

# Draft Leitrim County Development Plan 2023-2029

For Aughry & Dromod Beg, Dromod FLOOD PLAIN ZONING

---

The EU Floods Directive has produced detailed and easily available information for good flood risk land management. It is co-ordinated with the Water Framework directive and requires the use of the Precautionary Principle. It is a legal duty of Leitrim County Council (LCC) and its officer(s) to apply this at local level, to the development plan of the Shannon-side Village of Dromod (long ridge).

In this submission I refer to specific folios of lands within the townlands of Aughry and Dromod Beg, Dromod, Co. Leitrim as 'the area'. They are LM15140 and LM4647F. This area referred to is a very high flood risk area (high Likelihood of flooding x Consequences of flooding – risk our property would become uninhabitable). Our home/property at risk is downstream and downhill at LM14471F.

In the early 2000's permission was given for the development of Bofin Avenue (Ascaill Bo Finne) on a non-zoned flood plain/wetland adjacent to the area. These lands were centuries old natural wetlands/floodplains of the adjacent River Shannon. This development with its significant infilling caused a historic alteration of the natural flood plain of the area. Annual flood waters have since been pushed further North West up into the adjoining lands within the Aughry valley, along the ridge of Dromod and onto lands never flooded in the known centuries beforehand. This has resulted in external flooding to our property to floor level. Any development of the area will cause internal flooding and this submission calls for the area to be zoned Floodplain with no development allowed, constrained or otherwise.

Given the topography of the local lands there is also contribution by LM15119. This is outside the current plan area but due diligence also needs to be given to the restriction of development in these adjoining lands as ground and surface water flows at a gradient/ridgelines towards us. There is combined significant overland run off and groundwater flooding through these local alluvial soils.

Furthermore, please note my necessary objection to the proposed Dromod flood 'relief scheme'. The Bofin Avenue estate was taken in charge by LCC. A multi million-euro Flood 'relief' scheme or wall is proposed to protect that area. This draft development plan states that 'Leitrim County Council will continue to work with the OPW to progress a suitable scheme in Dromod over the life of this Draft Plan.' This proposed development would divert and push even greater volumes of Shannon floodwater further up the Aughry valley and over our land. It would result in internal flooding of our home and a total write off our asset.

It can also be noted that no action was taken by LCC to enforce the removal of illegal recent significant further infill of this area by a land owner after its deforestation.

The proposed draft plan does attempt to address flood risk but by zoning land at risk and giving them it 'Constrained land use'. However, as mentioned above any development of the lands will alter the ground and surface water flows and volumes resulting in internal flooding of our home. No development whatsoever, constrained or otherwise is appropriate in these lands.

PLANNING SECTION  
LEITRIM COUNTY COUNCIL

-5 APR 2022

REF. P. \_\_\_\_\_

A contained land use zoning is not within guidelines and legal requirements. It allows development applications that will in any nature increase the risk of flooding to us. In my view it is a legal obligation of LCC to zone this known high risk flood area as flood plain as outlined below. Please understand the risk we face and that I want to avoid being forced to object / issue legal challenges.

The page 123 footnote of the written Statement is as follows:

*Note: Flood hazard and flood risk information is an emerging dataset of information. The flood risk mapping used by the Council may be altered in light of future data and analysis. Therefore, all landowners and developers are advised that Leitrim County Council accept no responsibility for losses or damages arising due to assessments of vulnerability to flooding of lands, uses and developments. Owners, users and developers are advised to take all reasonable measures to assess the vulnerability to flooding in a particular area, prior to submitting a planning application.*

This will not absolve LCC of their legal obligations to Zone the lands as Flood plain (with no development) given the extent of information now readily available and further highlighted in this submission.

Relevant guidelines states that :

*Flood zones are geographical areas within which the likelihood of flooding is in a particular range and they are a key tool in flood risk management within the planning process as well as in flood warning and emergency planning. There are three types or levels of flood zones defined for the purposes of these Guidelines: Flood Zone A – where the probability of flooding from rivers and the sea is highest (greater than 1% or 1 in 100 for river flooding or 0.5% or 1 in 200 for coastal flooding); Flood Zone B – where the probability of flooding from rivers and the sea is moderate (between 0.1% or 1 in 1000 and 1% or 1 in 100 for river flooding and between 0.1% or 1 in 1000 year and 0.5% or 1 in 200 for coastal flooding); and Flood Zone C – where the probability of flooding from rivers and the sea is low (less than 0.1% or 1 in 1000 for both river and coastal flooding). Flood Zone C covers all areas of the plan which are not in zones A or B.*

