



Oifig na
nOibreacha Poiblí
Office of Public Works



Planning Department,
Roscommon County Council,
Áras an Chontae,
Roscommon
F42 VR98.

26/01/2024



RE: Draft Roscommon Town Local Area Plan 2024-2030

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Roscommon Town Local Area Plan 2024-2030.

This submission is made specifically concerning flood risk management. Further submissions on the Issues Paper 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:

Constrained Land Use Zoning

The OPW notes that a constrained land use strategy has been adopted in the development of the Local Area Plan, and as set out in section 9.4 of the draft plan, "*Uses under all zoning objectives shall be limited to water-compatible uses in Flood Zone A and less vulnerable or water compatible uses in Flood Zone B. Detailed site specific Flood Risk Assessment will be required in these areas. This limitation shall take primacy over any other provision relating to these land use zoning objectives*". This text is welcomed by the OPW. Roscommon County Council might consider strengthening this requirement by including this text in a policy objective.

Flood Relief Scheme

As set out in Section 2.2 of the SFRA, there is a flood relief scheme proposed for Roscommon Town. Roscommon County Council might consider inclusion of a specific policy objective to support the development of this scheme, and to ensure that zoning or development proposals support and do not impede or prevent the progression of the planned measures.

Drainage Districts

As set out in Section 2.2 of the SFRA, the plan area contains channels and benefitting lands associated with the Hind Drainage District. Applications for development on land identified as benefitting land may be prone to flooding, and as such site-specific flood risk assessments may be required in these areas.

Flood Zones

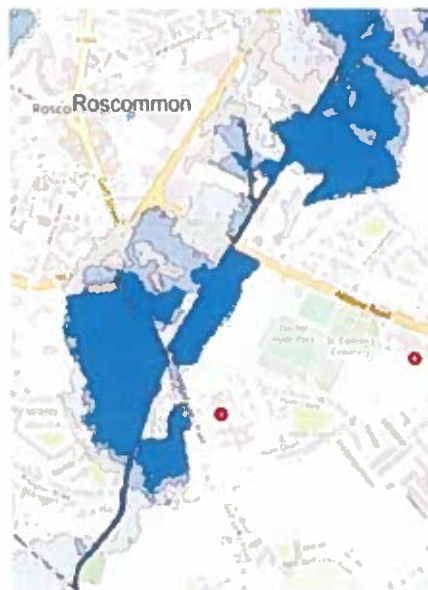


Map 2: Flood Risk shows the mapped Flood Zones A and B for the settlement. The Flood Zone mapping along the Jiggy/Hind watercourse, southeast of Circular Road and either side of Athlone Road appears to have used the CFRAM 10% Annual Exceedance Probability Mapping to define Flood Zone A. Flood Zone A should be defined as areas where the Annual Exceedance Probability is greater than 1% for fluvial flooding, and greater than 0.5% for coastal flooding.

While the constrained land use mapping has been overlaid on Land Use Zoning mapping, in order to assess the levels of risk against the vulnerability of proposed land uses it would be beneficial if Flood Zones A and B were also overlaid on the Land Use Zoning mapping.



Flood Zone Mapping from Map 2



CFRAM Extent Mapping from SFRA

Justification Test

There is an area to the east of the settlement, along the Lanesborough Road, zoned less vulnerable *Strategic Industrial/Enterprise Zone* and located in Flood Zone A for which no Justification Test has been provided. Less vulnerable development is not appropriate in Flood Zone A unless all criteria of the Plan Making Justification Test have been satisfied.

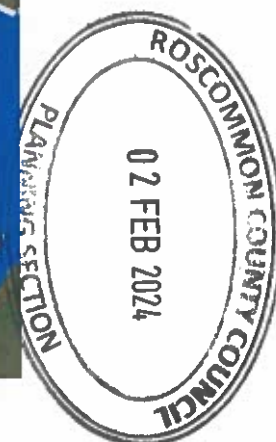




Strategic Industrial/Enterprise Zoned lands at
Lanesborough Road



Present Day Flood Zones A and B



Consideration of Climate Change Impacts

The discussion on Sensitivity to Climate Change in section 3.4 of the SFRA states that *"The CFRAMS potential future scenarios mapping and the potential impacts of climate change, including increased rainfall intensities and increased fluvial flood flows, are required to be further taken into account at lower tiers of decision making concerning individual projects"*. 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 OPW welcomes the inclusion of the National CFRAM potential future scenario mapping in the SFRA, however how these maps have been used to assist in taking a precautionary approach to climate change has not been stated. It would be useful if these maps could be overlaid with the land use zoning map to show the areas potentially at risk of flooding in the future.

Nature-based Solutions and SuDS

The OPW welcomes objective RN 58 requiring the provision of SuDS, as part of development proposals and the discussion in Section 3.5 Sustainable Drainage Systems and Surface Water Guidance and Strategy of the SFRA, which outlines the various different SuDS techniques that may be applicable in general to development sites in Roscommon Town.

Further guidance on the likely applicability of different SuDS techniques, consistent with surface water strategy development for managing surface water run-off at identified opportunity sites may be considered. Roscommon County Council might provide guidance and identify areas where integrated and area based provision of SuDS and green infrastructure are appropriate in order to avoid reliance on site by site solutions.

If further information is required, please do not hesitate to contact the OPW (floodplanning@opw.ie) in advance of the completion of the Draft Roscommon Town Local Area Plan 2024 - 2030.



Yours sincerely,

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

pp Conor Galvin

Flood Risk Management – Climate Adaptation and Strategic Assessments

