



Forward Planning Unit,
Development Plan Review,
Louth County Council,
Town Hall,
Crowe Street,
Dundalk,
Co. Louth
A91 WY93

23/12/2020

RE: Draft Louth County Development Plan 2021- 2027

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Louth County Development Plan 2021- 2027.

The OPW welcomes the acknowledgement of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines', and the proposed measures set out in the Flood Risk Management Plans (FRMPs) based on the work undertaken for the CFRAM Programme, and the preparation of a Strategic Flood Risk assessment (SFRA). In particular, the OPW welcomes objectives IU24 – 30, directly relating the implementation of the aforementioned guidelines.

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

Sequential Approach

The Guidelines highlight the need for a Sequential Approach to managing flood risk, using mapped flood zones alongside considerations of the vulnerability of different types of development to give priority to development in zones of low flood probability. Only if there are no reasonable sites available in zones of low flood probability should consideration be given to development in higher flood probability zones. It would appear that land use zoning within Flood Zones that would be considered inappropriate or require application of the Justification Test, in accordance with Table 3.2 of the Guidelines, has been proposed in a number of settlements, as detailed in the Comments on Specific Settlements section below.

No comment can be provided by the OPW on the application of the sequential approach to planning in relation to flood risk management for settlements with no planning zones.

It is recommended that the Sequential Approach be applied to all stages of the planning and development management process.



Flood Maps

The *Draft Zoning and Flood Zones Map* flood extents are unclear in areas with small or narrow extents.

The flood extents shown on *Composite Maps* do not match the *Draft Zoning and Flood Zones Map* extents. In the below example from Carlingford, Flood Zone B has been omitted in the Architectural Conservation Area.



Carlingford – Draft Zoning and Flood Zones Map

Carlingford – Draft Composite Map

Justification Test

The Justification Test as set out in the Guidelines, and as referenced in Section 4.3 of the SFRA does not appear to have been applied or reported in the preparation of the Plan. Please note that 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.

The settlement zoning maps show proposed land use zoning that is classified as *Highly vulnerable development* in the Guidelines, within Flood Zones A & B. This is detailed further in the Comments on Specific Settlements section below.

Proposed Flood Defence Schemes

The OPW welcomes policy objective IU27 for Louth County Council to implement the Flood Risk Management Plan (FRMPs) relevant to its administrative area.

The OPW recommend that Louth County Council consider specific policy objectives that have full regard to the development of flood relief schemes in Baltray, Carlingford, Drogheda, Dundalk & Blackrock South and Ardee. This is to ensure that zoning or development proposals support and do not impede or prevent the progression of these measures.

Preliminary Flood Risk Assessment (PFRA)

The PFRA was a national screening exercise, to scope the CFRAM Programme and identify areas of potentially significant flood risk. It is important to note that the PFRA was not a detailed assessment of flood risk. It was rather a broad assessment, based on available and readily derivable information to identify areas that may require further assessment. As set



out in Circular PL 2/2014 “*the (PFRA) maps provide only an indication of areas that may be prone to flooding. They are not necessarily locally accurate and should not be used as the sole basis for defining Flood Zones, or for making decisions on planning applications*”. Where more accurate predictive flood mapping is not available, they may indicate where flooding may be an issue.

Consideration of Climate Change Impacts

The OPW welcomes the inclusion of policy objective IU30, to ensure flood risk management activity is examined to determine actions required to embed and provide for effective climate change adaptation.

The potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. In line with the Guidelines, while Flood Zones are defined on the basis of current flood risk, planning authorities need to consider such impacts in the preparation of plans, such as by avoiding development in areas potentially prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels and setting specific development management objectives. The flood maps prepared under the CFRAM Programme include maps for two potential future scenarios taking account of different degrees of climate impact.

The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, are available to view on the OPW portal, www.floodinfo.ie, and may be obtained in GIS format from the OPW Data Management Section via email (flood_data@opw.ie).

Examples of land use zonings in locations that are potentially at risk in future scenarios are detailed in the Specific Settlements section below.

Sustainable Drainage Systems (SuDS) and Green Infrastructure

The OPW welcomes the inclusion of Appendix 8, Green Infrastructure Strategy, and the inclusion of policy objectives NBG44, which support the creation of Riparian Zones along watercourses, and also IU18 - 22 which require the incorporation of Sustainable Urban Drainage Systems in any new developments.

The Guidelines 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.

Arterial Drainage Scheme

No commentary has been provided on the Boyne and Neagh Bann Arterial Drainage Schemes. The OPW recommend that consideration be given in zoning land for development to ensure that access requirements are preserved for the maintenance of Arterial Drainage Schemes and Drainage Districts. Applications for development on land identified as benefiting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.



Historic Floods

There are flood event records for Louth that are currently not available on the OPW flood portal; www.floodinfo.ie. These flood events have not been included in the National Flood Hazard Mapping Reports as part of the SFRA.

Specific Settlements

Annagassan

Highly vulnerable *New Residential* is proposed in Flood Zone A & B.

Ardee

Highly vulnerable *New Residential*, and Less Vulnerable *Strategic Reserve* and *General Employment* developments are proposed in Flood Zone A.

The proposed *New Residential*, *Strategic Reserve* and *General Employment* sites overlaps with the potential future scenarios flood extent maps prepared under the National CFRAM Programme, which take account of climate change impacts.

Baltray

Highly vulnerable *New Residential* is proposed in Flood Zone A.

Carlingford

Several areas located in Flood Zones A & B have zonings which allow Highly vulnerable and Less vulnerable usage, such as *New Residential* either side of the Greenore road and in the Oyster Bay Court area.

