



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

11/09/2023

RE: Draft Nenagh 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 Nenagh 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.

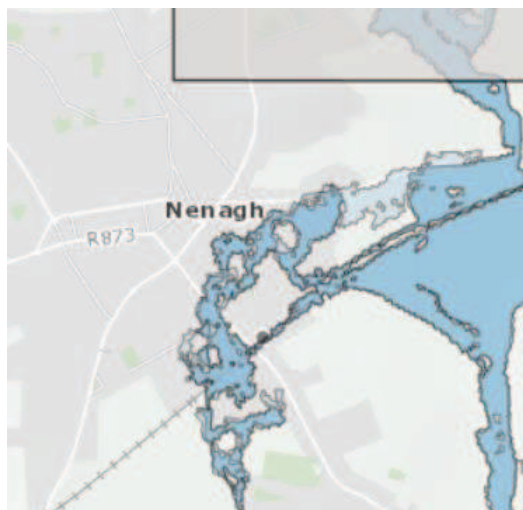
The OPW welcomes the acknowledgement of the Guidelines and the preparation of a Strategic Flood Risk Assessment (SFRA). In particular, the OPW welcomes:

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

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

Flood Zones

The National CFRAM extents have been used to inform the Flood Zones for Nenagh. It would appear that an area of Flood Zone A has been omitted from a section of the Flood Zone Mapping. Tipperary should review and update the mapping. There are regeneration sites in Appendix 3: Schedule of Regeneration Sites which are described as being within Flood Zone B, however they are also located within Flood Zone A such as the sites at the Coalyard, Typone, Martyr's Road and Dublin Road.



Floodinfo, 1% and 0.1% AEP flood extents

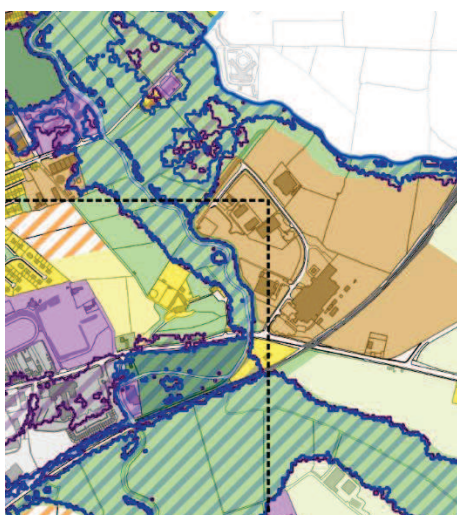


SFRA, Flood Zones A and B

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 at one location 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.

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



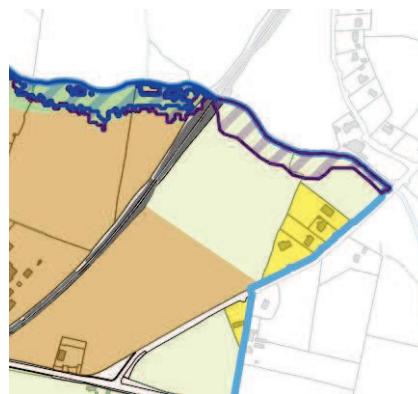
Zone Mapping



National CFRAM PDF Map, showing defended areas



As the National Indicative Fluvial Mapping data has not been included in Appendix II: Flood Risk Indicator and Zone Mapping of the SFRA, it is difficult to assess if the 1% AEP extents for the National Indicative Fluvial Mapping Programme have been considered when producing the Flood Zones on the Zone Mapping.



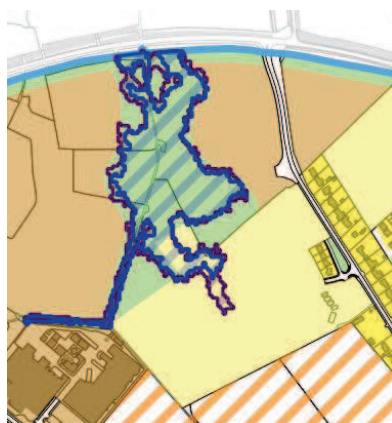
Floodinfo, Present Day 1% and 0.1% AEP extents *SFRA, Flood Zones A and B*

Justification Tests

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

Residential Zoning

There is a *Residential* zoning to the north west of the town, which fails the Plan-making Justification Test however planning permission has already been granted. Residential development is classified as highly vulnerable in the Guidelines and is not appropriate in Flood Zone A and B. Zoning lands in flood risk areas which do not satisfy Criteria 1 and 2 is not in accordance with the Sequential Approach, to avoid and substitute. A Justification Test should only be carried out when avoidance and substitution of the land risk lands is not possible. It is recommended that these lands should be rezoned as water-compatible type zoning such as *Open Space*.



Zoning Map, Residential Zoning in Flood Zone A and B



If it is not possible to avoid these flood risk lands due to the planning permission having been granted then Tipperary County Council should include discussion on the proposed mitigation measures, demonstrate that the flood risk can be managed within the site and that climate change has been considered. If the lands within Flood Zone A and B are not developed before the planning application expires then Tipperary County Council should rezone these lands as a water compatible type zoning such as *Open Space*.

Existing Residential Zonings

Not all existing developed *Residential* lands that are located within Flood Zone A and B have been included in the Plan-making Justification Tests. Tipperary County Council should review that Justification Tests are completed for all land zonings that overlap with the flood zones, where avoidance or substitution is not possible.

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 welcomes Objective 8D to support the design, development and implementation of the Nenagh Flood Relief Scheme. 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.

Arterial Drainage Scheme

The OPW acknowledges Policy 11-11 (a) of the County Development Plan that Tipperary County Council will ensure that proposed development does not have an impact on Arterial Drainage Schemes and Drainage Districts. As there is an Arterial Drainage Scheme in Nenagh Tipperary County Council might consider if this policy objective from the County Development Plan should be included in the Local Area Plan.

Consideration of Climate Change Impacts

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 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 8B 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 twelve regeneration sites or the large land zonings may be considered, where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

Errata

There is a reference to an OPW website 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.

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

Yours sincerely,

[Redacted signature]

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments