



Planning Department,  
Tipperary County Council,  
Civic Offices,  
Emmet Street,  
Clonmel,  
Co Tipperary,  
E91 N512

11/09/2023

**RE: Draft Clonmel Local Area Plan 2024-2030**

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Clonmel Local Area Plan for the period 2024 – 2030.

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

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

- The commitment to managing flood risk in line with the Guidelines, Policy 8.5
- Policy 8.4 and Objective 8C in relation to integrating SuDS and nature-based solutions into all development proposals and new public realm and public sector development

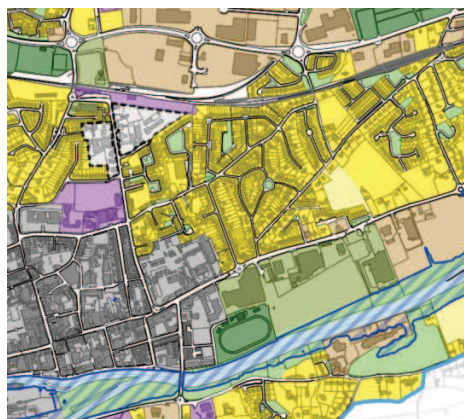
The following comments highlight opportunities for the Draft Plan before it is finalised.

**Flood Zones**

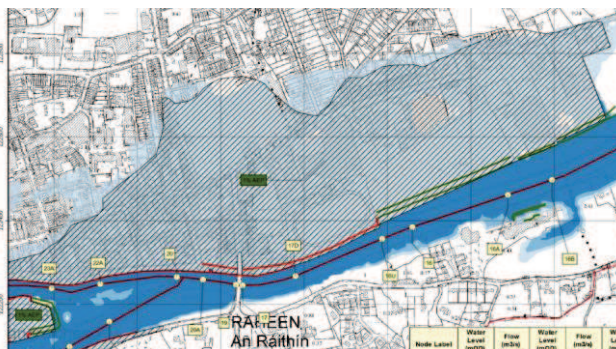
It should be noted that the Flood Zones are defined ignoring the presence of flood defences (Section 2.25 of the Guidelines). The Flood Zones are underestimated in the draft plan as they have excluded areas benefitting from flood defences from the Flood Zones.

Lands that benefit from flood defences are available to view on the CFRAM PDF Maps on the website [floodinfo.ie](http://floodinfo.ie).

Based on the above, the OPW recommend revising the Flood Zones and reviewing the implications for any zonings impacted.



Zone Mapping

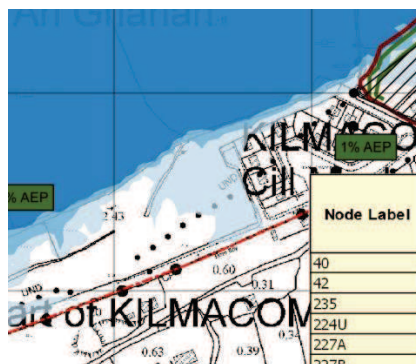


National CFRAM PDF Map, showing defended areas

There is a proposed *New Residential* zoning which can be seen to be located within 0.1% AEP extents on the National CFRAM PDF maps. Residential development is considered highly vulnerable type development and not appropriate in Flood Zone B. The OPW recommends that the lands be rezoned as less vulnerable or water compatible type development, unless it can be demonstrated by the Planning Authority that all criteria of the Plan Making Justification Test have been satisfied.



Zone Mapping, Proposed New Residential Zoning



National CFRAM PDF Map (0.1%AEP is the lightest shade of blue)

Only the 0.1% AEP extents for the National Indicative Fluvial Mapping Programme have been considered when producing the Flood Zones. The 1% AEP extents should also be used to inform the Flood Zone Mapping, i.e. Flood Zone A.



SFRA, NIFM Present Day



SFRA, Flood Zones A and B



## Justification Test

The OPW welcomes the Plan-making Justifications supplied for Clonmel.

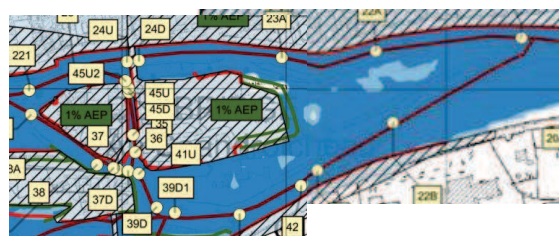
For the lands considered to benefit from the existing flood relief scheme in the town Tipperary County Council should consider including discussion on the residual risks.

### **Regeneration Site - 11. Suir Island Gardens**

The north-western part of the proposed development on Suir Island is zoned as *Urban Core* and is noted as being “*suitable for mixed-use development with a focus on residential*”. Some lands on Suir Island benefit from the existing flood defence scheme however it is unclear if the proposed development will be located within these lands. Tipperary County Council might confirm if the lands are within the defended area and how the residual risks will be managed, or if outside the defended area then provide discussion on the proposed mitigation measures.



Regeneration Site No 11



National CFRAM PDF Map, showing defended areas

## Regeneration Site

Only some of the regeneration sites described in Appendix 3 are noted as requiring a site-specific flood risk assessment, however there are sites that are located in areas that benefit from the existing flood relief scheme or are located in 0.1% AEP National CFRAM extents that also require site-specific flood risk assessments.

## Town Environs

The OPW welcomes the Note on Land Use Zoning Objectives and Matrix in the draft Plan, which outlines that uses shall be limited to water-compatible uses in Flood Zone A, and less vulnerable or water compatible uses in Flood Zone B, except where a Justification Test has been satisfied. This will ensure that inappropriate development will not be permitted in zonings such as *Town Environs* where a Justification Test would not be appropriate as the zoning cannot satisfy Criteria 2 of the Test.

## Flood Relief Scheme

The OPW acknowledges that Policy 11-11 (b) of the County Development Plan notes that Tipperary County Council will consult the OPW in the vicinity of Flood Relief Schemes for which the OPW are responsible and will retain a strip to facilitate access for maintenance. Tipperary County Council might also consider including a register of other key flood risk infrastructure in the Local Area Plan where it would not otherwise be readily identified or protected from interference or removal.



## **Consideration of Climate Change Impacts**

There are no National CFRAM future scenario mapping available for Clonmel town, as these were not an output of the Clonmel Scheme. The Guidelines recommends; *“Where mathematical models are not available climate change flood extents can be assessed by using the Flood Zone B outline as a surrogate for Flood Zone A with allowance for the possible impacts of climate change”*.

The draft Plan states *“Overlays Land Use Zoning and National CFRAM potential future scenario mapping have been included in the SFRA, while future scenario mapping for the National CFRAM Study has been provided in the SFRA, it has not been overlaid with the land use maps. It should be noted that future scenario mapping is also have for the National Indicative Fluvial Mapping Programme.*

The OPW welcomes that Tipperary County Council has considered climate change in the preparation of this plan by *“avoiding development in areas potentially prone to flooding in the future”*. The OPW also welcomes Policy 8.5 (d) that requiring lands subject to mid-range future scenario flood extents to submit a site-specific flood risk assessment. This will ensure that measures or adaptation measures are considered which could protect development in the future if there are an increase in flood extents due to climate change.

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

## **Nature-based Solutions and SuDS**

The OPW welcomes Policy 8.4 that requires all developments to integrate SuDS and nature-based solutions and Objective 8C to integrate a nature-based solutions approach to SuDS as part of new public realm and public sector development.

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

## **Past Flood Events**

More flood event locations appear to be shown on floodinfo than is illustrated on the Selection of Historical Indicators Map in the SFRA. Tipperary County Council should review and ensure all past flood events have been considered.

## **Errata**

There is a reference to an OPW website [www.cfram.ie](http://www.cfram.ie) in Table 3 Predictive Flood Risk Indicators of the SFRA, this website is no longer available. The OPW recommend referencing [www.floodinfo.ie](http://www.floodinfo.ie).



If further information is required, please do not hesitate to contact the OPW ([floodplanning@opw.ie](mailto:floodplanning@opw.ie)) in advance of the completion of the Draft Clonmel Local Area Plan 2024-2030.

Yours sincerely,

[Redacted signature]

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments