



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

11/09/2023

RE: Draft Thurles 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 Thurles 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
- Policy 8.7 and Objective 8D in relation to the proposed flood relief scheme in Thurles

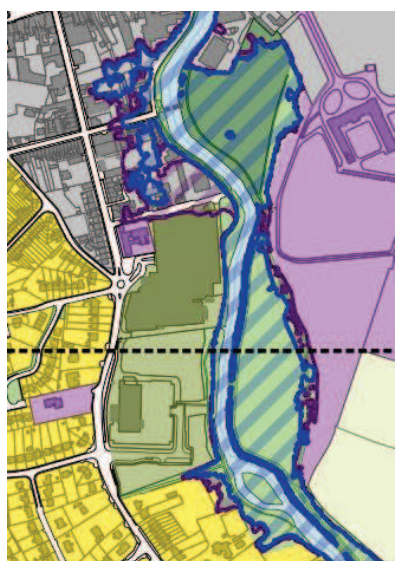
The following comments highlight opportunities for the Draft Plan before it is finalised.

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.

Tipperary County Council will need to update the Flood Zone Mapping at this location and also update the Plan-making Justification Test for the *Urban Core* zoning. This is also the location of proposed regeneration site 3 – Kavanagh Place. For lands considered to benefit from existing defences Tipperary County Council should include discussion on the residual risks.

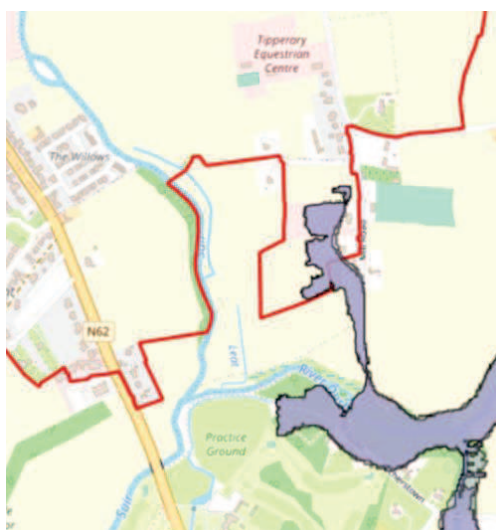


Zone Mapping

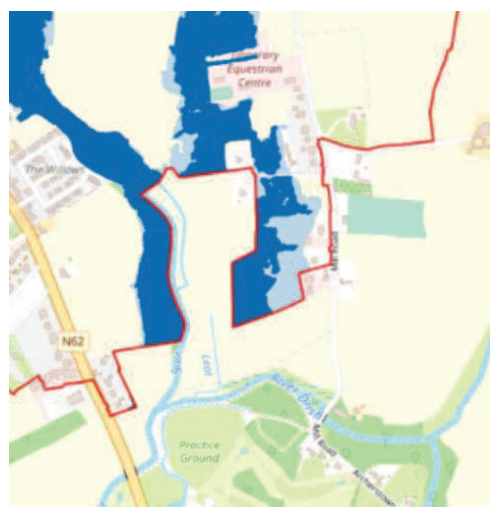


National CFRAM PDF Map, showing defended area

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 1% and 0.1% AEP extents



SFRA, Flood Zones A and B

Justification Test

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

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 Policy 8.7 and Objective 8D to support the proposed flood relief scheme in Thurles. 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

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 eight regeneration sites, consolidation site at Stradavoher or the 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 ([REDACTED]) in advance of the completion of the Draft Thurles Local Area Plan 2024-2030.

Yours sincerely,

[REDACTED]

pp Conor Galvin
Flood Risk Management – Climate Adaptation and Strategic Assessments