



Senior Planner,
Planning Section,
Laois County Council,
Aras an Chontae,
JFL Avenue,
Portlaoise,
Co. Laois.

RE: Issues Paper Laois County Development Plan 2021 - 2027

Dear Sir/Madam,

The Office of Public Works (OPW) welcomes the opportunity to comment on the Issues Paper in the preparation of the Laois Development Plan for the period 2021 – 2027. OPW are currently working with Laois County Council in the development of suitable measures to alleviate flooding in areas such as Mountmellick and Portarlinton. OPW look forward to developing these projects over the coming months and years.

Flood risk has not featured prominently in the Issues paper with the exception of the mandatory SFRA requirement under the Strategic Environmental Assessment. This must be remedied as part of the full County Development Plan and flooding brought forward as a key consideration. Laois County Council should ensure that it does not fall out of focus in new Development Plan as it is such an important issue and has an impact on almost all categories listed within the issues paper such as 'growth and settlement', 'Infrastructure', 'Climate Change' and 'Sustainability'.

OPW advise clear commitments be drawn up within the plan (a strategic Flood Risk Management objective could be considered, if appropriate) to correctly implement and abide by the 'Planning System and Flood Risk Management Guidelines (2009) for Local Authorities and associated Appendices.

Flood Risk Management (FRM)

The Planning System and Flood Risk Management Guidelines for Local Authorities (2009), associated Circulars and Technical Appendices must be used to ensure that the key principles of flood risk management are adopted and that the sequential approach to managing flood risk is considered at the earliest stage in the planning process. Where uncertainty exists the precautionary approach should be taken or further more detailed assessment carried out before decisions are made. A three Stage Flood Risk Assessment process is to be followed by the Planning Authority to identify whether flood risk exists and the degree to which it is an issue and assessment to a scale proportionate to the risk then carried out. The following is an overview of this three-stage process;

Stage 1 Flood risk identification – this is to identify whether there may be any flooding or surface water management issues related to a plan area or proposed development site that may warrant further investigation.

Stage 2 Initial flood risk assessment – to confirm sources of flooding that may affect a plan area or proposed development site, to appraise the adequacy of existing information



and to scope the extent of the risk of flooding which may involve preparing indicative flood zone maps. Where hydraulic models exist the potential impact of a development on flooding elsewhere and of the scope of possible mitigation measures can be assessed. In addition, the requirements of the detailed assessment should be scoped; and

Stage 3 Detailed flood risk assessment – to assess flood risk issues in sufficient detail and to provide a quantitative appraisal of potential flood risks to a proposed or existing development or land to be zoned, of its potential impact on flood risk elsewhere and of the effectiveness of any proposed mitigation measures.

In the preparation of the Draft Plan, OPW recommend that particular attention be paid to;

- Section 3.1 Planning Principles in the Planning Guidelines,
- Section 3.2 Sequential Approach in the Planning Guidelines,
- Chapters 3 and 4 relating to the Plan-making Justification Test and the Development Management Justification Test where it is intended to zone or otherwise designate land which is at moderate or high risk of flooding. Any justification tests required should be clear and concise and be accompanied by a map or figure demonstrating the site and details of the proposed changes. Analysis to an appropriate level of detail (SFRA or otherwise) should be used as a basis for the justification outputs.
- Any figures or maps, particularly those relating to zoning in areas of flood risk should;
 - be clear and concise in nature and should include flood extents identifying Flood Zones A, B and C as appropriate,
 - Identify the previous zoning designation and proposed zoning designation.

Other useful resources:

- Climate Change should be another key consideration in the Plan and the precautionary approach used in relation to FRM as set out in the guidelines. OPW have recently published the Draft Climate Change Adaptation Plan for Flood Risk Management which is available on our website.
- Flood Risk Management Plans and Interactive mapping to view flood hazard and flood risk information, www.floodinfo.ie.

If further information is required please do not hesitate to contact OPW in advance of the completion of the Draft Laois County Development Plan 2021 - 2027.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Karen Donovan', is written over a horizontal line.

Karen Donovan

Engineering Services Administration

28th February 2020