) and the most up to date CFRAM Programme climate scenario mapping shall be consulted with to this effect. A detailed site-specific FRA should quantify the risks, the effects of selected mitigation and the management of any residual risks. The assessments shall consider and provide information on the implications of climate change with regard to flood risk in relevant locations.

Structural and Non-Structural Risk Management Measures in Flood Vulnerable Zones

Applications for development in flood vulnerable zones shall provide details of structural and non-structural risk management measures to include, but not be limited to specifications of the following:

Floor Levels

In areas of limited flood depth, the specification of the threshold and floor levels of new structures shall be raised above expected flood levels to reduce the risk of flood losses to a building, by raising floor heights within the building structure using a suspended floor arrangement or raised internal concrete platforms.

When designing an extension or modification to an existing building, an appropriate flood risk reduction measure shall be specified to ensure the threshold levels into the building are above the design flood level. However, care must also be taken to ensure access for all is provided in compliance with Part M of the Building Regulations.

Where threshold levels cannot be raised to the street for streetscape, conservation or other reasons, the design shall specify a mixing of uses vertically in buildings - with less vulnerable uses located at ground floor level, along with other measures for dealing with residual flood risk.

Internal Layout

Internal layout of internal space shall be designed and specified to reduce the impact of flooding [for example, living accommodation, essential services, storage space for provisions and equipment shall be designed to be located above the predicted flood level]. In addition, designs and specifications shall

ensure that, wherever reasonably practicable, the siting of living accommodation (particularly sleeping areas) shall be above flood level.

With the exception of single storey extensions to existing properties, new single storey accommodation shall not be deemed

Provision

appropriate where predicted flood levels are above design floor levels. In all cases, specifications for safe access, refuge and evacuation shall be incorporated into the design of the development.

Flood-Resistant Construction

Developments in flood vulnerable zones shall specify the use of floodresistant construction aimed at preventing water from entering buildings – to mitigate the damage floodwater caused to buildings.

Developments shall specify the use of flood resistant construction prepared using specialist technical input to the design and specification of the external building envelope – with measures to resist hydrostatic pressure (commonly referred to as "tanking") specified for the outside of the building fabric.

The design of the flood resistant construction shall specify the need to protect the main entry points for floodwater into buildings - including doors and windows (including gaps in sealant around frames), vents, air-bricks and gaps around conduits or pipes passing through external building fabric.

The design of the flood resistant construction shall also specify the need to protect against flood water entry through sanitary appliances as a result of backflow through the drainage system.

Flood-Resilient Construction

Developments in flood vulnerable zones that are at risk of occasional inundation shall incorporate design and specification for flood resilient construction which accepts that floodwater will enter buildings and provides for this in the design and specification of internal building services and finishes. These measures limit damage caused by floodwater and allow relatively quick recovery.

This can be achieved by specifying wall and floor materials such as ceramic tiling that can be cleaned and dried relatively easily, provided that the substrate materials (for example, blockwork) are also resilient. Electrics, appliances and kitchen fittings shall also be specified to be raised above floor level, and one-way valves shall be incorporated into drainage pipes.

Emergency Response Planning

In addition to considering physical design issues for developments in flood vulnerable zones, the developer shall specify that the planning of new development also takes account of the need for effective emergency response planning for flood events in areas of new development.

Applications for developments in flood vulnerable zones shall provide details that the following measures will be put in place and maintained:

• Provision of flood warnings, evacuation plans and ensuring public awareness of flood risks to people where they live and work;

• Coordination of responses and discussion with relevant emergency services i.e. Local Authorities, Fire and Rescue, Civil Defence and An Garda Siochána through the SFRA; and

• Awareness of risks and evacuation procedures and the need for family flood plans.

Access and Egress During Flood Events

Applications for developments in flood vulnerable zones shall include details of arrangements for access and egress during flood events. Such details shall specify that:

· flood escape routes have been kept to publicly accessible land;

• such routes will have signage and other flood awareness measures in place, to inform local communities what to do in case of flooding; and

• this information will be provided in a welcome pack to new occupants.

Further Information

Further and more detailed guidance and advice can be found at http://www.flooding.ie and in the Building Regulations.

4.4 Integration of other provisions relating to flood risk management into the Local Area Plan

Further to the measures integrated into the existing, already in force, Offaly County Development Plan 2021-2027 (see Sections 4.2 and 4.3 above), a number of measures relating to flood risk and drainage have been integrated into the Local Area Plan as detailed on Table 6 below. In combination, these provisions contribute towards a sustainable drainage strategy for the Plan area (see also Section 3.5 of this document).

Table 6 Local Area Plan Provisions relating to Flood Risk Management

Provision
As per Section 8.4.2 "Flood Risk Management" of the Plan: The Council recognises that climate change will have significant impacts on flooding, flood risk and flood risk management. This Local Area Plan, informed by a Strategic Flood Risk Assessment (SFRA) and which complies with 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'.
Flood Risk Assessments shall apply the precautionary approach recommended in the Guidelines and shall be informed by the advice on the expected impacts of climate change and the allowances to be provided for future flood risk management provided in the OPW's (2019) Flood Risk Management Climate Change Sectoral Adaptation Plan. New developments will be required to ensure that access is preserved for the maintenance of the Drainage District.
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. Development Management Standard 106 from Chapter 13 Development Management Standards of the Offaly County Development Plan 2021-2027 shall apply to proposals located on lands designated Constrained Land Use in the Local Plan
Area. All flood zones are subject to FRA of flood hazards from other sources, which should assess all potential sources of flooding that may affect the site – from rivers, streams, surface water run-off, sewers, groundwater, reservoirs, canals and
other artificial sources or any combination of these. CAP-08 Incorporate Sustainable Urban Drainage Systems and other nature-based surface water drainage solutions as part of all proposed developments.
 CAO-05 Co-operate with the Office of Public Works (OPW) in the delivery of the Birr Flood Relief Scheme that may be brought forward in the lifetime of this Plan. CIP-05 Ensure that new cycling and walking infrastructure, including the provision of new cycling hubs / parks, shall be provided subject to environmental constraints, including those related to habitats and potential impacts such as
disturbance from lighting; this will include minimising river crossings, avoiding sensitive habitats, not increasing barriers to flood waters and sustainable design and construction techniques. CIP-07 Maintain and enhance the existing surface water drainage systems in Birr and to protect surface and ground water quality in accordance with the Water Framework Directive.
CIP-08 Require that all development proposals demonstrate that appropriate Sustainable Urban Drainage Systems (SuDS) and other nature-based solutions are examined and provided. CIP-09 Manage flood risk in Birr in conjunction with the Office of Public Works and in accordance with the requirements
of the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and circular PL02/2014 (August 2014). CIO-07 To support and work in co-operation with the OPW in the implementation of the Birr Flood Relief Scheme.
TCP-16 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. BGI0-05 In conjunction with the appropriate prescribed bodies, to investigate the feasibility of providing a Wetland
Amenity Area at Syngefield and on the Little Brosna Flood Plain taking into account the environmental sensitivities of the site and Inland Fisheries Guidance document, Planning for Watercourses in the Urban Environment. BGIP-06 Support the following restoration and conservation works to protect and enhance water quality of the Camcor River and the Little Brosna River and the biodiversity value of riverbanks during the Plan Period; • Planting of trees and riparian plants;
 Planting of flees and hpantal plants; Riparian management work; Techniques to manage rainwater or soiled water ingress to rivers; River restoration works;
 Fish passage – e.g. modification of weirs; Invasive species control; Silt trapping;
 Nature-based Sustainable Urban Drainage Systems (SuDS) – e.g. natural flood retention measures (NFRM), bio-swales, raingardens, water butts; Pond creation and biodiversity habitats; Constructed wetlands;
 Wild flower meadows; and Rare species conservation initiatives. BGIO-06 Support the preparation of a Conservation Management Plan for the Syngefield Demesne, Woodlands and the section of the Camcor River that passes the Demesne.

4.5 Instance whereby Environmental Assessment Recommendation was not integrated into the Plan

All environmental assessment (SEA, AA and SFRA) recommendations were integrated into the Plan, except the addition of the **bold text** below to LUZO-13 "Land Use Zoning Objective – Constrained Land Uses".

"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." New development will generally be limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B, and a detailed SSFRA will be required in these areas.

Footnote:

For example, at undeveloped Enterprise and Employment lands in the south of the town to the west of the N62 (marked * on Map X) new development will be limited to water-compatible uses in Flood Zone A.

The planning reasons for the Members not agreeing to the insertion of the bold text above into the Plan was that the that the **bold text** above is sufficiently addressed in other sections of the Local Area Plan and the County Development Plan, including as follows:

• Local Area Plan 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."

• Local Area Plan Section 8.4.2 "Flood Risk Management"

"Development Management Standard 106 from Chapter 13 Development Management Standards of the Offaly County Development Plan 2021-2027 shall apply to proposals located on lands designated Constrained Land Use in the Local Plan Area."

• County Development Plan Development Management Standard 106 includes details from the Flood Risk Management Guidelines on what types of uses are appropriate in each Flood Zone and details on requirements in relation to Site-specific Flood Risk Assessments.

Section 5 Conclusion

Offaly Council has adopted a new Local Area Plan (LAP) for Birr under the Planning and Development Act 2000 (as amended). The Plan sets out an overall strategy for the proper planning and sustainable development over the years 2023-2029.

LAPs are required to be consistent with the policies and objectives of the County Development Plan and its Core Strategy, as well as the National Planning Framework and Regional Spatial Economic Strategies.

The LAP should be read in conjunction with the Offaly County Development Plan 2021-2027, which sets out the overarching development strategy for the County. Where conflicting objectives arise between the County Development Plan and the LAP, the objectives of the relevant County Development Plan shall take precedence.

The general development management standards, zoning matrix/descriptions and policies and objectives in the County Development Plan applicable to settlements (including provisions relating to environmental protection and management) can be applied to the LAP boundary area, while additional policies and objectives that are specific to Birr are included in the LAP.

Land use zonings are already in force through the Offaly County Development Plan 2021-2027 and are reproduced in the LAP. In addition, the land use zoning map in the LAP, corrects a number of relatively minor anomalies¹¹.

The detailed Offaly County Development Plan 2021-2027 preparation process undertaken by the Planning Department combined with specialist input from the SFRA process for the Offaly County Development Plan 2021-2027 facilitated zoning that avoids inappropriate development being permitted in areas of high flood risk. Flood and drainage related provisions have been integrated into both the LAP and the existing Offaly County Development Plan 2021-2027.

This Strategic Flood Risk Assessment (SFRA) document has been prepared alongside the LAP taking into account *The Planning System and Flood Risk Management - Guidelines for Planning Authorities* (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Department of the Environment, Community and Local Government Circular PL 2/2014.

¹¹ For example:

Changing zoning to Open Space and Amenities to facilitate Potential Biodiversity Zones and potential development of wetlands;
 Changing zoning of lands from New Peridential to Evicting Peridential to be consistent with the County Development Plan as to

Changing zoning of lands from New Residential to Existing Residential, to be consistent with the County Development Plan as to how
vacant sites adjacent to existing residential areas were treated when it came to zoning;
 Changing zoning residential was present at lands, and

Changing zoning reflect Existing Residential uses present at lands; and
 Changing zoning from New Desidential to white land(act zoned, to r

[•] Changing zoning from New Residential to white land/not zoned, to reflect how roads, footpaths and turning circles are treated elsewhere in the Local Area Plan and County Development Plan.

Appendix I: Summary of the requirements of the Flood Guidelines for land uses in Flood Zones

Requirements relating to land uses in Flood Zones as set out in the Department of Environment, Heritage and Local Government (DEHLG) and Office of Public Works (OPW) 2009 Flood Guidelines (including at Chapter 3 Principles and Key Mechanisms and Chapter 5 Flooding and Development Management) and Departmental Circular PL2/2014 should be adhered to.

- The Sequential Approach, including the Justification test -

The key principles of the Guidelines' risk-based sequential approach (see Figure 1) are:

- Avoid development in areas at risk of flooding. If this is not possible, consider substituting a land use that is less vulnerable to flooding. Only when both avoidance and substitution cannot take place should consideration be given to mitigation and management of risks.
- Inappropriate types of development that would create unacceptable risks from flooding should not be planned for or permitted.
- Exceptions to the restriction of development due to potential flood risks are provided for through the use of a Justification Test, where the planning need and the sustainable management of flood risk to an acceptable level must be demonstrated.

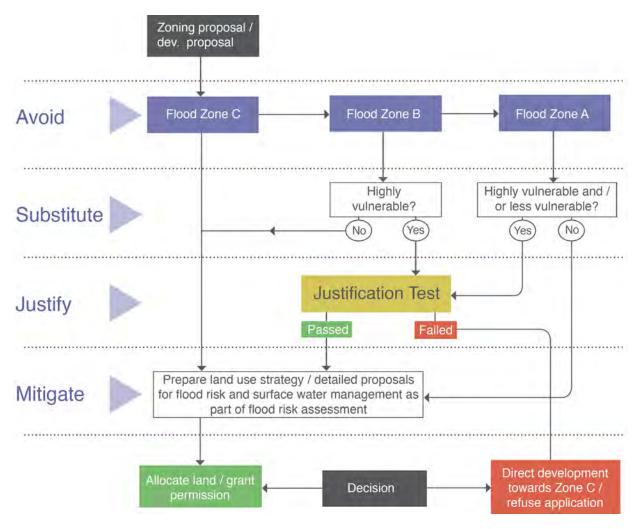


Figure 1 Sequential Approach Process¹²

In summary, the **planning implications** for each of the flood zones are:

Zone A - High probability of flooding. Most types of development would be considered inappropriate in this zone. Development in this zone should be avoided and/or only considered in exceptional circumstances, such as in city and town centres, or in the case of essential infrastructure that cannot be located elsewhere, and where the Justification Test has been applied. Only water-compatible development, such as docks and marinas, dockside activities that require a waterside location, amenity open space, outdoor sports and recreation, would be considered appropriate in this zone.

Zone B - Moderate probability of flooding. Highly vulnerable development, such as hospitals, residential care homes, Garda, fire and ambulance stations, dwelling houses and primary strategic transport and utilities infrastructure, would generally be considered inappropriate in this zone, unless the requirements of the Justification Test can be met. Less vulnerable development, such as retail, commercial and industrial uses, sites used for short-let for caravans and camping and secondary strategic transport and utilities infrastructure, and water-compatible development might be considered appropriate in this zone. In general however, less vulnerable development should only be considered in this zone if adequate lands or sites are not available in Zone C and subject to a flood risk assessment to the appropriate level of detail to demonstrate that flood risk to and from the development can or will adequately be managed.

Zone C - Low probability of flooding. Development in this zone is appropriate from a flood risk perspective (subject to assessment of flood hazard from sources other than rivers and the coast) but

¹² Flood Zone C covers all areas outside of Zones A and B

would need to meet the normal range of other proper planning and sustainable development considerations.

Table 7 overleaf classifies the vulnerability of different types of development while Table 8 identifies the appropriateness of development belonging to each vulnerability class within each of the flood zones as well as identifying what instances in which the Justification Test should be undertaken. Inappropriate development that does not meet the criteria of the Justification Test should not be considered at the plan-making stage or approved within the development management process.

Vulnerability class	Land uses and types of development which include*:
Highly vulnerable	Garda, ambulance and fire stations and command centres required to be operational during flooding;
development (including	Hospitals;
essential	Emergency access and egress points;
infrastructure)	Schools;
	Dwelling houses, student halls of residence and hostels;
	Residential institutions such as residential care homes, children's homes and social services homes;
	Caravans and mobile home parks;
	Dwelling houses designed, constructed or adapted for the elderly or, other people with impaired mobility; and
	Essential infrastructure, such as primary transport and utilities distribution including electricity generating power stations and sub-stations, water and sewage treatment, and potential significant sources of pollution (SEVESC sites, IPPC sites, etc.) in the event of flooding.
Less vulnerable	Buildings used for: retail, leisure, warehousing, commercial, industrial and non-residential institutions;
development	Land and buildings used for holiday or short-let caravans and camping subject to specific warning and evacuation plans;
	Land and buildings used for agriculture and forestry;
	Waste treatment (except landfill and hazardous waste);
	Mineral working and processing; and
	Local transport infrastructure.
Water-	Flood control infrastructure;
compatible development	Docks, marinas and wharves;
development	Navigation facilities;
	Ship building, repairing and dismantling, dockside fish processing and refrigeration and compatible activities requiring a waterside location;
	Water-based recreation and tourism (excluding sleeping accommodation)
	Lifeguard and coastguard stations;
	Amenity open space, outdoor sports and recreation and essential facilities such as changing rooms; and
	Essential ancillary sleeping or residential accommodation for staff required by uses in this category (subject to a specific warning and evacuation plan).

Table 7 Classification of vulnerability of different types of development

*Uses not listed here should be considered on their own merits

Table 8 Vulnerability Classes and Flood Zones

	Flood Zone A	Flood Zone B	Flood Zone C
Highly vulnerable development (including essential infrastructure)	Justification Test	Justification Test	Appropriate
Less vulnerable development	Justification Test	Appropriate	Appropriate
Water-compatible development	Appropriate	Appropriate	Appropriate

The **Justification Test** which is referred to as part of the Sequential Approach is an assessment of whether a development proposal within an area at risk of flooding meets specific criteria for proper planning and sustainable development and demonstrates that it will not be subject to unacceptable risk nor increase flood risk elsewhere. The Justification Test should be applied only where development is within flood risk areas that would be defined as inappropriate under the screening test of the sequential risk based approach outlined above. This Justification Test is shown below.

Where, as part of the preparation and adoption or variation and amendment of a development/local area plan¹, a planning authority is considering the future development of areas in an urban settlement that are at moderate or high risk of flooding, for uses or development vulnerable to flooding that would generally be inappropriate as set out in Table 3.2, all of the following criteria must be satisfied:

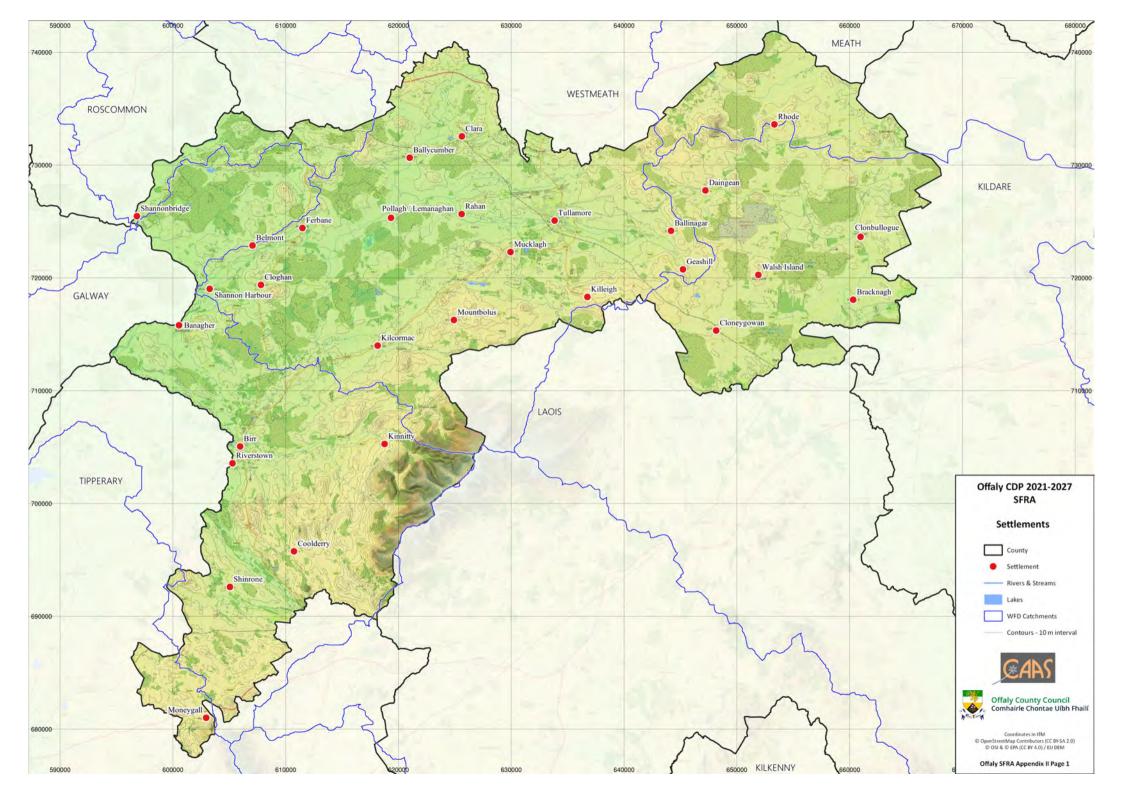
- 1 The urban settlement is targeted for growth under the National Spatial Strategy, regional planning guidelines, statutory plans as defined above or under the Planning Guidelines or Planning Directives provisions of the Planning and Development Act, 2000, as amended.
- 2 The zoning or designation of the lands for the particular use or development type is required to achieve the proper planning and sustainable development of the urban settlement and, in particular:
 - Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement²;
 - (ii) Comprises significant previously developed and/or under-utilised lands;
 - (iii) Is within or adjoining the core³ of an established or designated urban settlement;
 - (iv) Will be essential in achieving compact and sustainable urban growth; and
 - (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement⁴.
- 3 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.

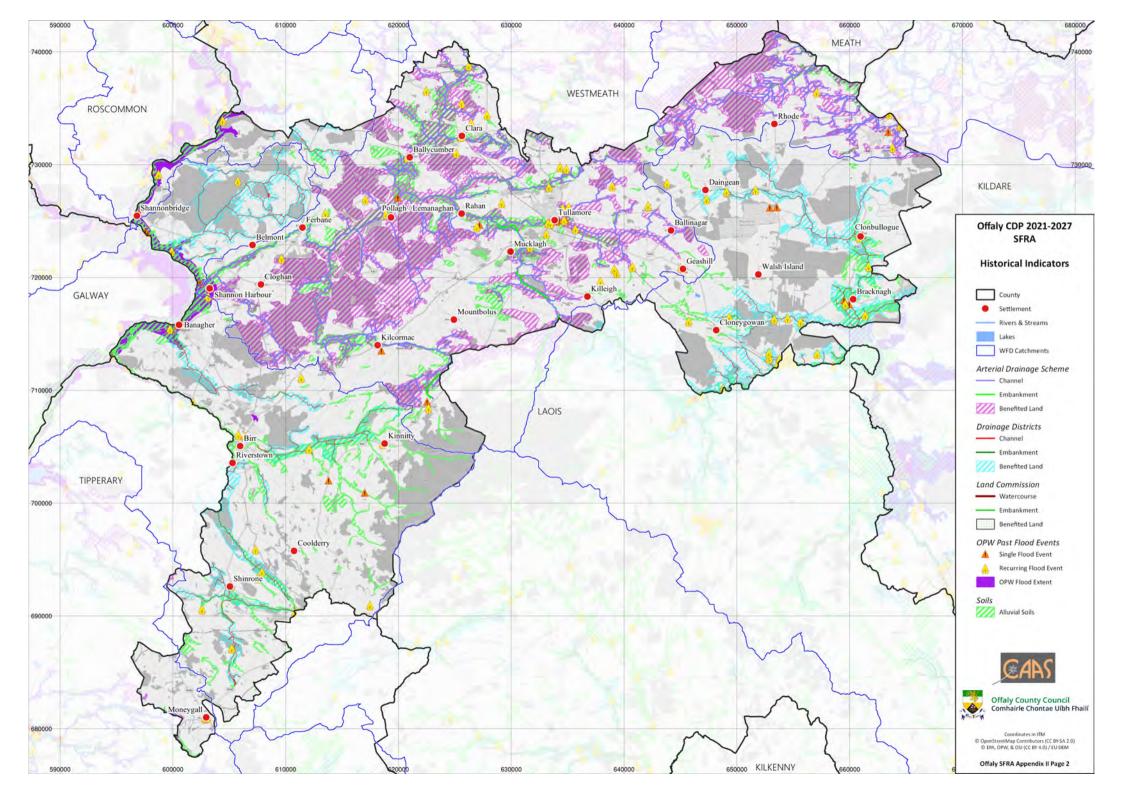
N.B. The acceptability or otherwise of levels of any residual risk should be made with consideration for the proposed development and the local context and should be described in the relevant flood risk assessment.

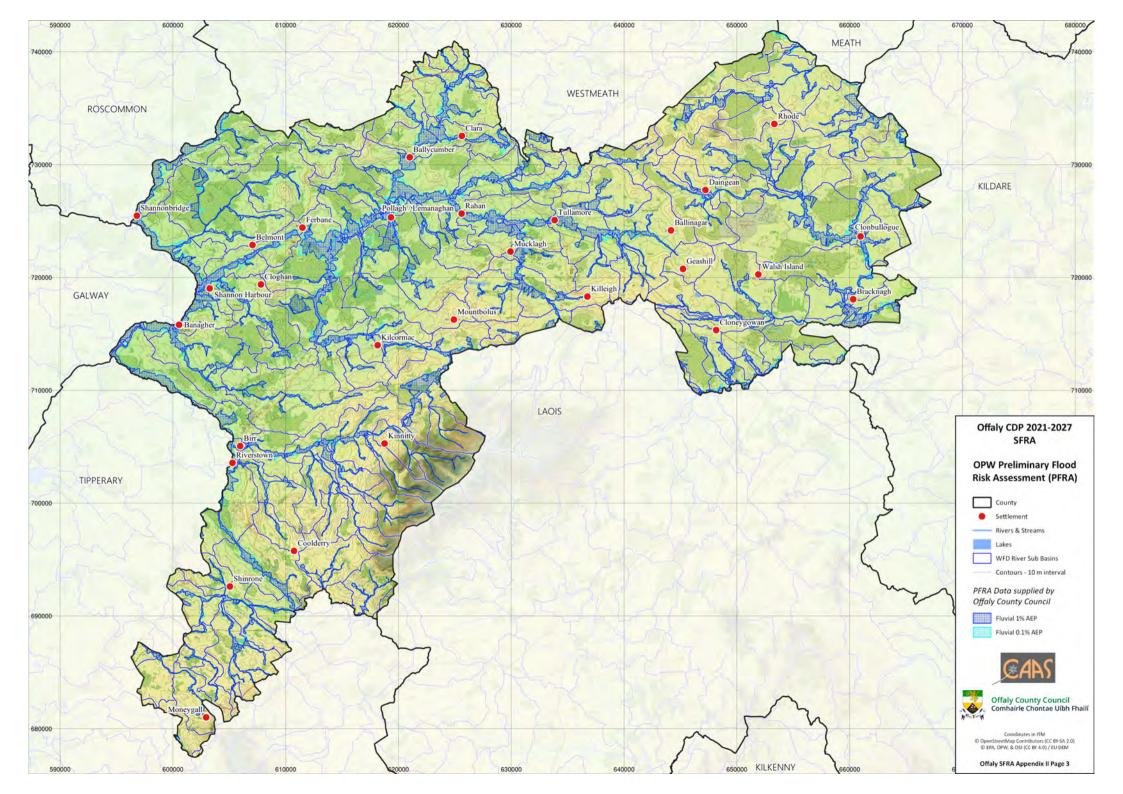
Figure 2 Justification Test ¹³

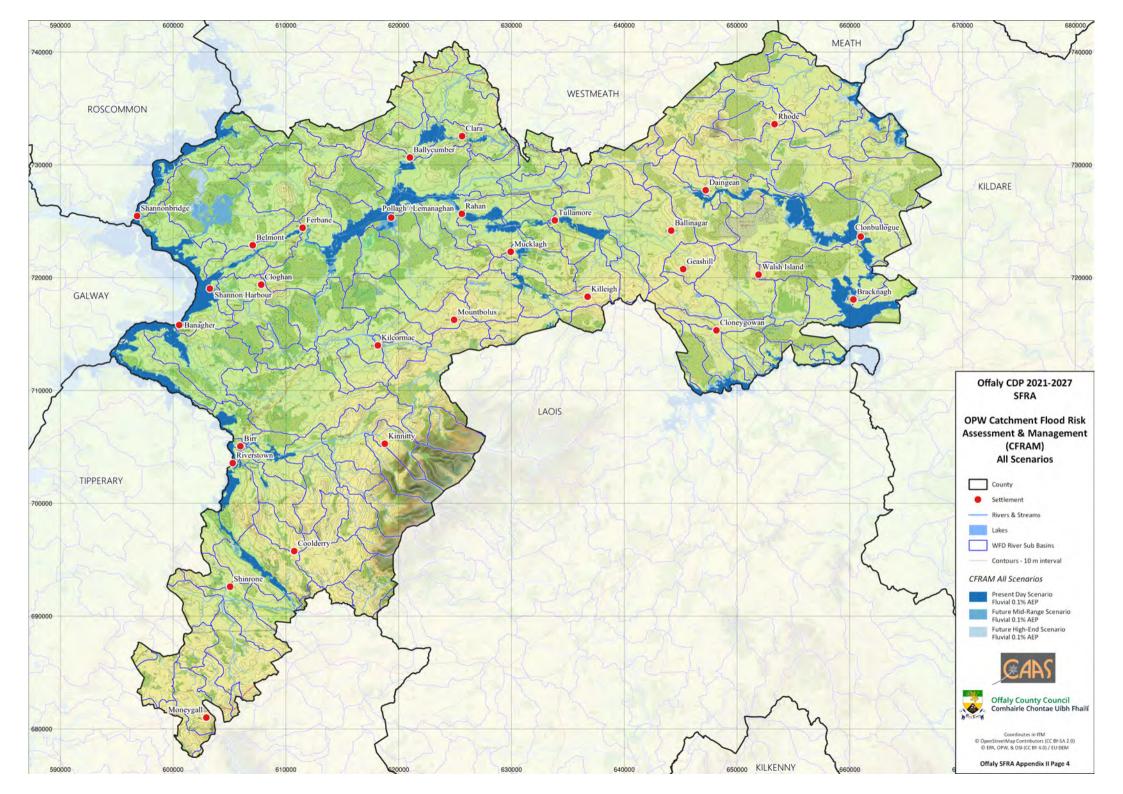
¹³ Footnotes: ¹ Including Strategic Development Zones and Section 25 Schemes in the area of the Dublin Docklands Development Authority ²In the case of Gateway planning authorities, where a number of strategic growth centres have been identified within the overall area of the authority, the Justification Test may be applied for vulnerable development within each centre. ³ See definition of the core of an urban settlement in Glossary of Terms. ⁴ This criterion may be set aside where section 4.27b applies.

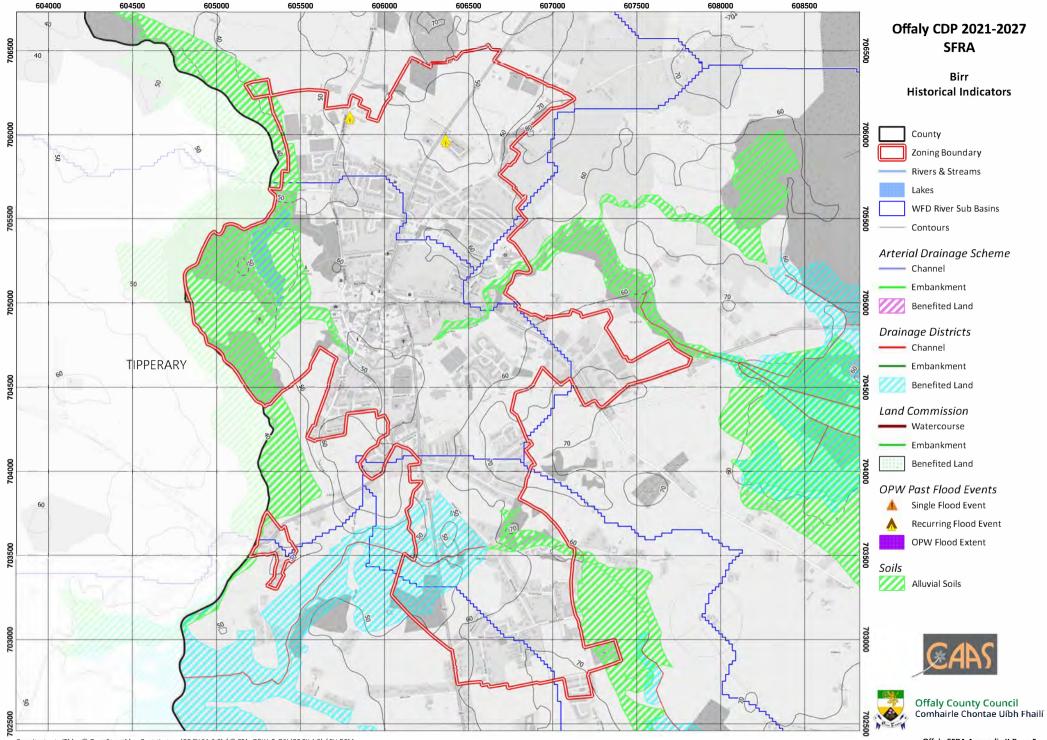
Appendix II: Flood Risk Indicator and Zone Mapping





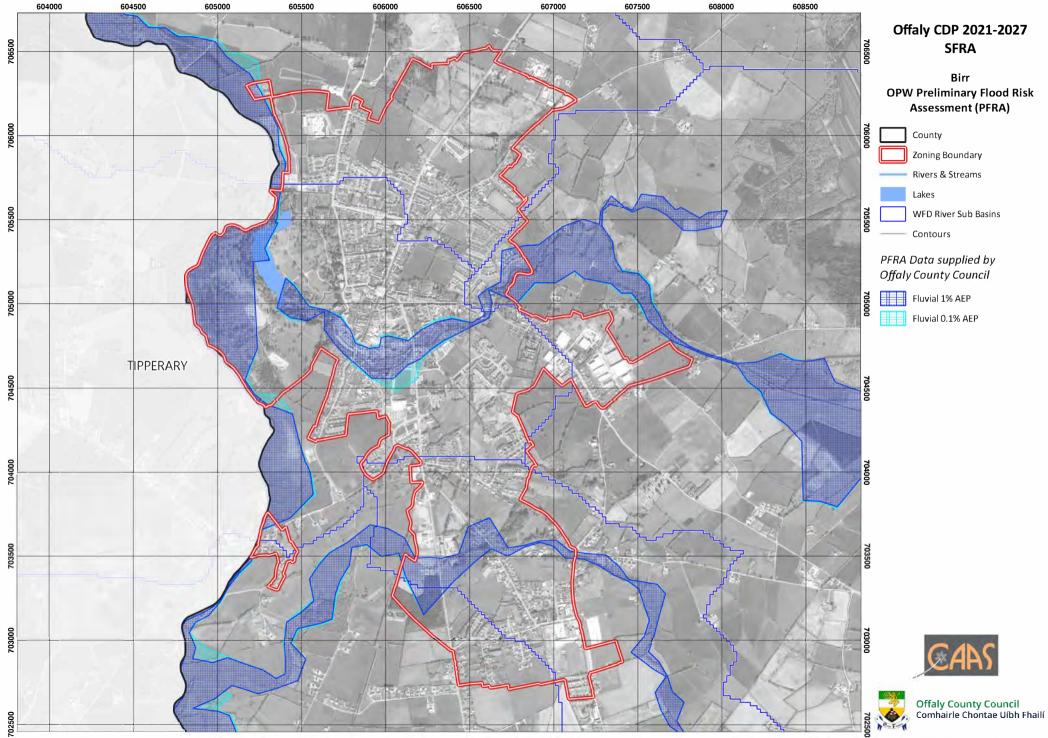






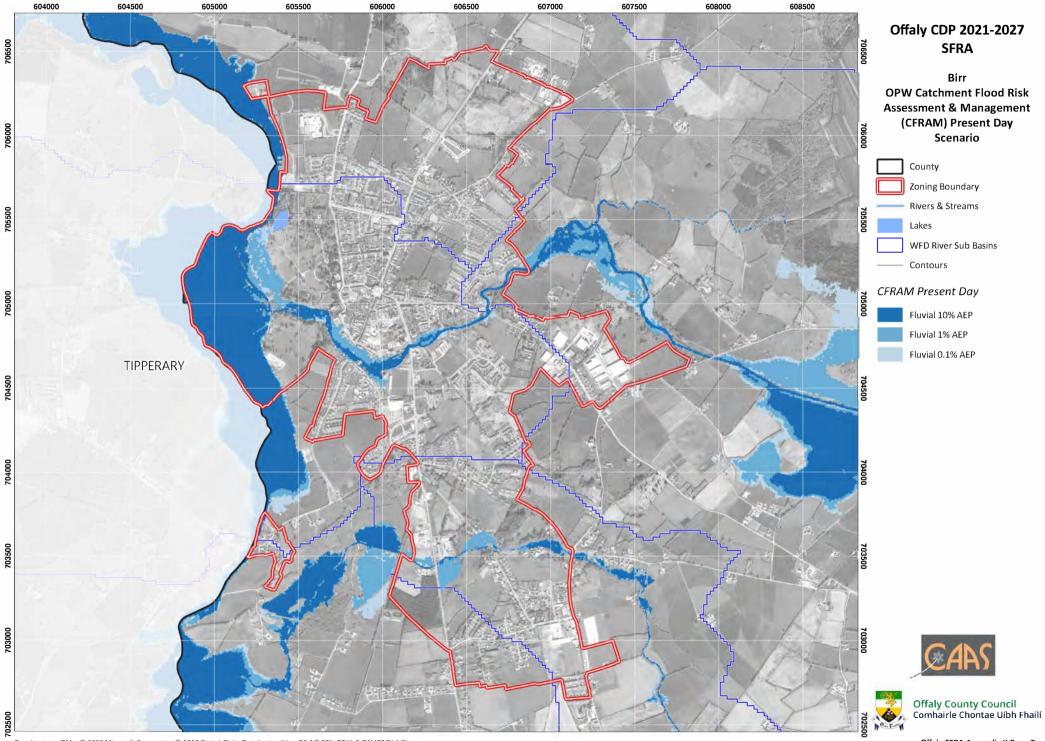
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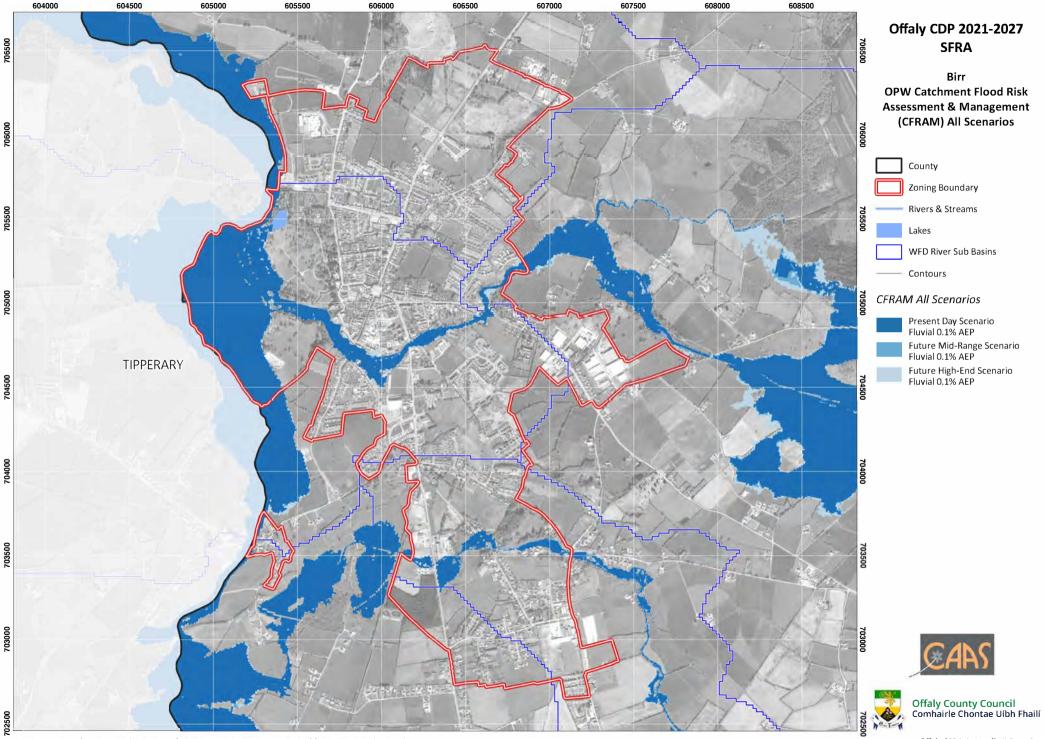
