



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

18/12/2023

RE: Material Alterations to the 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 Material Alterations to the Draft Clonmel Local Area Plan for the period 2024 – 2030.

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

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

Flood Zones

The OPW welcomes the updated mapping which ignores the presence of flood defences and that the 1% AEP NIFM extents that were omitted have been considered in establishing the Flood Zone Mapping.

Updates to SFRA Table 4 Justification Tests

A Justification Test has been supplied for a *New Residential* zoning at the periphery of the Plan Area which proposes accommodation for travellers. The site is located fully within Flood Zone B and the Test has concluded that the zoning passes the Test. Residential development is considered highly vulnerable type development and is not appropriate in Flood Zone B. As the zoning is located at the periphery of the Plan Area a Justification Test would not be appropriate as it cannot satisfy all the parts of Criteria 2 of the Test. The Justification Test applies only to the urban centre (i.e., the core area of a city, town or village which acts as a centre for a broad range of employment, retail, community, residential and transport functions), and would not be applicable to the periphery of urban areas.

Consideration of Climate Change Impacts

As previously stated in the OPW submission on the Draft Plan *“There are no National CFRAM future scenario mapping available for Clonmel town, as these were not an output of the Clonmel Scheme”*. Tipperary County Council should note that areas not currently shown



at risk of flooding could potentially be at risk in the future and climate change should be a consideration of areas at the transition of Flood Zones and just outside the Flood Zones.

The OPW had previously commented that *“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 available for the National Indicative Fluvial Mapping Programme”.* This comment has not been addressed in the proposed Material Alterations. Tipperary County Council should note OPW previously commented for areas where there are no future scenario mapping available that *“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””.*

Material Alteration No 45

The proposed material alteration proposes a new policy which includes the *“design and construction of a walkway over the flood berm”*. Tipperary County Council should liaise with the OPW in relation to any proposals for development in the vicinity or which could affect the flood defences in Clonmel.

Material Alteration 55

Objective 3F and Objective 6I refers to a pedestrian and cycle bridge, and a river crossing respectively. It should be noted that there are restrictions on the construction, replacement or alteration of bridges and culverts over any watercourse, and that appropriate consent from the Commissioners is required under Section 50 of the Arterial Drainage Act 1945.

If further information is required, please do not hesitate to contact the OPW (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