

# STRATEGIC FLOOD RISK ASSESSMENT ADDENDUM

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**UPDATES ON FOOT OF SUBMISSIONS MADE ON  
AND PROPOSED MATERIAL ALTERATIONS TO**

**THE**

**DRAFT  
ROSCREA LOCAL AREA PLAN  
2023-2029**

**AND ASSOCIATED DOCUMENTS**

**for: Tipperary County Council**

Civic Offices  
Emmet Street  
Clonmel  
County Tipperary



**Comhairle Contae Thiobraid Árann**  
Tipperary County Council

**by: CAAS Ltd.**

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**JUNE 2023**

## Proposed Material Alterations

All Proposed Material Alterations, including those related to land use zoning are considered to comply with the requirements of the Flood Risk Management Guidelines.

## Updates to Plan and SFRA report

The table below identifies flood risk management related updates to be made to the Draft Roscrea Local Area Plan 2023-2029 and Strategic Flood Risk Assessment (SFRA) report that were previously placed on public display.

No.	Updates
1	<p><del>'Crossed out'</del> = Text to be Deleted            'Normal text' = <b>Text to remain as is</b>            'Text in red' = <b>Text to be added to the Draft Plan</b></p> <p><b>Amend Plan Section 8.5</b></p> <p><del>"A Strategic Flood Risk Assessment (SFRA), as required by 'The Planning System and Flood Risk Management Guidelines for Planning Authorities' (Department of the Environment, Heritage and Local Government and Office of Public Works, 2009) and Circular PL 2/2014 (Department of Environment, Community and Local Government), has been undertaken alongside the preparation of the SEA and the preparation of the Draft LAP. Both the risk from fluvial sources informed the and pluvial flooding were considerations as part of the review of land use zoning provided for by the Plan.</del></p> <p>The SFRA focused on land use zoning as well as flood risk management policy and has considered available, and emerging information on flood risk indicators, including the OPW's Flood Hazard and Risk Mapping and any flood defences. <b>In line with the Guidelines, this demonstrates that Tipperary County Council have considered such climate change impacts in the preparation of this Plan, by avoiding development in areas potentially prone to flooding in the future. Overlays Land Use Zoning and National CFRAM potential future scenario mapping have been included in the SFRA. Various flood risk management provisions from the County Development Plan and the Local Area Plan explicitly integrate climate change considerations. This includes Policy 8.4 d) outlined below.</b> In line, with the requirements of the Flood Risk Guidelines, Flood Zones A and B have been identified for Roscrea and are outlined below: (also mapped on Map 1).</p> <p>Areas that are located in flood risk areas are generally not zoned for uses that are vulnerable to flooding. In cases where a site is zoned for use in an area at flood risk, a 'Justification Test' was carried out as part of the SFRA (Appendix 7).</p> <p>In addition to the Flood Zones A and B as identified, there are areas in Roscrea, due to its underlying geology, that may be subject to intermittent ground water and pluvial flooding. Therefore, the Council will require that groundwater and pluvial risks are considered by any site-specific flood risk assessment undertaken at project level, in compliance with the Planning System and Flood Risk Assessment Guidelines (DEHLG, 2009)."</p>
2	<p><b>Amend Plan Policy 8-4</b></p> <p>Permit and encourage the use of renewable energy technologies <b>at appropriate scales in</b> residential, commercial and community developments <b>and support the principle of on-site energy generation for self-consumption.</b></p> <p><del>Require proposals for development to comply with requirements of the Planning System and Flood Risk Assessment Guidelines (DEHLG, 2009) and any update thereof) including providing detailed design specifications as may be required to facilitate the impact of development. The following provisions apply:</del></p> <p><del>a) Extensions of existing uses or minor development within flood risk areas will be supported, provided they do not: obstruct important flow paths; introduce a number of people into flood risk areas; entail the storage of hazardous substances; have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities; or increase the risk of flooding elsewhere.</del></p>