Castlebellingham/Kilsaran

Several areas located in Flood Zones A & B have zonings which allow Highly vulnerable and Less vulnerable usage such as *New Residential* on the Dundalk Road, and general employment off the R166.

Clogherhead

Highly vulnerable *New Residential* is proposed in Flood Zone B.

ICPSS coastal extents are omitted at the harbour site zoned for *General Employment*.

Collon

Less vulnerable *Strategic Reserve* and *General Employment* sites are proposed in Flood Zone A.



Drogheda

Flood Zone B has been omitted from the Drogheda *Draft Zoning and Flood Zones Map*. As seen in the below excerpt from the *Draft Zoning and Flood Zone Map* in the plan compared to the flood maps on www.floodinfo.ie. The zonings shown in *Draft Zoning and Flood Zones Map* and the map for Drogheda in the SFRA do not correspond.



Drogheda Draft Flood Zone and Land Use Map



Drogheda – Present Day Extents on www.floodinfo.ie

A number of areas located Flood Zones A & B in Drogheda have zonings which allow Highly vulnerable and less vulnerable usage. Examples of which are as follows:

- Area for port expansion, on both sides of the Boyne located within Flood Zone A has been zoned as *Regeneration*, which allows Highly vulnerable development, and *General Employment*.
- An area between Liscorrie and Rosehall zoned as Highly vulnerable *New Residential* located within Flood Zone A.
- Area on the north bank of the Boyne, adjacent to the bridge of peace zoned as *Regeneration*, located within Flood Zone A.
- Area beside Upper Mell zoned as *General Employment* located in Flood Zone A.

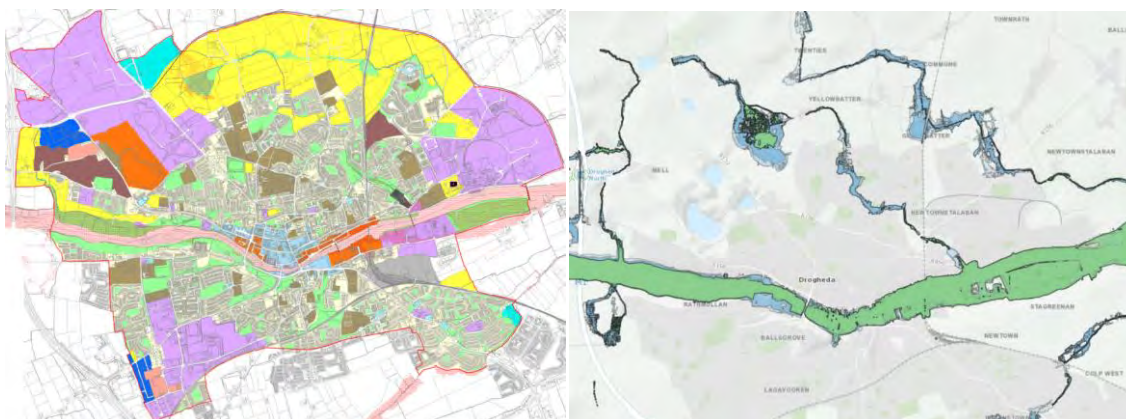
The Mell area, zoned as *New Residential* is shown as inundated under the fluvial high end future scenario.



Drogheda Draft Flood Zone and Land Use Map



Drogheda – High End Future Scenario Extents on www.floodinfo.ie



Draft Flood Zone and Land Use Map and Future Scenario (MRFS and HEFS) Flood Extents for Drogheda

The SFRA notes that the Drogheda Flood Relief Scheme “*will also enable further sustainable development of at risk undeveloped land*”. Flood Relief Schemes are designed to mitigate the risk of flooding to existing communities and properties.

When determining flood zones the presence of flood protection structures should be ignored, as flood defences can only reduce the risk of flooding and cannot eliminate it. Areas protected by a flood relief scheme still carry a residual risk of flooding from overtopping or breach of defences. The likelihood and extent of this residual risk needs to be considered in determining the appropriateness of particular land uses and development.

Dromiskin

Highly vulnerable *New Residential* and Less vulnerable *Strategic Reserve* are proposed in Flood Zone B.

Dundalk

A number of areas located in Flood Zones A & B in Dundalk have zonings which allow Highly vulnerable and Less vulnerable developments. Several examples are as follows:

- Areas zoned as Highly Vulnerable *New Residential* to the north of Saltown in Flood Zone A
- Area zoned as Highly Vulnerable *New Residential* adjacent to Mount Avenue, in Flood Zone A
- Area zoned as Highly Vulnerable *New Residential* adjacent to Coulter Place in Flood Zone A.
- Areas zoned as Highly Vulnerable *New Residential* along the Newry Road Flood Zone B
- Area adjacent to Newry Road north of the river Castletown zoned as general employment is located in Flood Zone A.



The zonings shown in *Draft Zoning and Flood Zones Map* and the map for Dundalk in the SFRA do not correspond.

Knockbridge

Highly vulnerable *New Residential* and *Community Facilities* are proposed in Flood Zone A.

Louth Village

Less vulnerable *Strategic Reserve* is proposed in Flood Zone B.

Omeath

Less vulnerable *Strategic Reserve* is proposed in Flood Zone A.

Tallanstown

Highly vulnerable *New Residential* and an undeveloped *Town or Village Centre* site shown is proposed in Flood Zone A

Dunleer

Undeveloped *Community Facilities* and *Town or Village* sites proposed in Flood Zone A and Flood Zone B respectively.

If further information or input is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Louth County Development Plan 2021- 2027.