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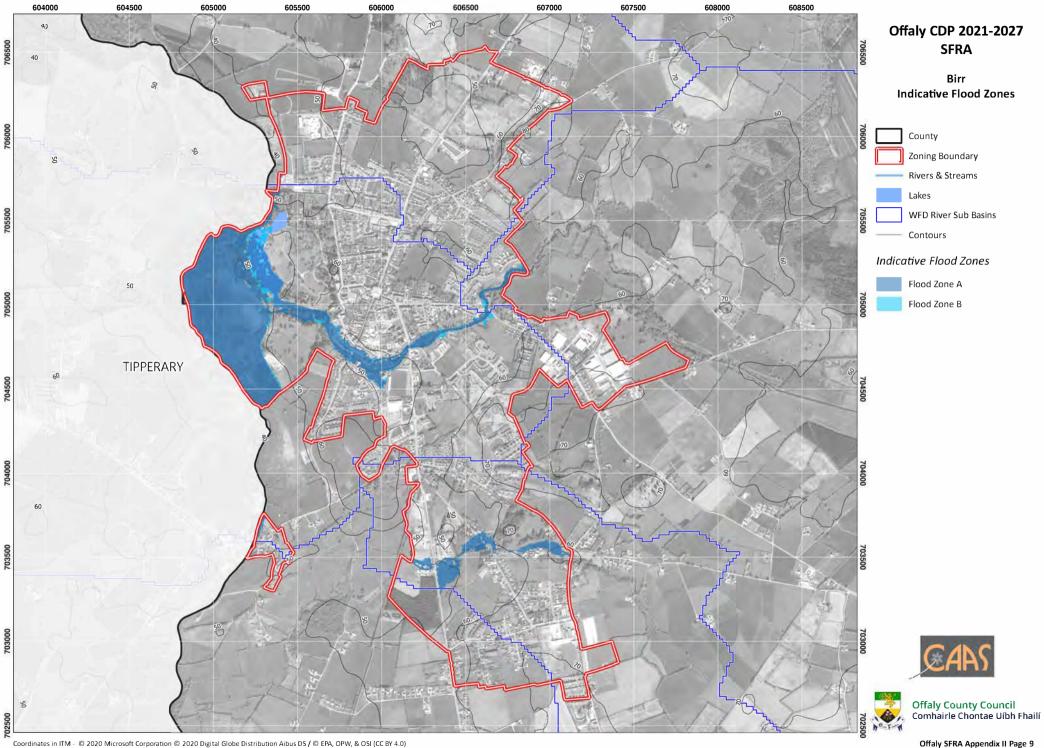
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