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8th February, 2019

RSES Submissions
The Northern and Western Regional Assembly
The Square
Ballaghaderreen
Co. Roscommon
F45 W674

Re.: Draft Regional Spatial and Economic Strategy for the Northern and Western Region

Dear Sir / Madam,

I refer to the Draft Regional Spatial and Economic Strategy for the Northern and Western Region published for consultation in November 2018 and set out below our observations with regards to flooding and flood risk management.

The OPW welcomes the publication of the draft Strategy that has been supported by a Regional Flood Risk Assessment (RFRA). The following aspects of the Strategy and RFRA are in particular considered to be both constructive and necessary to help ensure safe and sustainable communities in the future:

- The recognition in the Strategy and the RFRA that climate change may increase flood risk in the future and that future planning and development decisions arising on foot of the RSES should take such future risk into account,
- The support expressed within the Strategy for the proposed flood relief measures set out in the FRMPs (e.g., RPOs 22 and 197),
- The requirements set out in relation to the application of SUDS to reduce urban storm-water flooding (e.g., RPOs 21 and 206),
- The requirements to undertake SFRA's and apply the 2009 Guidelines on the Planning System and Flood Risk Management in future planning and development management decisions (e.g., in Section 2.4 of the Strategy and Section 4.2 of the RFRA).

As stated, the above points are central to sustainable development, and will assist with the sustainable management of flood risk in Ireland for future generations.

The need for the consolidation of growth within existing urban areas, as expressed in a range of RPOs (e.g. 1, 9, 11-15 and 186) is recognised. However, it is noted that the further concentration of development, which may include regeneration and infill, within areas prone to flooding or that may become prone to flooding, could, if not carefully managed, lead to a substantial increase in flood risk arising from the combination of increasing hazard of flooding due to the potential impacts of climate change and increasing potential damages within the flood prone areas. The OPW would suggest that this risk might be clearly noted, along with the need for such risks to be minimised through the county and local area planning processes.

It is also suggested that an increased emphasis might be given in the Strategy to the consideration of climate change adaptation, and that the potential impacts of climate change on increasing flooding and flood risks should inform lower level planning decisions, including the location and design of infrastructure.

The OPW considers that RPO 21 is critical in ensuring sustainable development, but would suggest that this Policy Objective might be further developed as follows:

- The preparation of development plans should manage, as well as assess, flood risk through the implementation of the referenced 2009 Guidelines,
- The Objective might specifically reference the need for the consideration of potential future increases in flooding as part of the planning process in the application of the 2009 Guidelines,
- The planning, development and consent for transport, utility and social infrastructure, as well as broader urban planning, should take into account flood risk, in line with the principles of the 2009 Guidelines,
- Consideration might be given to splitting the Objective, whereby the promotion of SUDS might be afforded an Objective in its own right.

The OPW welcomes the support of the proposed flood relief measures set out in the Flood Risk Management Plans, developed through the National CFRAM Programme. In this regard, it is suggested that further emphasis might be placed on the consideration of the proposed measures for reducing and managing flood risk, and on any future measures that may emerge from reviews of the Programme, in the preparation of lower level plans and development management decision-making.

The draft Strategy does not appear to make reference to the flood risks to existing and potential future development arising from coastal erosion. This is a threat to property, infrastructure and land around the country, and is a risk that is expected to increase with rising sea levels. It is suggested that this consideration be addressed in the Strategy, with a Policy Objective included for this risk to be considered in all planning and development management decision-making.

It is noted that Circular PL2/2014 is referred to in RPO 21 and within the RFRA. It is suggested that any further Circular that may issue prior to finalisation of the Strategy with regards to the consideration of flooding in planning and development management, and the use of the final CFRAM maps in these processes, might be referenced, as appropriate, within the final Strategy.

Finally, it would be appreciated if the text in Section 8.5 (page 284) of the Strategy could reflect that the details of the measures proposed in the Flood Risk Management Plans are available from the OPW website at www.floodinfo.ie, rather than www.flooding.ie.

The OPW would be happy to provide any further information as necessary and/or to respond to any queries you may have in relation to the above submission.

Yours sincerely,



Mark Adamson
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Flood Relief and Risk Management Division