



Planning Department,
Civic Offices,
Limerick Road,
Nenagh,
Co. Tipperary,
E45 A099

03/12/2024

RE: Draft Carrick-on-Suir Local Area Plan 2025 - 2031

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Carrick on Suir Local Area Plan for the period 2025 – 2031.

This submission is made specifically concerning flood risk management. Further submissions on the Draft Local Area 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 as set out in Policy 8.4
- Policy 8.3 and Objective 8C in relation to integrating SuDS and nature-based solutions into all development proposals

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

Mapping Datasets

Section 4.2 of the SFRA contains discussion on primary sources of flood risk information used to inform the SFRA. Table 4.1 references PFRA mapping, noting that it has not been used for Flood Zone Mapping. It is stated in section 4.2.1 of the SFRA that “*Recent guidance from the OPW on the PFRA flood mapping indicates that the dataset is considered superseded by more recent data sources and as such should no longer be used...The original maps as prepared by the OPW are available in Appendix E. PFRA indicative flood mapping indicates that minor areas of land within and surrounding the plan area may be affected by pluvial flooding*”. While it is correct that indicative flood mapping datasets such as PFRA fluvial, groundwater, and ICPSS have been superseded, PFRA pluvial mapping has not been superseded. It is not intended to update this dataset, as it is not appropriate to map flooding from pluvial sources through a national scale assessment, and pluvial datasets are more robust if produced at the community / local scale.

Consideration of Climate Change

The OPW welcomes the discussion on climate change adaptation in section 3.8 of the SFRA, in particular the discussion on:



- Adopting a cautionary approach to zoning land in transitional areas,
- Ensuring the finished levels of structures designed to protect against flooding are sufficient to cope with the effects of climate change,
- Ensuring development and flood protection structures area capable of adaptation to the effects of climate change
- The requirement for SSFRA in any area shown as at risk in Mid-Range Future Scenario extent data as set out in policy 8.4

The minimum design level requirements for fluvial flooding set out in Table 6.4 of the SFRA are welcomed, it might be beneficial if this were supported by a policy objective, (e.g. if Policy 8.4 part (d) made specific reference to this table).

It is stated in sections 3.8, 6.6.1 and 7.2 of the SFRA that “*The OPW is currently transitioning to regional based climate models that reflect the likely varied impacts throughout the island of Ireland. This is likely to be implemented during the lifetime of the county development plan*”. The OPW are not in the process of transitioning to regional based climate models, and the guidance in the 2019 Flood Risk Management Climate Change Sectoral Adaptation Plan is still applicable.

Flood Risk Assessments

The OPW welcomes the requirement as set out in section 6.2 of the SFRA that “*In order to ensure that flood risk is considered at an early stage to protect future development and increase flood resilience and sustainability, when assessing development proposals under the development management process, all development is subject to Stage 1 Flood Risk Identification / flood risk screening as a minimum to establish the need or otherwise for further flood risk assessment. Where a source and pathway for flood risk is identified then further assessment in the form of a Stage 2 FRA (or dependent on the nature of the flood source and pathway, Stage 3 FRA) will be required.*” Tipperary County Council might consider supporting this requirement via a policy objective.

Sustainable Drainage Systems (SuDS)

The Guidelines recommend that the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites.

The Guidelines also recommend that the SFRA identifies where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on individual site by site solutions.

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.

Justification Tests



The OPW welcomes the provision of plan making justification tests in the draft plan. It has not however been demonstrated how each sub criterion of part 2 of the Plan Making Justification Test has been satisfied.

Each criterion, including sub-criteria, of the Plan Making Justification Test must be satisfied for an exception to the sequential approach to be considered justified. If any criteria have not been satisfied, the justification test has not been passed.

Examples of this include the following:

- Existing Residential zoned lands, described as fulfilling “*all required sub criteria*”, located on the peripheral side of Employment zoned lands which had been described as not having satisfied part 2 of the justification test,
- Peripherally located Community Services & Infrastructure zoned lands, described as having satisfied all sub criteria, as “*the subject lands are already developed as a Wastewater Treatment Plant which serves as an essential service*”
- A justification test included for “*Existing Residential at multiple locations within the plan area*” described as fulfilling all required sub criteria

In certain cases where lands are already developed, it may be appropriate to retain a zoning to reflect existing usage, even though not all criteria of the Justification Test have been satisfied. In such cases, it should be noted that the Justification Test has not been satisfied, and that further inappropriate development in Flood Zones A or B will be limited via the note on the Land Use Zoning Objectives and Matrix, and Policy 8.4.

Where undeveloped lands on which flood risk has been identified have not satisfied all criteria of the test, the sequential approach as set out in the Guidelines should be followed and zoning of such lands for inappropriate usage should be avoided, or a usage appropriate to the level of flood risk should be substituted.

Part 3 of the Plan Making Justification Test as set out in the Guidelines is that “*A flood risk assessment to an appropriate level of detail has been carried out as part of the Strategic Environmental Assessment as part of the development plan preparation process, which demonstrates that flood risk to the development can be adequately managed, and the use or development of the lands will not cause unacceptable adverse impacts elsewhere*”. This is a requirement that in order to satisfy the Justification Test, it must be demonstrated that it is feasible to develop the lands in question safely, that flood risk can be adequately managed and the use or development of the lands will not cause unacceptable impacts elsewhere. Tipperary County Council should specify the structural or non-structural measures as prerequisites to development and provide information on the residual risks that would remain and how they might be managed. Any requirements, mitigations or limitations required to ensure the lands can be safely developed should be included and transposed into the draft plan as policy objectives, and this should **not** be passed on to development management.

An area of land zoned Community Services and Infrastructure which can allow highly vulnerable development, located on the southern side of Dillon Bridge, has not been assessed against the criteria of the Plan Making Justification Test. Highly Vulnerable Development is not appropriate in Flood Zone A or B unless it can be demonstrated that all criteria and sub criteria have been satisfied.



If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Draft Carrick-on-Suir Local Area Plan 2025-2031.

Yours sincerely,

A handwritten signature in black ink, which appears to be 'Conor Galvin', is written over a horizontal line. The signature is fluid and cursive.

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments