



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

21/04/2022

RE: Draft Leitrim County Development Plan 2023-2029

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft 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 on the draft Plan may be made by the OPW with regarding 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). The OPW welcomes the inclusion of flood risk management policies FRM POL 1 – FRM POL 16 and objectives FRM OBJ 1 – FRM ONJ 2.

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

Flood Zones

The OPW suggest that section 1.4.4.4 Flood Zones of the SFRA notes that the presence of flood protection structures are ignored when determining flood zones

The inclusion of Land Use Zoning / Flood Intersections mapping is informative and helpful. These maps could be improved by indicating to which Flood Zone the intersections relate i.e. Flood Zone A or Flood Zone B.

Constrained Land Uses and Justification Tests

The OPW notes the use of a Constrained Land Uses designation in the Draft Plan. The Draft Plan states that where:

‘such flood risk extents correspond with undeveloped lands, an appropriate land use zoning objective which would not facilitate the development of classes of development vulnerable to the effects of flooding has been identified such as ‘Open Space’ or ‘Agriculture’.



For several settlements, lands that appear to be undeveloped have been zoned for vulnerable uses as detailed in Table 1.

Table 1 Undeveloped land zoned for vulnerable usage

Settlement	Vulnerable Development
Dromod	Enterprise & Employment
Dromod	Tourism Related Development
Drumshanbo	Social and Community
Drumsna	Tourism Related Development (north of L3656)
Drumsna	Tourism Related Development (south of L3656)
Fenagh	General
Keshcarrigan	Tourism Related Development
Leitrim Village	Tourism Related Development

The OPW suggest that for these undeveloped lands, land use-zoning objectives that would not facilitate the development of classes of development vulnerable to the effects of flooding should be applied.

A zoning of Tourism Related Development may include water compatible uses. Where land within Flood Zones A or B has been zoned for Tourism Related Development an objective to restrict development to water compatible usages could be added to the respective settlement plan i.e. for Dromod, Drumsna, Keshcarrigan, and Leitrim Village.

Each criterion in the 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.

Climate Change

The Guidelines state that a precautionary approach to climate change should be applied and a cautious approach to zoning in potential transitional areas. 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.

FRM POL 11 (b) states that applications for development within Flood Zones A or B shall be subject to site specific flood risk assessments, while FRM POL 13 requires the submission of site-specific flood risk assessments for developments undertaken within Flood Zones A & B and on lands subject to the mid-range future scenario floods extents. The OPW recommend that FRM POL 11 (b) be amended to align with FRM POL 13.



Reference is made in the SFRA to '2009 OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management'. The OPW recommend that the SFRA refer to the Flood Risk Management – Climate Change Sectoral Adaptation Plan 2019 and the guidance on potential future scenarios contained therein.

Sustainable Urban Drainage Systems

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, 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.

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,

A handwritten signature in black ink, which appears to read 'Conor Galvin', is written over a solid horizontal line.

Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments