



**Forward Planning,
Mayo County Council,
Aras an Chontae,
The Mall,
Castlebar,
Co. Mayo,
F23 WF90**

22nd April 2022

RE: Material Alterations to the Draft Mayo County Development Plan 2021-2027

Dear Sir/Madam,

The Office of Public Works (OPW), as lead agency for flood risk management in Ireland, welcomes the opportunity to comment on the Draft Mayo County Development Plan 2021-2027.

This submission is made specifically concerning 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 concerning the estate portfolio, heritage and other areas of responsibility.

The OPW welcomes the updated SFRA addressing commentary on the draft plan.

In particular, the OPW welcomes the following:

- The addition of Plan Making Justification Tests to assess the appropriateness of land use zonings in flood risk areas
- The additional objective INO26 to ensure developments on opportunity sites in all towns and villages are subject to Flood Risk Assessments if required
- The commentary in the SFRA regarding the requirement for consent from the OPW Commissioners under Section 50 of the Arterial Drainage Act 1945 for the construction, replacement or alteration of bridges and culverts

Flood Zone Mapping

The OPW commentary on the draft plan advised that while Flood Zones were indicated on the images for each specific settlement in the SFRA, the images were small with a large amount of detail and that it was difficult to assess the flood risk from the Maps for each settlement. It was recommended that separate Flood Zone maps clearly illustrating the mapped flood zones with the land use zonings be produced. It is noted that this has not been addressed, and no additional Flood Zone mapping overlaid on land use zone mapping has been included at Material Alteration stage.

Justification Test

As mentioned above, the OPW welcomes the inclusion of Plan Making Justification Tests to assess the appropriateness of vulnerable land use zonings in flood risk areas.

It is noted that in several cases not all of the conditions of the Justification Test have been satisfied. If all conditions of the Plan Making Justification Test have not been satisfied, the Justification Test has not been passed, and the zoning is not justified. Examples of this are detailed in the 'Comments on Specific Settlements' section below.

As the *Agriculture* zoning is generally water compatible but can allow for some high and less vulnerable usage, when lands zoned as such have failed a Justification Test it may be appropriate to retain the zoning with a policy objective attached to restrict development to usage appropriate to the relevant Flood Zone.

It would be beneficial if mitigation measures which have formed the basis upon which land use zonings have been justified were incorporated into the plan supported by relevant policy objectives.

Preliminary Flood Risk Assessment (PFRA) and National Indicative Fluvial Mapping (NIFM)

The addition of the National Indicative Fluvial Mapping (NIFM) dataset is noted and welcomed. While these maps are an improvement on PFRA mapping, they are still indicative maps and the same cautions and limitations as outlined in Circular PL 2/2014 for PFRA should be followed.

The OPW commentary on the draft plan also noted that while it was stated in Table 4.1 of the SFRA regarding PFRA mapping that "*For purposes of SFRA and at Development Management level these cannot be used without validation through site visits*", for number of settlements the SFRA has stated that the flood map information came solely from PFRA, without any commentary stating that this was validated through a site visit. A list of examples was provided. It is noted that the discussion on settlements in question still states that information comes solely from either PFRA, NIFM, or PFRA/NIFM.

Comments on Specific Settlements

Ballinrobe

The Justification Test in section A1.3 of the SFRA for the highly vulnerable *Strategic Residential Reserve* zoned lands has stated that in section 2 of the Justification Test parts (i), (ii), (iv) and (v) are not applicable. All parts of the Justification Test must be satisfied for a highly vulnerable zoning such as *Strategic Residential Reserve* to be considered justified in Flood Zones A and B.

Claremorris

The Justification Test in section A4.4 of the SFRA for the highly vulnerable *Strategic Residential Reserve* zoned lands has stated that in section 2 of the Justification Test parts (i), (ii), (iv) and (v) are not applicable, and that part (iii) has not been satisfied. All parts

of the Justification Test must be satisfied for a highly vulnerable zoning such as *Strategic Residential Reserve* to be considered justified in Flood Zones A and B.


Swinford

The Justification Test in section A5.3 of the SFRA for the highly vulnerable *New Residential* zoned lands has stated that in section 2 of the Justification Test parts (i), (ii), (iv) and (v) are not applicable, and in response to part (iii) has stated “*no, in relative proximity to the core area*”. All parts of the Justification Test must be satisfied for a highly vulnerable zoning such as *New Residential* to be considered justified in Flood Zones A and B.

The Justification Test in section A5.4 of the SFRA for the *Strategic Residential Reserve* zoned lands has stated that in section 2 of the Justification Test parts (i), (ii), (iv) and (v) are not applicable, and that part (iii) has not been satisfied. All parts of the Justification Test must be satisfied for a highly vulnerable zoning such as *Strategic Residential Reserve* to be considered justified in Flood Zones A and B.

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 Mayo County Development Plan 2021-2027.

Yours sincerely,



PP Conor Galvin
Flood Relief and Risk Management Division