**The area in question is within a known High Risk Flood Zone A area and is shown in the Figures below:**

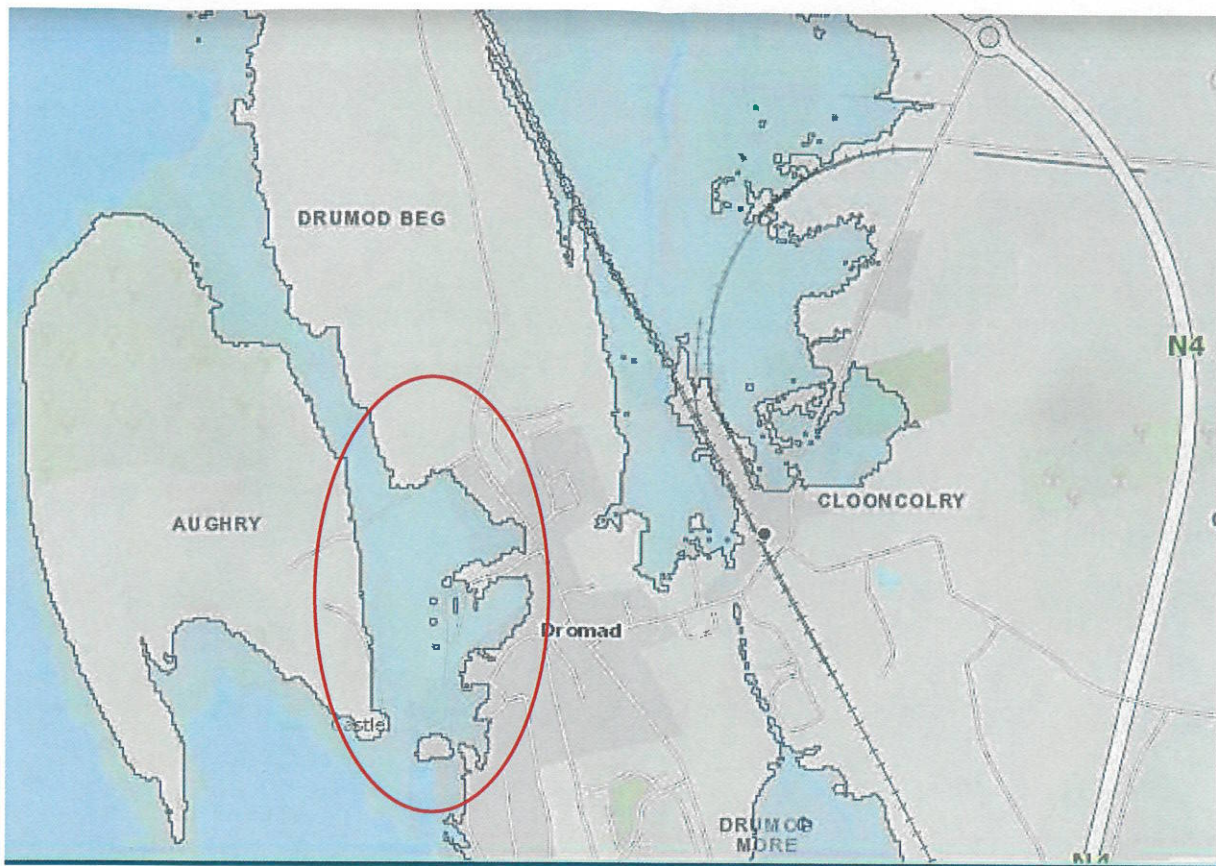


Figure 1 : BLUE AREA = LOW PROBABILITY

Red Circled – contains ‘the area’ I refer to and live in.

Above: Source <https://www.floodinfo.ie/map/floodmaps/> 4/4/2022

*This layer shows the modelled extent of land that might be flooded by rivers in a very extreme flood event. River flooding is referred to as Fluvial flooding in the Maps and Plans. Low Probability flood events have an indicative 1-in-a-1000 chance of occurring or being exceeded in any given year. This is also referred to as an Annual Exceedance Probability (AEP) of 0.1%. The Mid-Range Future Scenario extents were generated taking in the potential effects of climate change using an increase in rainfall of 20% and sea level rise of 500mm (20 inches)*



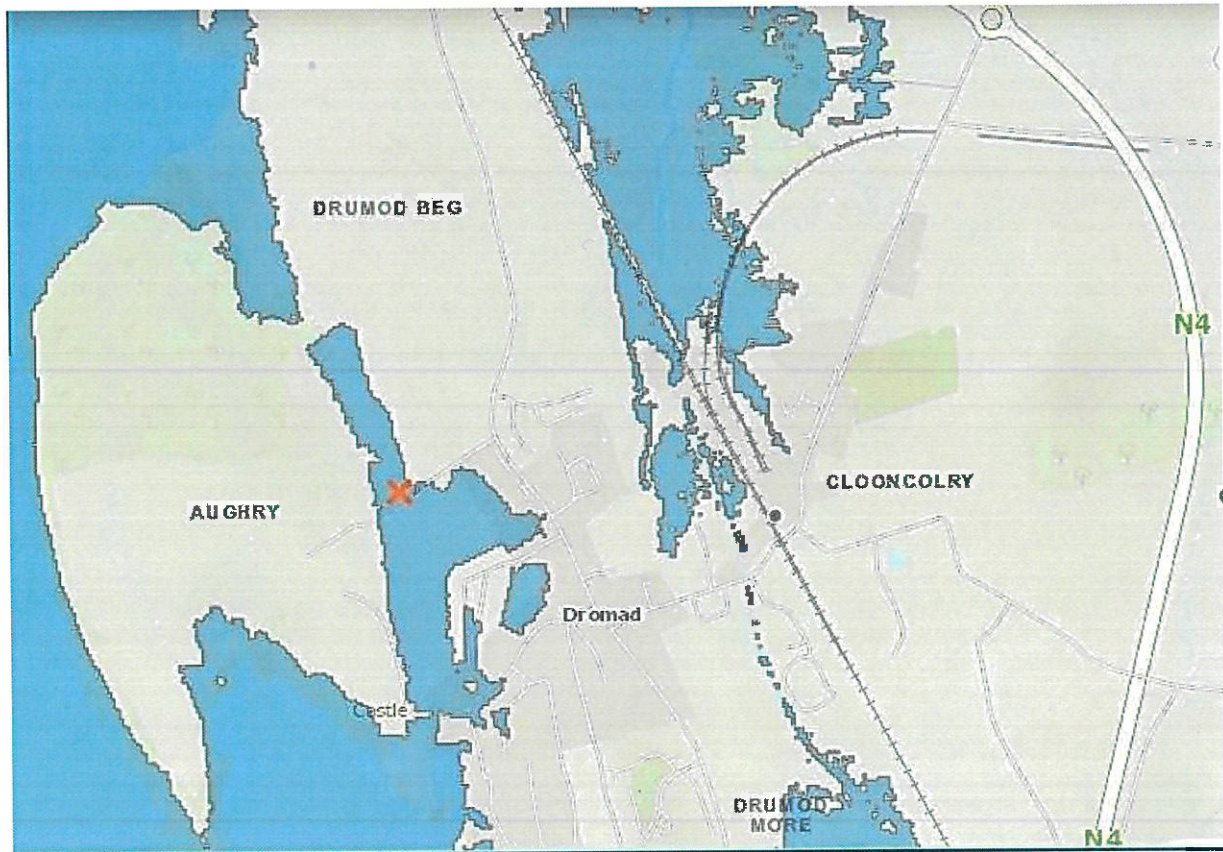


Figure 2 - Above: **HIGH PROBABILITY** –\*\*\* Red X is our home \*\*

#### Layer Information

*This layer shows the modelled extent of land that might be flooded by rivers in a moderate flood event. River flooding is referred to as Fluvial flooding in the Maps and Plans. High Probability flood events have approximately a 1-in-a-10 chance of occurring or being exceeded in any given year. This is also referred to as an Annual Exceedance Probability (AEP) of 10%. The Present Day scenario is referred to as the Current Scenario in the Maps and Plans. The Present Day maps were generated using methodologies based on historic flood data, without taking account of potential changes due to climate change. The potential effects of climate change have been separately modelled and reported on.*

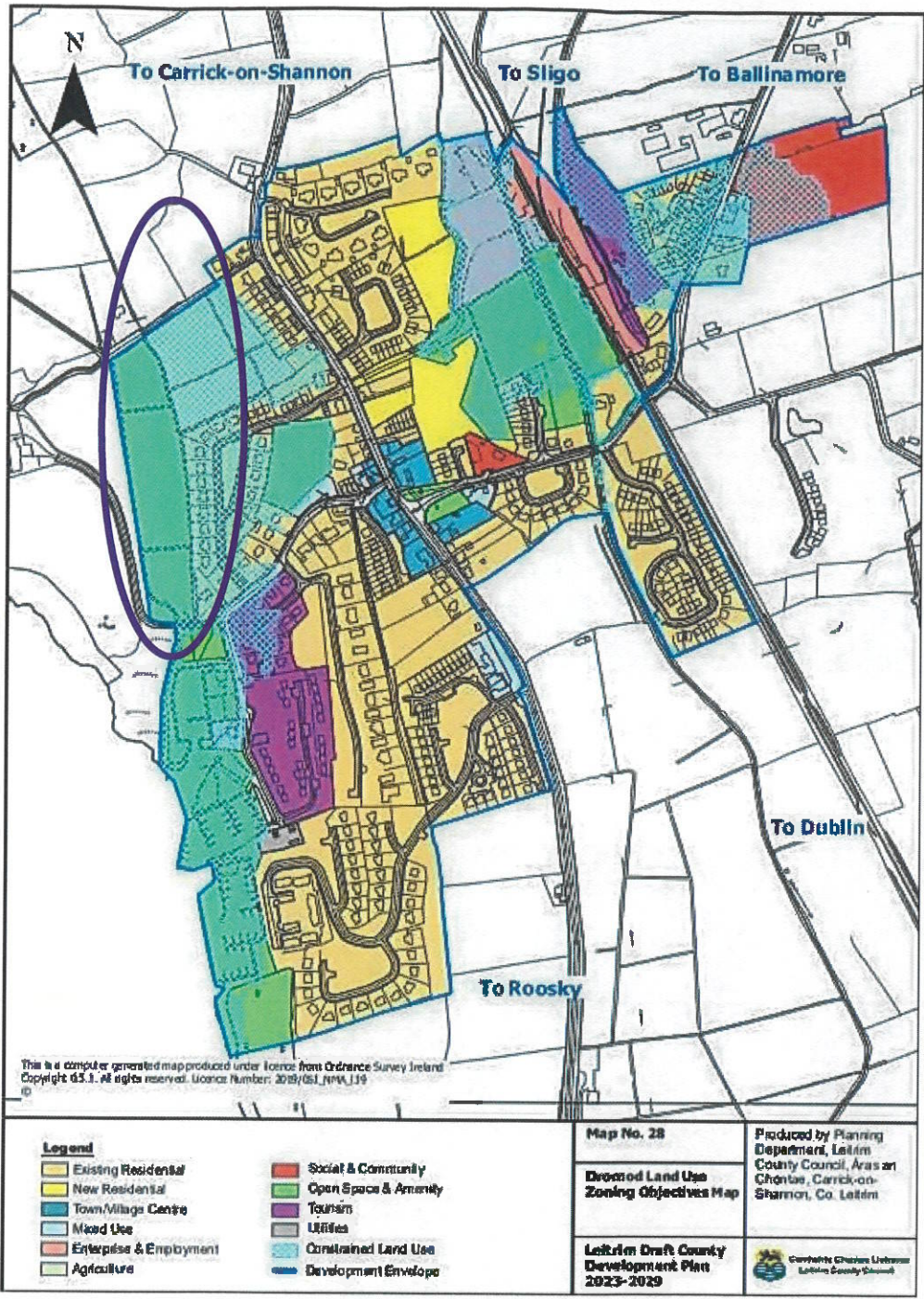


Figure 3 – proposed zoning of Dromod in the Draft development plan  
 'The Area' of the Aughry valley for Flood Plain Zoning is in Purple circle (roughly)





Above Figure 4 - Development plan Map CFRAM map of Plan boundary and Flooding



Above- Figure 5

Flood Zone – A in Darker blue – contains ‘the area’ of the Aughry Valley for Flood zoning – no development

The Dromod Development Objective DD7 (says as follows)

*Ensure applications for development on lands identified as flood risk areas, shall be subject to a Specific Flood Risk Assessment and Justification Test, in accordance with the Planning System and Flood Risk Management – Guidelines for Planning Authorities (2009), or any superseding guidelines and circulars.'*

Part 9.2.4 Flooding (says as follows)

*'The SFRA has identified significant lands within the village boundary with a high probability of being liable to flooding. The affected lands are located along the harbour adjoining Lough Bofin (part of Shannon system) and the Eslin River which also flows through the village. These lands have been designated as Open Space and Amenity or Agriculture with Constrained Land Use where they coincide with greenfield lands. The areas of existing development which are considered liable to flooding, based on the SFRA, have been similarly identified with a constrained land use zoning objective overlain on the existing use.'*

The above is contrary to 1.4.4.2 Principles of Flood Risk Management: to

- Avoid development that will be at risk of flooding or that will increase the flooding risk elsewhere,
- that 'Development in areas that have the highest flood risk should be avoided'

It is noted therein that

- ***Planning authorities will ensure that development is not permitted in areas of flood risk, particularly floodplain***

Guidelines for Planning Authorities refer to:

***'Floodplains- A major function performed by the floodplain and wetlands is to hold excess water until it can be released slowly back into a river system or seep into the ground as a storm subsides. Floodplains have, therefore, a valuable function both in attenuating or storing floodwater and through their ability to convey floodwater in a relatively controlled and safe way. Areas of floodplain and wetlands should, therefore, be recognised and preserved to the extent possible as natural defences against flood risk. It is important to identify and, where possible, safeguard areas of floodplain against development in both urban and rural areas. By retaining open spaces for storage and conveyance of floodwater, flood risk to both upstream and downstream areas can be more effectively managed without reliance on flood defences. This is an important element of the now internationally accepted philosophy of "leaving space for water".***

*Land required for current and future flood management, e.g. conveyance and storage of flood water and flood protection schemes, should be proactively identified on development plan and LAP maps and safeguarded from development.*

***A precautionary approach should be applied, where necessary, to reflect uncertainties in flooding datasets and risk assessment techniques and the ability to predict the future climate and performance of existing flood defences. Development should be designed with careful consideration to possible future changes in flood risk***

Dromod Flood relief scheme:

This scheme is not suitable and reinforces the need for Flood plain Zoning. The proposed Dromod flood relief scheme will render our house uninhabitable for reasons outlined above. I note Guidelines for Planning Authorities refer to:

*'The provision of flood protection measures in appropriate locations, such as in or adjacent to town centres, can significantly reduce flood risk. However, the presence of flood protection structures should be ignored in determining flood zones. This is because areas protected by flood defences still carry a residual risk of flooding from overtopping or breach of defences and the fact that there may be no guarantee that the defences will be maintained in perpetuity. The likelihood and extent of this residual risk needs to be considered, together with the potential impact on proposed uses, at both development plan and development management stages.'*

The SFRA refers to

*'Dromod Shannon Upper and Lower River Basin (UOM25- 26) Proposed Measure: Progress the development of a Flood Relief Scheme for Dromod Outline: Progress the project-level development and assessment of a Flood Relief Scheme for Dromod, including environmental assessment as necessary and further public consultation, for refinement and preparation for planning / exhibition and, if and as appropriate, implementation. The proposed measure for Dromod that may be implemented after project-level assessment and planning or Exhibition and confirmation might include; • Construction of 368m of new flood defence walls, 263m of new embankments, and a 13m flood gate to defend properties. • Flood forecasting. • Promotion of Individual and Community Resilience'*



## Summary

- 1) Zoning the area referred to as Flood plain (with no development potential or constrained use allowed) will bring back the Wetlands and mitigate the flood risk. It is sustainable development. It is a legal requirement.
- 2) The current policy of Zoning High Risk Flood Zone A land and then allocating allowing a constrained use gives it development potential subject to a flood risk assessment. However, any alteration of use, any development will result in increased volumes and flow and thus internal flooding of our home. This is clearly known and far beyond any reasonable doubt.
- 3) Flood Plain Zoning (not allowing any development) is in line with the principles of the planning guidance. Constrained use is unequivocally against the precautionary principle which must be used as per EU and national Law.
- 4) Zoning in flood risk management must use best information available and today's known significant climate change risk. The IPCC reports on Mitigation of Climate Change refers to flood plains in land management in delivering flood mitigation and in adaptation outcomes in the restoration of wetlands.
- 5) Zoning flood plain will avoid the need and the cost to the taxpayer of the proposed Flood Relief walls
- 6) The area referred to in this submission in Flood Zone A is also highly sensitive to flooding by rainstorms and flash flooding as well as River flooding. The uplift in the CFRAM models is not sufficient for future climate change as outlined in various IPCC reports and again and beyond any reasonable doubt.
- 7) Lands outlined above which contribute to the surface or groundwater flows of 'the area' are unsuitable for development due to unacceptable flood risks to us, the occupants of and adjoining property.

Thank you for your time and consideration.

Please keep my personal data as private and confidential as you can.

Yours Sincerely,

Odran Duignan



