



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

14/07/2021

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

Dear Sir/Madam,

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

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

Material Alteration MA53

The OPW welcomes proposed MA53 to include additional text describing the Council's approach to zoning in flood risk areas, "*A precautionary approach has largely been employed to landuse zoning to avoid directing development towards areas at risk of flooding. Under the Plan, no highly or less vulnerable land uses are being proposed on undeveloped lands in Flood Zone A (high flood risk) and no highly vulnerable land uses are being proposed on undeveloped lands in Flood Zone B (moderate flood risk). This is because a Constrained Land Uses designation (see Section 12.6.1 and the SFRA that accompanies the Plan) is being applied through the Plan across all undeveloped lands within Flood Zones A and B*".

The OPW recommend that the Constrained Land Uses designation as described in the last sentence of the material alteration should be applied to all land within Flood Zone A and B.

Material Alteration MA69

The additional text to CAEP-50 proposed in MA69 to ensure all flood risk datasets are assessed and climate change is considered is welcomed by OPW. "*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 noted that National Indicative Fluvial Mapping (NIFM) is referenced in the updated objective.



National Indicative Fluvial Mapping (NIFM)

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

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

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

Consideration of Climate Change Impacts

The Chief Executive's report notes the provision for climate change in policy objectives CAEP-51, CAEP-52 and development management standard. These objectives and development management standard are in relation to site-specific flood risk assessments. The OPW recommend that the Draft Plan details how climate change has been considered in the production of this development plan.

The Guidelines state that a precautionary approach to climate change should be applied and a cautious approach to zoning in potential transitional areas. Planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives. It should be noted that the flood maps prepared under the CFRAM and NIFM Programmes include maps for two potential future scenarios taking account of different degrees of climate impact.

Specific Settlements

Tullamore

The OPW welcomes MA268 - MA272 to rezone undeveloped sites located within the Constrained Land Use zoning to *Open Space, Amenity and Recreation*.

The OPW intends to carry out a review of the flood maps Tullamore, taking into account the changes that have occurred since they were produced in 2016. The OPW are aware of the project being undertaken by Offaly County Council to construct various water quality features along the Tullamore River. The OPW's flood map review will commence once Offaly County Council have confirmed that the works on the watercourse have been completed.

Ferbane

The OPW welcomes MA332 – MA334 to rezone undeveloped sites located within the Constrained Land Use zoning to *Open Space, Amenity and Recreation*.



Killeigh

The OPW welcomes MA363 to rezone an undeveloped *Community/Facilities Services* site located within the Constrained Land Use zoning to *Open Space, Amenity and Recreation*.

Rahan

Rahan is proposed to be changed from a Sráid to a Village and a flood zone map for the settlement has therefore been included. The OPW recommend that the historical indicators and predictive indicators maps, as were included in the SFRA for other settlements in Offaly, should also be produced.

Please note that there is an Arterial Drainage Scheme in the area. Consideration should be given in zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas. The location of Arterial Drainage Schemes and Drainage Districts may be viewed on www.floodinfo.ie.

Moneygall

It is noted that a groundtruthing exercise was undertaken for Moneygall. This has confirmed that the *Enterprise and Employment* site, which was partially within Flood Zone A in the original draft plan, is not at risk of flooding and Offaly County Council have updated the flood zone mapping for Moneygall accordingly.

If further information or input is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Draft Offaly County Development Plan 2021- 2027 Yours sincerely,

__Níall Murphy_

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments