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11/08/2020

RE: Issues Paper Galway County Development Plan 2022 – 2028

Dear Sir/Madam,

The OPW, as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Issues Paper in the preparation of the Galway County Development Plan for the period 2022 – 2028.

Flood Risk Management (FRM) – General Guidance

Reference should be made to the Guidelines on the Planning System and Flood Risk Management (DHPLG/OPW, Nov 2009) as issued under Section 28 of the Planning Acts, here after referred to as the 'Guidelines', and associated Circulars and Technical Appendices, to ensure that the key principles of flood risk management and sustainable planning are adopted. The sequential approach to managing flood risk within the planning system should be considered at the earliest stage, and where uncertainty exists the precautionary approach should be taken or further more detailed assessment carried out before decisions are made. The Guidelines set out a three Stage Flood Risk Assessment process for the Planning Authorities to identify whether flood risk may exist and the degree to which it is an issue and then what assessment to a scale proportionate to the risk should then be carried out. The following is an overview of this three-stage process;

Stage 1 Flood risk identification – 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.

Stage 3 Detailed flood risk assessment – To assess flood risk issues in sufficient detail to prepare Flood Zone maps based on a quantitative appraisal of potential flood risks to a



proposed or existing development or land to be zoned, and to identify potential impacts 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 the following sections of the Guidelines;

- Chapter 3 – The Planning Principles,
- Chapter 3 – The Sequential Approach, and definitions of Appropriate Development,
- Chapters 3 and 4 – The Plan-making Justification Test where it is intended to zone or otherwise designate land where there is a moderate or high probability of flooding, noting that the application of the Test should be supported by analysis to an appropriate level of detail.

OPW advise clear commitments and strategic objectives regarding flood risk be included in the Draft Plan and an undertaking given to correctly implement and abide by the 'Planning System and Flood Risk Management Guidelines (2009).

Specific Flood Risk Management Issues for Consideration

The Flood Risk Management Plans and Flood Maps

The OPW, in conjunction with Galway County and other County Councils, undertook the National Catchment-based Flood Risk Assessment and Management (CFRAM) Programme, through which Flood Risk Management Plans (FRMPs) and flood maps were prepared. The CFRAM Programme included analysis of flood risk in:

- **River Basin 25/26:** Ahascragh, Ballinasloe and Portumna
- **River Basin 29:** Athenry, Gort, Kinvara, Loughrea and Oranmore
- **River Basin 30:** Claregalway, Corrofin, Oughterard and Tuam
- **River Basin 31:** Roundstone
- **River Basin 32:** Clifden

In this context:

- the OPW would request that Galway County Council have full regard to the proposed development of flood relief schemes in Ballinasloe, Clifden, Gort Lowlands, Portumna and the ongoing design, planning and implementation of the Clare River (Claregalway) and Dunkellin & Aggard Stream flood relief schemes to ensure that zoning or development proposals do not impede or prevent the progression of these measures.
- The flood maps, including those for potential future scenarios taking account of the possible impacts of climate change, are available to view on the OPW portal, www.floodinfo.ie, and may be obtained in GIS format from the OPW Data Management Section via email (flood_data@opw.ie).

Consideration of Climate Change Impacts

The potential impacts of climate change include increased rainfall intensities, increased fluvial flood flows and rising sea levels. 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 potential prone to flooding in the future, providing space for future flood defences, specifying minimum floor levels, setting specific development management objectives. It should be noted that the flood maps prepared under the CFRAM Programme (see above) include maps for two potential future scenarios taking account of different degrees of climate impact.

Coastal Change

While not specifically covered by the Guidelines, planning authorities should have regard to areas that may be prone to the risk of coastal change or erosion, including potentially increased risks due to climate change.

Impacts on Other Areas

While a particular development may not be prone to flood risk itself, it can increase flooding up- or down-stream, due to increased runoff from additional drainage or increased paved areas or to loss of storage. In line with the Guidelines, proposed new development needs to avoid increasing such flood risk elsewhere.

Natural Water Retention Measures

The OPW advises that the preparation of development plans should take account of the opportunities for natural water retention measures to reduce runoff and provide other benefits such as to water quality, biodiversity, etc. This can include in areas around existing developments, as well as within existing and proposed development in the form of Sustainable Urban Drainage Systems (SUDS).

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 Galway County Development Plan 2022 – 2028.

Yours Sincerely,

Engineering Services Administration