



**Planning Department,
Leitrim County Council,
Áras an Chonate,
St. George's Terrace,
Carrick-on-Shannon,
Co. Leitrim,
N41 PF67**

22/11/2022

RE: Material Alterations to the Leitrim County Development Plan 2023-2029

Dear Sir/Madam,

The Office of Public Works (OPW), as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Material Alterations to the Leitrim County Development Plan 2023-2029. This submission is made specifically regarding flood risk and the application of the Guidelines on the Planning System and Flood Risk Management (DECLG/OPW, 2009), hereafter referred to as the 'Guidelines'. Further submissions may be made by the OPW with regarding the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the following Material Alterations which address comments made in the OPW submission on the Draft Plan:

- Material Alteration MA 63 which updates Policy FRM POL 11 to require that development on lands within Mid Range Future Scenario flood extents be subject to SSFRA, and that such assessments consider climate change impacts and adaptation measures
- Material Alterations number MA 105, 107, 110, 116, 120-3 & 128 which add objectives BNE 33, DMR 31, DSO 34, MHL 23, DD 8, LM 9, FH 5 and KN 6, restricting development in tourism zoned lands in Flood Zones A and B to Water Compatible or less vulnerable development, appropriate to the relevant flood zone

Justification Tests

The OPW commentary on the draft plan noted in relation to the approach taken to Plan Making Justification Tests that *“Each criterion in part 2 of the Justification Test must be addressed and satisfied. A zoning can only pass the Justification Test when all criteria have been satisfied. While Table 8 of the SFRA states that all criteria have been met it is not explicit from the text provided how each of the criteria have been met. It would be beneficial if each criterion of part 2 of the Justification Test were addressed individually.”* This comment has not been addressed at Material Alteration stage.

Climate Change

While the OPW welcomes the inclusion at Material Alteration stage of a reference to the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019, this is referenced alongside the superseded 2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management. The OPW recommends that reference to 2009 guidance be removed from the plan.

With regards to potential future scenarios, the OPW recommends referencing the Flood Risk Management Climate Change Sectoral Adaptation Plan 2019 prepared under the National Adaptation Framework.

Sustainable Urban Drainage Systems

The OPW commentary on the draft plan noted the recommendation in the Guidelines that: “*the SFRA provide guidance on the likely applicability of different SuDS techniques for managing surface water run-off at key development sites, and also 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*”. While the additional text regarding SuDS provided at Material Alteration stage is welcomed, this guidance is intended to promote the consideration of the applicability of specific SuDS techniques to specific opportunity sites identified in the plan, and to identify areas in settlements where integrated and area based provision of SuDS might be appropriate.


Comments on Specific Settlements

Drumshanbo

The OPW commentary on the draft plan noted that, notwithstanding the use of a Constrained Land Uses designation for developed lands, there were undeveloped lands zoned *Social & Community* in Drumshanbo. The Chief Executive Report response to observation stated that an additional objective would be added for Drumshanbo. The only additional objective added for Drumshanbo however, DSO 20, refers to *Tourism Related Development*, and does not reference *Social & Community* zoned lands.

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 Draft Leitrim County Development Plan 2023-2029.

Yours sincerely,



PP Conor Galvin

Flood Relief and Risk Management – Climate Adaption & Strategic Assessments