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3	<p><b>Insert Plan Policy 8.5</b></p> <p>Require proposals for development to comply with requirements of the Planning System and Flood Risk Assessment Guidelines (DEHLG, 2009) and any update thereof) including providing detailed design specifications as may be required to facilitate the impact of development. The following provisions apply:</p> <p>a) Extensions of existing uses or minor development within flood risk areas will be supported, provided they do not: obstruct important flow paths; introduce a number of people into flood risk areas; entail the storage of hazardous substances; have adverse impacts or impede access to a watercourse, floodplain or flood protection and management facilities; or increase the risk of flooding elsewhere.</p> <p>b) Applications for development on previously developed lands within Flood Zones A or B, shall be subject to site specific flood risk assessment and shall provide details of structural and non-structural flood risk management measures, such as those relating to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events.</p> <p>c) Where a 'Justification Test' applies, it must be demonstrated to the satisfaction of the planning authority that the flood risk can be adequately managed, and that the use and the development of the lands will not cause unacceptable impacts elsewhere.</p> <p>d) Require the submission of site-specific Flood Risk Assessments for developments undertaken within Flood Zones A &amp; B and on lands subject to the mid-range future scenario floods extents, as published by the Office of Public Works. These Flood Risk Assessments shall consider climate change impacts and adaptation measures including details of structural and non-structural flood risk management measures, such as those relating to floor levels, internal layout, flood-resistant construction, flood-resilient construction, emergency response planning and access and egress during flood events. <b>Flood Risk Assessments shall apply the precautionary approach recommended in the Guidelines and shall be informed by the advice on the expected impacts of climate change and the allowances to be provided for future flood risk management provided in the OPW's (2019) Flood Risk Management Climate Change Sectoral Adaptation Plan and the guidance on potential future scenarios contained therein."</b></p> <p>e) Groundwater and pluvial flood risks shall be considered by any site-specific flood risk assessment undertaken at project level, in compliance with the Planning Systems and Flood Risk Management Guidelines (DEHLG, 2009). <b>For the avoidance of doubt, the Office of Public Works' Preliminary Flood Risk Assessment indicative pluvial maps (2012) are not considered to be reliable for assessing pluvial risk."</b></p>
4	<p><b>Insert in Plan at end of Table 9.2</b></p>





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5	<p><b>Amend SFRA Report Section 2.4, Table 3, Row 4, Column 2</b></p> <p>This assessment has considered all types of flooding, including that which can occur from rivers, the sea and estuaries, heavy rain, groundwater, the failure of infrastructure, and so on. It has also considered the impacts flooding can have on people, property, businesses, the environment and cultural assets. Further information on the purpose and development of the OPW PFRA Maps are available on <del>www.cfram.ie</del> <a href="http://www.floodinfo.ie">www.floodinfo.ie</a></p>
6	<p><b>Amend SFRA Report Section 3.4</b></p> <p><del>Advice on the expected impacts of climate change and the allowances to be provided for future flood risk management in Ireland is given in the OPW Draft Guidance on Assessment of Potential Future Scenarios for Flood Risk Management (2009):</del></p> <p>"Flood Risk Assessments shall apply the precautionary approach recommended in the Guidelines and shall be informed by the advice on the expected impacts of climate change and the allowances to be provided for future flood risk management provided in the OPW's (2019) Flood Risk Management Climate Change Sectoral Adaptation Plan <b>and the guidance on potential future scenarios contained therein.</b>"</p>
7	<p><b>Amend SFRA Report Section 3.5</b></p> <p><b>Amend paragraph 2 as follows:</b></p> <p>It is likely that some or all of the following SuDS techniques will be applicable to key development sites, <b>such as the regeneration sites</b>, within Roscrea, including to manage surface water run-off:</p> <ul style="list-style-type: none"> <li>• Rainwater harvesting</li> <li>• Green roofs</li> <li>• Infiltration systems</li> <li>• Proprietary treatment systems</li> <li>• Filter strips</li> <li>• Filter drains</li> <li>• Swales</li> </ul>

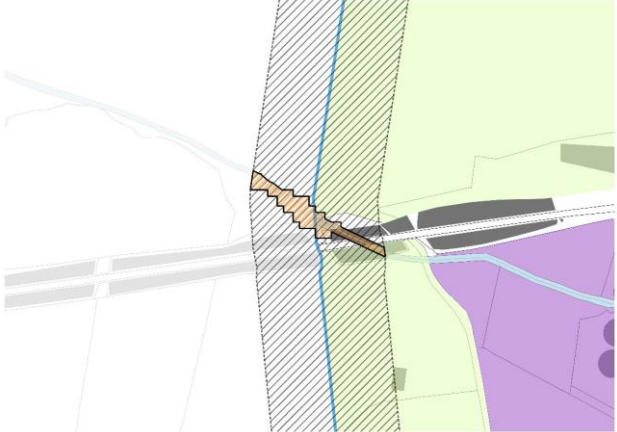
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8	<p><b>Amend SFRA Table 7</b></p> <table border="1" data-bbox="206 938 2011 1303"> <thead> <tr> <th data-bbox="206 938 571 1109">Site and Zoning in Draft Plan</th> <th colspan="3" data-bbox="571 938 1915 965">Justification Test (Fails, if one of the following fails; all must be passed for the test to be passed)</th> <th data-bbox="1915 938 2011 1109">Overall Result</th> </tr> <tr> <td data-bbox="206 1109 571 1303"></td> <td data-bbox="571 965 772 1109">Is the settlement targeted for growth under the NPF, RSES, existing CDP and/or Draft CDP?</td> <td data-bbox="772 965 1030 1109">Is the zoning of the lands required to achieve the proper planning and sustainable development of the settlement <b>and in particular has the required sub-criteria been satisfied<sup>2</sup>.</b></td> <td data-bbox="1030 965 1915 1109"><b>SFRA recommendation integrated into the Plan for management of risk?</b> Has flood risk assessment to an appropriate level of detail been carried out as part of the SEA as part of the plan preparation process, which demonstrates that flood risk to the development can be adequately managed and the use or development of the lands will not cause unacceptable adverse impact elsewhere</td> <td data-bbox="1915 1109 2011 1303"></td> </tr> </thead> <tbody> <tr> <td data-bbox="206 1109 571 1303">                     1. 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<sup>1</sup> Refer to Plan "Table 9.2: Zoning Matrix", for example, for the wide range of land uses possible at sites zoned with single land use zoning objectives.

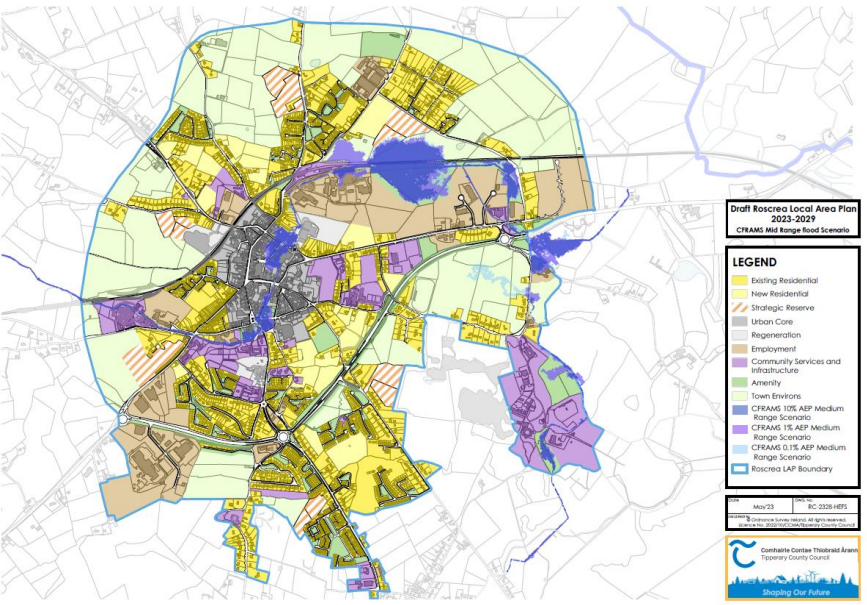
<sup>2</sup> (i) Is essential to facilitate regeneration and/or expansion of the centre of the urban settlement; (ii) Comprises significant previously developed and/or under-utilised lands; (iii) Is within or adjoining the core of an established or designated urban settlement; (iv) Will be essential in achieving compact and sustainable urban growth; and (v) There are no suitable alternative lands for the particular use or development type, in areas at lower risk of flooding within or adjoining the core of the urban settlement.

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<p>meanings are explained in the Plan, including through the provisions repeated in this SFRA report.</p> <p>2. Former Pharmaceutical Complex Regeneration site of strategic importance to the further growth of the town centre and part of it floods.</p> <p>Note that the meaning of zoning objectives has been influenced by the SFRA process and these meanings are explained in the Plan, including through the provisions repeated in this SFRA report.</p>	<p>Yes – Roscrea is designated as a 'District Town'. As set out in the Core Strategy of the Tipperary CDP 2022</p>	<p>Planning Department.</p> <p>This land use zoning proposal fulfils all <b>required</b> sub-criteria and would contribute towards overall sustainable, compact and balanced regional development by inclusion as part of the <del>LAP Development Plan</del> - as confirmed by the Planning Department.</p>	<p>indicate lands constrained by flood risk. The Lap is subject to the policies, objectives and requirements of the TCDP that relate to flood risk and climate change and the LAP contains a number of specific policies and objectives in this regard.</p> <p>Yes, see provisions repeated in Section 4 of this report</p> <p>A Stage 1 and 2 Flood Risk Assessment has been undertaken as part of the plan preparation process. This level of assessment is considered appropriate and has informed the zoning proposals and policies and objectives contained in the LAP.</p> <p>Section 4.1 – 4.4 of the SFRA outlines the measures integrated into LAP to adequately manage flood risks. A precautionary approach has been applied to the zoning of lands with undeveloped lands that is liable to flood generally zoned for amenity or town environs use, flood risk maps have been overlain on the land use zoning map to clearly indicate lands constrained by flood risk. The Lap is subject to the policies, objectives and requirements of the TCDP that relate to flood risk and climate change and the LAP contains a number of specific policies and objectives in this regard.</p>	<b>Pass</b>	
<p>3. Centre of the town Urban Core</p> <p>Note that the meaning of zoning objectives has been influenced by the SFRA process and these meanings are explained in the Plan, including through the provisions repeated in this SFRA report.</p>	<p>Yes – Roscrea is designated as a 'District Town'. As set out in the Core Strategy of the Tipperary CDP 2022</p>	<p>This land use zoning proposal fulfils all <b>required</b> sub-criteria and would contribute towards overall sustainable, compact and balanced regional development by inclusion as part of the <del>LAP Development Plan</del> - as confirmed by the Planning Department.</p>	<p>Yes, see provisions repeated in Section 4 of this report</p> <p>A Stage 1 and 2 Flood Risk Assessment has been undertaken as part of the plan preparation process. This level of assessment is considered appropriate and has informed the zoning proposals and policies and objectives contained in the LAP.</p> <p>Section 4.1 – 4.4 of the SFRA outlines the measures integrated into LAP to adequately manage flood risks. A precautionary approach has been applied to the zoning of lands with undeveloped lands that is liable to flood generally zoned for amenity or town environs use, flood risk maps have been overlain on the land use zoning map to clearly indicate lands constrained by flood risk. The Lap is subject to the policies, objectives and requirements of the TCDP that relate to flood risk and climate change and the LAP contains a number of specific policies and objectives in this regard.</p>	<b>Pass</b>	
<p>4. Lands Zoned Town Environs to the west of the town following a linear route north-south from the N62 to the R445</p> <p>Note that the meaning of zoning objectives has been influenced by the SFRA process and these meanings are explained in the Plan, including through the provisions repeated in this SFRA report.</p>	<p>Yes – Roscrea is designated as a 'District Town'. As set out in the Core Strategy of the Tipperary CDP 2022</p>	<p>The land zoning is appropriate in this location to safeguard urban sprawl. The provision of urban-relief road would reduce town centre traffic and is a necessary piece of strategic infrastructure. As a relief road, it is not possible to locate it adjacent to or within the urban core and therefore fulfils all required sub-criteria and would contribute towards overall sustainable, compact and balanced regional development by its inclusion.</p>	<p>A Stage 1 and 2 Flood Risk Assessment has been undertaken as part of the plan preparation process. This level of assessment is considered appropriate and has informed the zoning proposals and policies and objectives contained in the LAP.</p> <p>Section 4.1 – 4.4 of the SFRA outlines the measures integrated into LAP to adequately manage flood risks. A precautionary approach has been applied to the zoning of lands with undeveloped lands that is liable to flood generally zoned for amenity or town environs use, flood risk maps have been overlain on the land use zoning map to clearly indicate lands constrained by flood risk. The LAP is subject to the policies, objectives and requirements of the TCDP that relate to flood risk and climate change and the LAP contains a number of specific policies and objectives in this regard.</p>	<b>Pass</b>	

No.	Updates	
9	<p><b>Insert Maps of lands subject to Justification Test into SFRA</b></p> <p>1. Existing in-use meat processing facility &amp; adjacent supplies and repair facility.</p>  <p>2. Former Pharmaceutical Complex</p>  <p>3. Centre of the town</p>  <p>4. Relief Road</p> 	

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No.	Updates	
10	<p><b>New Map(s) to be inserted at end of SFRA</b></p> <p>Land Use Zoning and Flood Risk Future Scenarios (Medium)</p> 	<p>Land Use Zoning and Flood Risk Future Scenarios (High)</p> 